MID SUSSEX DISTRICT COUNCIL

Gatwick Airport Northern Runway
National Infrastructure Project
TR020005

Relevant Representation Submission

27th October 2023

1.0 Summary

1.1 Mid Sussex District Council is an adjoining authority to the Gatwick Airport Northern Runway Project (NRP). The Council works collaboratively with the nine local authorities surrounding the airport, including the host authorities (Crawley Borough Council, Reigate and Banstead Borough Council, Mole Valley District Council, Tandridge District Council, Surrey County Council and West Sussex County Council) and the neighbouring authorities (Horsham District Council, East Sussex County Council and Kent County Council). Together, the ten local authorities are referred to in this Representation as the Joint Local Authorities (JLAs).

1.2 Mid Sussex District Council has undertaken an initial review of the application documents and has identified what it considers to be the main issues arising from the project and the application documents submitted by the applicant.

1.3 Mid Sussex District Council has a number of wide-ranging concerns with the application submitted by Gatwick Airport Limited (GAL) to bring the existing standby (northern) runway into routine use for departures (the Northern Runway Project, abbreviated below to NRP). This relevant representation sets out the key headlines of our concerns. Further information and detail about these concerns will be set out in the Local Impact Report.

1.4 In summary, MSDC's key concerns are set out below:

a) The Council is not satisfied that a robust assessment of **Aviation need, capacity and forecasting** has been provided.

b) The Council has wide-ranging concerns about the methodology used to assess the **Noise and Vibration** impacts arising from the NRP and the measures proposed to monitor and mitigate those impacts.

c) The Council has wide-ranging concerns about the methodology used to assess the impacts of the NRP on **Air Quality** and the measures proposed to monitor and mitigate those impacts.

d) The Council has identified a number of issues that should be addressed to provide a more robust assessment of **Climate Change** impacts and has concerns regarding how appropriate mitigation will be delivered, funded and secured.

e) The Council has wide-ranging concerns about the methodology used to assess the **Greenhouse Gases** (GHG) arising from the NRP and the measures proposed to monitor and mitigate those GHG.

f) The Council has wide-ranging concerns about the methodology used to assess the **Traffic and Transport impacts** of the NRP and the measures proposed to monitor and mitigate those impacts.

g) The Council has wide-ranging concerns about the methodology used to assess the **Socio–Economic** impacts arising from the NRP and the measures proposed to monitor and mitigate those impacts.

h) The Council is not satisfied that a robust assessment of the impact of the project on the **Historic Environment and Landscapes** within Mid Sussex (which include the High Weald Area of Outstanding Natural Beauty) has been undertaken.

i) The Council has concerns with the drafting of several passages of the **Draft Development Consent Order**.

j) The Council has a number of queries regarding the **Planning Statement** accompanying the application.

2.0 Introduction

2.1 Mid Sussex District Council is an adjoining authority to the Gatwick Airport Northern Runway National Infrastructure Project (NSIP). The District lies about 2km south-east from the edge of the project, separated from the administrative boundary of Crawley, where Gatwick Airport is located, by the M23.

2.2 Mid Sussex District Council works collaboratively with the host authorities and the neighbouring authorities.

2.3 The expansion of Gatwick Airport proposed in this NSIP will be likely to have clear and focused on the specific impacts on Mid Sussex District. Mid Sussex District Council, along with Horsham District Council. Has the closest functional relationship in planning terms with Crawley (the Borough in which the majority of the NSIP development would be delivered). Together, Mid Sussex, Horsham and Crawley comprise the North West Sussex Housing Market area and the Functional Economic Market Area. As a result the three authorities have strong social and economic links. The North West Sussex authorities have a long history of joint working, including Local Plan work, and our evidence base demonstrates the socio-economic links, as set out in the Strategic Housing Market Assessment (2021) and Mid Susse Economic Growth Assessment (March 2022). The Applicant's evidence base corroborates this position as it shows that it will rely on the labour supply in Mid Sussex to fill new jobs at the expanded airport and that, in turn, new jobs will be created in Mid Sussex due to the proximity of the airport.

2.4 In addition, Mid Sussex has direct road and rail links to the airport. The expansion of the airport is likely to put additional pressure on transport infrastructure in the District.

2.5 The ten JLAs have well-established joint working arrangements in responding to and engaging on this project. This joint working happens at Chief Executive and Council Leader level down to the technical officer level. Where practicable the JLAs have secured joint technical specialists and consultants to support the work of the local authority officers.

2.6 Mid Sussex District Council has undertaken an initial review of the application documents and has identified what it considers to be the main issues arising from the project and the application documents.

2.7 The issues set out below are the main issues identified during the relevant representation period, taking into account pre-application engagement undertaken by the applicant. The Examining Authority will be aware of the concerns expressed by Mid Sussex and others regarding the adequacy of consultation undertaken by the applicant prior to submission. More detailed feedback will be provided on this matter through Written Representations and Local Impact Reports in due course.

3.0 Aviation need, capacity and forecasting

3.1 The wider economic benefits of the NRP have been overstated. This is relevant when assessing the balance between such benefits and any environmental impacts.

3.2 The increased capacity attainable from the NRP has been overstated by GAL and as a consequence, levels of usage – the demand forecasts – have been overstated.

3.3 The methodology by which these forecasts have been derived is not robust, even if the underpinning assumptions relating to the capacity attainable with two runways is correct.

3.4 The consequence of this overstatement of demand is that the ceiling Limit for the noise contour area in the Noise Envelope will have been set too large, thereby providing no effective control on, or incentive to, reduce noise levels at the Airport.

3.5 The wider economic benefits of the proposed development 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 on the local area have been assessed is not robust and little reliance can be placed on this assessment.

4.0 Noise and Vibration

4.1 The Council has concerns about the methodology used to assess the Noise and Vibration impacts arising from the NRP and the measures proposed to monitor and mitigate those impacts. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) are set out below.

4.1.1 **Local Planning Policy** - Local planning policies relevant to noise and vibration are listed in ES Chapter 14, Table 14.2.2, of the ES but no information is provided on how these policies are addressed in the ES. Mid Sussex planning policy relating to noise has been incorrectly reported in this table.

4.1.2 **Baseline** - Baseline data that feeds into the aircraft noise assessment should be provided. This includes Sound Exposure Level (SEL) and LAmax data (A-weighted maximum sound level of a noise event) measured by Gatwick's Noise and Track Keeping system that was used to validate the air noise model.

4.1.3 **Assessment Methodology** - Assessment criteria based around the Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) focus on noise effects at residential receptors. Non-residential receptors should be considered on a case-by-case basis with assessment criteria defined depending on the non-residential use. For the ground noise and air noise assessments, changes in noise should be identified for receptors experiencing noise levels between LOAEL and SOAEL and for those experiencing noise levels exceeding SOAEL.

4.1.4 **Construction Noise** - No information is provided on how the LOAEL is defined at sensitive receptor locations in accordance with Table 14.4.4 in ES Chapter 14. It is unclear what construction activities are occurring within each assessment scenario.

4.1.5 **Construction Vibration** - The construction vibration assessment only considers effects from sheet piling and does not consider vibration effects from vibratory compactors and rollers used in highway construction.

4.1.6 **Aircraft Noise**

a. Details of the validation process, noise modelling process and any assumptions and limitations applied should be provided.
b. Aircraft fleets are not provided for the 92-day summer period. It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets. Aircraft fleets used in noise models should be provided along with an explanation of how the fleet is split between the two runways
c. No details of the noise modelling or validation process are provided. It is difficult to have any confidence in the noise model without details of the validation process, noise modelling process and the assumptions and limitations that have been applied.
d. It should be clarified what scenario has been considered when identifying receptors experiencing noise levels exceeding the SOAEL. It should be identified how many properties are exposed to noise levels exceeding the SOAEL for both the Central Case and the Slow Transition Case.

e. Receptors newly experiencing noise levels exceeding the SOAEL are not identified. It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine compliance with the Airports National Policy Statement (ANPS).
f. The assessment of air noise only covers 2032 as it is identified as the worst-case; however, identification of significant effects for all assessment years should be provided.
g. Context for the aircraft noise assessment is provided through consideration of the secondary metrics; however, no conclusions as to how secondary metrics relate to likely significant effects have been made. The use of secondary metrics within the overall assessment of likely significant effects is therefore unclear.

4.1.7 **Ground Noise**

a. It is not clear if 'engine ground running', 'auxiliary power unit' and 'engine around taxi noise' is included in LAeq,T ground noise predictions. Consequently, ground noise LAeq,T levels may be understated. All ground noise sources should be included in LAeq,T predictions covering a reasonable worst-case day.
b. The ground noise assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB LAmax predictions by identifying car pass-by LAmax levels of 80 dB. However, there is no attempt to contextualise LAmax engine ground running noise at any other receptor location. The assessment of engine ground noise should cover all assessment locations.
c. The Central Case has been considered for the ground noise assessment; however, higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience significant noise effects that are identified in the Central Case assessment. Ground noise emissions during the Slower Transition Case should be assessed.
d. It is not clear if fire training activities at the new fire training ground are considered within the ground noise assessment. Noise emissions from fire training ground activities should be assessed.
e. The assessment of ground noise only covers 2032 as it is identified as the worst-case; however, identification of likely significant effects for all assessment years should be provided.
f. Context to the ground noise assessment is provided through consideration of the secondary metrics; however, no conclusions as to how secondary metrics relate to likely significant effects have been made. The use of secondary metrics within the overall assessment of likely significant effects is therefore unclear.

4.1.8 **Surface Access Noise** - One 20-minute survey and one 10-minute survey is not sufficient to provide data suitable for validation of the road traffic noise model and indeed these data are not used as such. There is therefore no validation of the road traffic noise model in terms of measured levels. Long-term monitoring should be undertaken to provide confidence in the road traffic noise model. Consultation on the monitoring methodology should be undertaken with Local Authorities.

4.1.9 **Fixed Plant Noise** - No mechanism for securing fixed plant limits for any future assessment of fixed plant noise is provided. Fixed plant noise limits should apply to cumulative levels of fixed plant noise and not to "any" fixed plant.

4.1.10 **Noise Insulation Scheme**

a. Residents of properties within the inner zone will be notified within 6 months of commencement of works; however, the noise contours on which eligibility would be based upon are not clear.
b. Residents in the outer zone should be offered more flexibility on the type of insulation rather than being restricted to ventilation.
c. The noise insulation scheme should extend to community buildings (e.g. care homes, places of worship, village halls, hospitals etc.).

d. It is not clear if properties that have already received insulation would be eligible for upgraded noise insulation as part of the new scheme.
e. 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.

4.1.11 **Noise Envelope**

a. It should be demonstrated, as part of the Noise Envelope how the noise benefits of future aircraft technology are shared between the airport and local communities. Demonstrating how benefits are shared is a requirement set out in the Aviation Policy Framework (Department for Transport, 2013).
b. 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. This means that the Noise Envelope would allow for an increase in noise contour area on the opening day of the NRP.
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.
e. Local authorities should have a regulatory role in the Noise Envelope that involves reviewing and approving submissions. This role should allow action to be taken in the event of a breach.
f. Thresholds should be adopted within the Noise Envelope with the intention that action can be implemented prior to a contour limit breach occurring.
g. 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.

5.0 Air Quality

5.1 The Council has concerns about the methodology used to assess the impacts of the NRP on air quality and the measures proposed to monitor and mitigate those impacts. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) is set out below:

5.1.1 **Assessment Scenarios** - There are a number of clarifications required to understand the Assessment Scenarios utilised in the air quality assessment. This is particularly the case for those scenarios where both construction and operational activities are underway at the same time, but the assessment has treated them separately. The concern is that the scenarios assessed in the ES do not provide a realistic worst case assessment.

5.1.2 **Study Areas -** Further information on the road traffic study areas utilised by the applicant within the air quality assessment for both the construction and operational study areas is required from the applicant. This information is required to understand which routes have been affected by changes in traffic in the construction and operational phases. Without this information it is not possible to fully understand the air quality assessment of road traffic air quality effects.

5.1.3 **Uncertainty** - The future air quality predictions are in part, reliant, on modal shift assumptions. To understand how much air quality may deteriorate if measures are not successful, information is required on how sensitive predications are to modal shift objectives not being achieved.

5.1.4 **Operational Air Quality Monitoring** - Linked to the uncertainty around the effectiveness of modal shift measures, further information is requested to understand how air quality will be

monitored, evaluated and reported to local authorities, along with the further steps that would be taken should air quality deteriorate more than predicted.

5.1.5 **Provision of Further Information** - Further information, particularly in relation to figures, is required to be able to link air quality results to specific receptor locations and to understand how model verification has been applied to receptor locations in the study area.

5.1.6 **Model Verification** - An updated air quality model verification has been presented in the ES compared to the Preliminary Environmental Information Report (PEIR). This has improved the verification, but it is still necessary to establish if the air quality model verification is robust. In particular, further information is requested on the large numbers of air quality monitors excluded from the assessment and why a more up to date baseline year of 2022 was not used compared to the 2018 year utilised (using 2016 extrapolated traffic data).

5.1.7 **Air Quality Action Plan -** A combined operational air action plan has not been prepared to draw together these documents and to specifically focus on local air quality. It is also noted that the approach differs from previous discussions where a draft Air Quality Action Plan (AQAP) was provided in 2022. The proposed AQAP could be informed by local monetisation of air quality impacts. This is a matter of local concern, as shown in the local guidance prepared by Sussex and participating members in 2021.

5.1.8 **Additional Information -** A range of further information and clarifications that are required to fully understand the air quality assessment methodology and assessment outcomes presented in the ES.

5.1.9 **Technical Details -** Clarifications on a range of technical details are required, including on rates of future air quality improvement, pollutants assessed, construction plant (i.e. asphalt plant), heating plant and road traffic modelling. Further information is requested to help understand if a realistic worst case has been assessed.

5.1.10 **Construction Traffic Management Plan (CTMP) and Construction Workforce Travel Plan (CWTMP)** - Additional information on the monitoring of the effectiveness of the CTMP and CWTMP is requested. This is requested to understand how any deviation from the plan(s) will be addressed to protect air quality.

5.1.11 **Emissions Ceiling Calculations -** Linked to the concern about the assessment scenarios considered in the air quality assessment, the same concern applies to the emissions ceiling calculations, specifically how realistic these are, particularly when there are construction and operational activities ongoing and the emissions ceiling calculations treat these separately. Additionally, further clarification is needed on some counterintuitive changes predicted in the emissions ceiling calculations.

5.1.12 **Habitat Regulation Assessment (HRA) -** The HRA utilises the predicted air quality results for NOx, ammonia and nitrogen deposition to determine whether there are habitat integrity risks to European designated sites. The HRA concludes there are none in relation to air quality both for the proposed development in isolation and in combination. However, this is based on the scenarios assessed within the air quality chapter that need further review to determine if the scenarios represent a realistic worst case.

6.0 Climate Change

6.1 The Council has identified a number of issues that should be addressed to provide a more robust assessment. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) is set out below:

6.1.1 **Impact Statements** - The climate impact statements documented in both ES Chapter 15 Climate Change and Appendix 15.8.1 Climate Change Resilience Assessment of the ES are

lacking consistency in the way they are articulated in that some are missing an 'impact'. This end result is what should determine the consequence rating and could arguably have led to an underestimation of risk. The applicant should update all climate impact statements to end clearly with an identification of impacts. Risk ratings should be reviewed and revised accordingly.

6.1.2 **Mitigation/Adaptation** - The lack of identification of additional mitigation / adaptation measures is a key omission from the Climate Change Resilience Assessment and the Urban Heat Island Assessment. Whilst the applicant 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 identified above. The applicant should identify and include in the report further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change.

6.1.3 **Climate variables** - There was a lack of consideration of a number of climate variables including storm events, wildfire and fog, which is a key omission in the Climate Change Resilience Assessment. The applicant should give further consideration to the risks associated with these variables and include them in the report where appropriate.

6.1.4 **Risks** - The applicant should provide more information about the risk categories and definitions used for the Climate Change Resilience Assessment and Urban Heat Island Assessment and include the relevant risk frameworks in all documents (including the appendices) in which they are referenced.

6.1.5 **Route Map** - The applicant should make the link clearer between ES Chapter 15 Climate Change and Appendix 5.2.3 Mitigation Route Map and ensure they are consistent.

7.0 Greenhouse Gases

7.1 The Council has concerns about the methodology used to assess the impacts of the Greenhouse Gases (GHG) arising from of the NRP and the measures proposed to monitor and mitigate those GHG arising. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) is set out below:

7.1.1 **Guidance** - The applicant has not considered all the latest up-to-date guidance on this issue. There is no reference to PAS2080:2023 (publicly available standard Carbon Management in buildings and Infrastructure), nor the latest Intergovernmental Panel on Climate Change (IPCC) AR6 report. PAS2080:2023 places more emphasises on decisions and actions that reduce whole-life carbon more than PAS2080:2016 referred to in the report. The AR6 report considers many new updates concerning GHG Assessment, which should be reviewed.

7.1.2 **Baseline Information review** - The scope of the GHG emissions arising from airport buildings and ground operations does not cover maintenance, repair, replacement or refurbishment emissions. Therefore, this would under-count the operational GHG emissions.

7.1.3 **Assessment of significant effects** –

a. Airport expansion, demand management, and reliance on nascent technology are three key areas raised by the UK's Climate Change Committee (CCC) that could jeopardise the UK's net zero trajectory. The GHG Assessment fails to consider the risks of the Jet Zero Aviation Policy and how this could compromise the UK's net zero trajectory. CCC has raised this concern with the UK Government.
b. The GHG Assessment does not assess the cumulative impact of the project in the context of eight of the biggest UK airports planning to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels. This will greatly

increase the UK's cumulative aviation emissions, which may have significant consequences for the UK's net zero trajectory.

c. No carbon calculations were carried out in the ES for well-to-tank emissions, which is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard and goes against the UK Government's carbon accounting methodology from BEIS (2022). This results in a gross underestimation of the GHG emissions associated with aviation since an approximately 20.77% (BEIS, 2023) uplift would be required on all aviation emissions. This would result in 1,106,530tCO_2e not being accounted for in 2028 during the most carbon-intensive year.
d. It is not clear if a conversion was undertaken from CO_2 to CO_2e for aviation emissions, which would result in a 0.91% increase in all aviation emissions (BEIS, 2023).

7.1.4 **Mitigation, enhancement and monitoring** - Purchasing 'Renewable Energy Guaranteed of Origin' (REGO) certificates does not mean that GAL will receive 100% renewable electricity. In reality, on low wind and solar energy generation days, much of the electricity supplied on green energy tariffs still comes from fossil fuel production. Consequently, GAL cannot reply upon REGOs to justify its zero-carbon commitment.

7.1.5 **General** - The applicant does not confirm if they are committed to best practice by not demonstrating GAL's commitment to the Science Based Target initiative (SBTi), which would commit GAL to achieving a net zero trajectory aligned with the 1.5°C Paris Agreement across all emission scopes.

8.0 Traffic and Transport

8.1 The Council is relying on the technical expertise of West Sussex County Council (WSCC) as the Highway Authority, particularly regarding the transport modelling and mitigation for impacts on the highways, noting that WSCC is still fully assessing the transport modelling and will provide further comment on this aspect as part of the Local Impact Report.

8.2 In addition, the Council has concerns about the methodology used to assess the traffic and transport impacts of the NRP and the measures proposed to monitor and mitigate those impacts. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) are set out below.

8.2.1 **Legislation, policy and guidance** - The Traffic & Transport Chapter of the ES has been undertaken in accordance with rescinded guidance by IEMA, Guidelines for Environmental Impact Assessment of Road Traffic (1993). This was replaced in July 2023 by Environmental Assessment of Traffic and Movement. The ES should be reviewed against the latest guidance and as necessary amended.

8.2.2 **Baseline Data** - The use of 2016 data to inform the baseline assessment and the reasons for the use of this data, such as the impact Covid 19 had on travel, are noted. Since emerging from the pandemic more representative transport data continues to become available and therefore this data should be used to validate that the proposed approach is robust and takes accounts of changes since the 2016 base and any travel changes due to Covid 19. The applicant should also review the latest Department for Transport (D*f*T) guidance TAG Unit M4, Forecasting and Uncertainty, and ensure the modelling takes account of the latest D*f*T advice. Therefore, the Council is not yet satisfied that impacts on the Mid Sussex highway network have been robustly assessed and fully mitigated.

8.2.3 **Surface Access Commitments**

a. The applicant has made several 'Commitments' to increase staff and passenger sustainable travel mode share (Appendix 5.4.1). However, the targets for modal shift are not ambitious enough. It is not clear why the longer term targets cannot be secured through the DCO, bearing in mind the growth forecasts of the project look to 2047.

b. It is disappointing that there is not an updated Airport Surface Access Strategy (ASAS). This would provide more clarity as to exact surface access mitigations that are being delivered and clarity on how they will be secured.
c. The applicant has not done enough to support the provision of frequent and convenient alternative modes of transport for the residents of Mid Sussex. This is surprising given the role Mid Sussex has in providing the labour market for the project during construction and in operation. Significant numbers of residents will also use the airport as passengers.

8.2.4 **Parking** - The restriction and demand management of parking at the airport is one way in which the applicant is seeking to achieve modal shift. However, there is no robust assessment of current and future demand for car parking, looking at both on-site and off-site parking provision. Therefore it is not possible to make informed decisions about the levels of future car parking that will be required. Once this information is available, a robust, evidence-based Car Parking Strategy can be developed to properly manage parking provision in a way that supports the modal shift ambitions of the applicant.

8.2.5 **Parking Enforcement** - The Applicant's commitment to supporting local authorities' actions against unauthorised off-airport passenger car parking is welcomed. However, there is no detail of the scale of the support, to which local authorities it will apply and how it will be secured.

8.2.6 **Outline Construction Management Plan** - The Outline Construction Management Plan (Appendix 5.3.2) does not provide sufficient certainty that impacts from construction traffic on Mid Sussex highway network will be mitigated.

9.0 Socio-Economic

9.1 The Council has concerns about the methodology used to assess the Socio–Economic impacts arising from the NRP and the measures proposed to monitor and mitigate those impacts. Further details will be set out in the Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) is set out below:

9.1.1 **Baseline Data**

a. 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. Up-to-date baseline data should be sourced to inform assessments, including obtaining relevant data from local authorities.
b. The applicant should revisit its approach to estimating construction employment and forecasting availability of temporary accommodation given reliance on old data and not accounting for local variations.
c. The methodology used to assess of operational employment – direct, indirect, induced and catalytic should explain the approach to displacement and additionality assumptions.
d. The applicant should revisit sensitivity and magnitude gradings for several assessments in the socio-economic chapter.
e. 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 housing) 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.
f. The assessment of housing and population relies on out of date data. Up-to-date data should be used given it will impact on labour supply/housing conclusions. The assessment also makes optimistic projections on housing and does not appear to fully consider existing constraints.

9.1.2 **Economic Skills and Business Strategy** – This is generic, lacks detail and clarity and does not provide sufficient detail on, amongst other things: the local baseline; tailored local initiatives; outputs; and approach to monitoring.

10.0 Historic Environment and Landscapes

10.1 The Council is yet to be satisfied that there will not be more intensive use of flightpaths that are currently infrequently used (i.e. route 9/WIZAD). Therefore, the Council is concerned that noise impacts on heritage assets in Mid Sussex, including historic parks and gardens, have not been robustly assessed.

10.2 Equally, the Council is concerned that noise impacts on the High Weald Area of Outstanding Natural Beauty have not been robustly assessed. Appendix 8.4.1 sets out the methodology for the Landscape Townscape and Visual Impact Assessment.

10.3 The Council is not satisfied that the value of AONB has been correctly categorised in the assessment criteria (Appendix 8.4.1, table 2.2.1). It is the view of MSDC that assessment of tranquillity has underplayed the magnitude of change arising from increase in overflights in nationally designated landscapes (Appendix 8.4.1, table 2.2.7)

11.0 Draft Development Consent Order (dDCO)

11.1 The Council has wide-ranging concerns about the dDCO. These will be shared with the applicant in due course and will be set out in the Council's Local Impact Report. A summary of the Council's main concerns (which is not exhaustive) is set out below:

11.1.1 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);

11.1.2 the drafting of article 3 (development consent etc. granted by Order);

11.1.3 the drafting of article 9 (planning permission) and confirmation regarding which planning permission and conditions the applicant is concerned about;

11.1.4 the standard to which alternative routes must be provided under article 14(5) (temporary closure of streets);

11.1.5 the drafting of article 23, which concerns trees and hedgerows.

11.1.6 the inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development);

11.1.7 the drafting of several requirements (Schedule 2) including: the drafting of "start date" 11.1.7 (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 in R.19 (airport operations);

11.1.8 the 8-week deadline in Schedule 11 (procedure for approvals, consents and appeals) for determining significant applications (e.g. the waste recycling facility).

12.0 Planning Statement

12.1 The Council has several queries / concerns regarding the Planning Statement, including those set out in the following (non-exhaustive) list:

a. The Planning Statement sets out the various mechanisms that will be used to mitigate the impacts of the project. It provides further detail of the mitigations that will be secured. MSDC would want to be a signatory to legal agreements to secure the necessary mitigation.
b. how the changes mentioned in paragraphs 1.3.7 and 1.3.8 will be secured;
c. the legal and/or policy basis for the statement that it is "appropriate to use the policy framework of the [Airports National Policy Statement] as the primary framework against which the project as a whole should be tested" (paragraph 1.5.19);
d. why the Applicant considers the provision of hotels (Works 26, 27, 28 and 29) falls within the scope of the DCO regime. The same point applies to the proposed commercial space;
e. how the Flood Resilience Statement will be secured (paragraph 5.5.8 and Table 5.2);
f. whether an updated Mitigation Route Map will be prepared (stating, for example, which parts of the dDCO are relevant);
g. why highway improvements will not be in place and open to the public until after the northern runway comes into commercial use (paragraph 7.2.9);
h. why the Planning Policy Compliance Tables appear to make no reference at all to Local Plan policies (contrasting with the Manston DCO where, in the decision letter, the Secretary of State listed the Thanet Local Plan as an important and relevant matter in the context of policy compliance);
i. why there is no reference to Local Plan policies in the following sections: Air Quality (8.5); Noise and Vibration (8.6); Greenhouse Gas Emissions (8.7); Biodiversity and Ecological Conservation (8.9); Agricultural Land Use and Recreation (8.10); Resource and Waste Management (8.11); Flood Risk (8.12); Water Environment (Water Quality and Resources) (8.13); Historic Environment (8.14); Landscape, Townscape and Visual Resources (Visual Impacts) (8.15); Geology and Ground Conditions (8.16); Artificial Light, Smoke and Steam (8.17); Major Accidents and Disasters (8.18); Health and Wellbeing (8.19); Sustainability (8.20); Community Compensation (8.21); Community Engagement (8.22)
j. it is not clear whether the mitigation set out in section 8 (planning assessment) is sufficient;
k. the adequacy of the Employment, Skills and Business Strategy (ESBS) (paragraph 8.3);
l. it is not clear how the mitigation referred to in paragraph 8.17.11 (Artificial Light, Smoke and Steam) will be secured;
m. several queries about the claimed benefits of the project as set out in section 9 (planning balance and conclusions).

27.10.2023