



# **GATWICK AIRPORT NORTHERN RUNWAY PROJECT – DEVELOPMENT CONSENT ORDER (DCO)**

## **CRAWLEY BOROUGH COUNCIL - PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT (PADSS)**

**27 OCTOBER 2023**

## Introduction

This document has been prepared by Crawley Borough Council (CBC), with input from the joint authorities and appointed consultants where required. CBC is a host authority for the Gatwick Northern Runway Project, which was accepted by PINS for Examination on 3<sup>rd</sup> August 2023. This document identifies the initial principal areas of disagreement that have been identified when reviewing the Projects DCO documentation.

The Council appreciates this document is long; however, its length is a reflection of the scale of its major concerns with the application. In the light of these concerns, the Council considers the length of the document to be reasonable.

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## AVIATION CAPACITY, NEED AND FORECASTING

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	The capacity deliverable with the NRP Proposed Development	Modelling by GAL of the capacity deliverable with the NRP has assumed that 1 minute separations can be achieved between all departing aircraft using the two runways. This is not possible with the existing structure of SIDS, particularly given the commitment not to use WIZAD SID in the night period, and so additional delays to aircraft will arise so increasing delays above those stated in the Application documents. As a consequence the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.	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.	Uncertain – subject to GAL transparently undertaking and sharing the relevant simulation modelling.
2.	The forecasts for the use of the NRP are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for Transport forecasts and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.	The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (see point above). It is not considered good practice to base long term 20 year forecasts solely on a bottom up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport. In this case, top down benchmarking against national forecasts has failed to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand across the London system is reliant on the assumption that a third runway would be delivered at Heathrow.	Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick in competition with other airports, not limited simply to traffic, including that from other regions of the UK, that has historically used the London airports.	Uncertain – subject to GAL producing robust modelling to underpin its forecasts of demand.

<p>3.</p>	<p>Overstatement of the wider, catalytic, and national level economic benefits of the NRP.</p>	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</p>	<p>The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified. The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</p>	<p>Uncertain – subject to remodelling of impacts by GAL.</p>
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## PROJECT DESCRIPTION, EXISTING SITE AND OPERATION

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1. <b>Existing Site and Operation (CH4 – ES) and Project Description (CH5 – ES)</b>	Clarification of airfield boundaries and what the various plans show.	Lack of clarity about current airport boundary / operational airport boundary and extent of land needed for and controlled by the DCO. The boundaries need to be understood on drawings and in context of drafting of DCO to be clear on airport limits, any permitted development provisions and to ensure drafting of the DCO and requirements are effective and enforceable.	Revised plans to address these points showing for both existing boundaries and that proposed under the DCO.	High

## DESIGN AND ACCESS STATEMENT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	Lack of design quality controls and targets	Document has been prepared without any design ambition or commitment to measurable standards.	There needs to be clear commitments to meet required policies and design standards, ensuring minimum compliance with the adopted Local Plan.	Uncertain
2.	Indicative status of majority of DAS and lack of 'design fix'.	Appendix A1 is an inadequate Control document of insufficient detail.	Applicant needs to work up more elements of the project in detail to enable more certainty on design of development. The design control document needs to contain much greater detail.	Uncertain
3.	Lack of detail in document including lack of site context analysis, site constraints and opportunities (also lacking from ES Project Description)	Some aspects of development excluded from D and A document, also a general lack of contextual analysis including site opportunities and constraints. Insufficient information on design and visual impacts. This is of particular concern in environmentally sensitive locations.	More detailed design work required to ensure design quality, protection of visual amenities and more information to form any 'control' document. More certainty and detail needs to be agreed now to safeguard sensitive works sites and sensitive environmental assets.	Uncertain
4.	Inconsistencies in documents within DAS and in relation to other supporting documents.	Conflicting descriptions and cross- referencing lead to uncertainty over what is proposed and which details should take precedent.	Updates and corrections needed for consistency and certainty	High

<p>5. Section 7 and dDCO</p>	<p>Lack of defined parameters for some development and lack of on parameter plans and within Schedule 12 Control documents.</p>	<p>All development should have defined parameters for all elements including soil deposition and temporary storage areas</p>	<p>Without agreed parameters for all the development it is questionable how design details can be controlled. The applicants have not explained this. This is a complex project with some build elements being EIA scale development in their own right. Ensuring sufficient control over the numerous design elements of such a substantial project is considered essential.</p>	<p>Uncertain</p>
<p>6. Section 9</p>	<p>Lack of detail on construction phasing</p>	<p>Need for further understanding on sequencing and co-dependencies between the project elements to ensure appropriate phasing and control of the development and ensure mitigations in place.</p>	<p>Further detail needed to that a comprehensive phasing plan can be agreed and to ensure all impacts from that phasing and implementation are understood and can be mitigated.</p>	<p>Uncertain</p>
<p>7. Control Document OLEMP</p>	<p>Safeguarding of existing landscaping and protection of visual amenities</p>	<p>Lack of detail on landscape protection measures and zonal approach proposed in document is too vague giving inadequate control to safeguard impacts.</p>	<p>Significant detail needs to be added to these documents now to identify all important trees, hedges and landscape assets that could be impacted by the development. Mitigation principles need to be agreed now.</p>	<p>Uncertain</p>

## LANDSCAPE, TOWNSCAPE AND VISUAL IMPACT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	Absence of tree mitigation strategy or any acknowledgement of CBC requirements under policy CH6 in the adopted Crawley Borough Local Plan	There is no recognition of the landscape impact from the loss of trees within the DCO area and no robust measures to mitigate tree removal. Applicant needs to address this key policy and respond in this document and control documents to provide adequate mitigation. Applicant's development should comply with the requirements of policy CH6.	Applicant needs to address this key policy provide adequate mitigation to comply with the requirements of policy CH6.	Uncertain
2.	Lack of controls over visual impacts for some key project sites which are in sensitive locations including those near rights of way or close to the site boundary.	Concerns held that there is no control in relation to the townscape /landscape impact (both overall scale, landscape loss and lack of understanding of context) to ensure that future development does not harm the character of the area.	Additional information to be provided and associated mitigation to be reviewed and amended.	Uncertain
3.	Draft Development Consent Order, Requirements and Schedule 11 documents	Concern remains in relation to the controls to ensure the visual impacts of the development are appropriately mitigated.	Applicant to provide further information in relation to proposed landscape and visual impacts and further discussion and agreement needed on DCO wording.	Uncertain
4.	Planning Statement Para 8.17.11	It is not clear how the mitigation referred to in para 8.17.11 (Artificial Light, Smoke and Steam) will be secured.	Applicant to provide further information	Uncertain.



## HISTORIC ENVIRONMENT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1. Code of Construction Practice ( <a href="#">CoCP: Document 5.3.2</a> )	Management of Historic Environment effects.	Section 5.2 (Historic Environment) of the Code of Construction Practice does not reflect the work proposed. The objective should be to protect or mitigate the setting of built heritage and the recording of affected archaeological deposits.  Section 6.1 (Roles and Responsibilities) does not detail a Heritage Clerk of Works.	Further information is needed which should be related to the methodology proposed within the submitted Written Scheme of Investigation (Document 5.3, Appendix 7.8.2).  A Heritage Clerk of Works should be appointed to manage the heritage and archaeological facets of the project.	High.
2. Environmental Statement ( <a href="#">Chapter 7: Historic Environment</a> )	Lack of historic background to the airport.	No clear understanding or description of the history of the airport development.	Provide an appropriate history of the development of the airport from the first half of the 20 <sup>th</sup> century and relate this to the potential archaeological impact of the scheme and where areas may be disturbed.	High
3. Environmental Statement ( <a href="#">Chapter 7: Historic Environment</a> )	Lack of archaeological evaluation within the airport perimeter.	The scheme of archaeological investigation undertaken prior to the submission of the DCO application has been focused on areas within the proposed development that were easily accessible and has not covered all potential areas of impact.	Appropriate commitment (with description and methodology) given within the Written Scheme of Investigation (Document 5.3, Appendix 7.8.2) to undertake investigations in all areas under threat from the proposed development, which have not been shown to have been disturbed/destroyed by previous development.	High
4. Document 5.3, Appendix 7.8.2	Proposed mitigation on areas already evaluated.	There is concern that the proposed mitigation identified within the WSI on areas that have been evaluated is not sufficient and will need to be expanded.	Improved and expanded mitigation strategy within the WSI.	High

5. Document 5.3, Appendix 7.8.2	Proposed building recording of control tower.	Proposed level 2 recording not appropriate for this type of rare structure.	Needs to be increased to a level 3 record and should be identified as a heritage asset.	High
6. Document 5.3, Appendix 7.8.2 and Code of Construction Practice ( <a href="#">CoCP</a> : Document 5.3.2)	No proposals for heritage community outreach which would normally be expected from a development of this nature.	No potential heritage community engagement identified in section 4.12.	Identify an outreach programme to inform the local area and heritage community of the results of the archaeological work.	Uncertain
7. Document 5.3, Appendix 7.8.2	There needs to be clarity within the documentation on the role of the local authority archaeologist in signing off the archaeological mitigation.	The submitted documentation fails to define a procedure for the monitoring and signing off of the archaeological and building recording mitigation works.	Clear sign off procedure needed, detailed within Written Scheme of Investigation.	High
8.	Impact on setting of nearby listed heritage assets	There is no evidence in this submission that the setting is not harmed though visual impact or light impacts.	Evidence to be provided and further information needed to understand how the proposed control documents such as the Design and Access Statement and Lighting strategy address these impacts / provide adequate safeguards for these assets.	Uncertain

## AGRICULTURAL LAND USE AND RECREATION

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1	Quality of and impacts upon existing recreational routes affected by the DCO works during and post construction	Lack of detail on the impacts on existing recreational routes as result of the works and the measures proposed to protect users (e.g., lorry routing, dust, damage to surfacing). Lack of detail or acknowledgement of potential opportunities to enhance and improve these routes for benefit of local community and for promotion of active travel.	Further detail needed on impacts and mitigations during construction and information on reinstatement and potential enhancements. Detail required to ensure rights of way remain open and safe to use.	Uncertain
2.	Appropriateness and adequacy of the proposed open space and recreation provision	Car Park B - Whether location is appropriate and lack of detail on the quality amenity benefit, function purpose, use and management. Museum Field – quality of provision/ usability of space and connectivity with surroundings.	Further detail needed on routes and linkages, landscaping, signposting, amenity benefit, function, timing and delivery purpose and management of these spaces	Uncertain

## ECOLOGY / NATURE CONSERVATION AND ARBORICULTURE

Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	The extent of loss of mature broadleaved woodland (net loss over 5 ha)	Although some woodland will be re-planted along the new highway alignment it will be years before bat foraging and roosting habitat, and habitat connectivity are fully reinstated. The assessment concludes there is a significant effect on bat behaviour until new woodland planting had established. Current mitigation and compensation measures are insufficient to maintain bat foraging habitat and commuting routes over the short and medium term.	The Applicant should seek additional compensation measures, if necessary off-site, to ensure no adverse impacts on broadleaved woodland habitat and bats.	Uncertain
2.	Lack of approaching assessing and addressing ecological impacts at a landscape scale	Ecological impacts will extend beyond the DCO limits with potential impacts on bat populations, riparian habitats downstream of the Airport and the spread of non-native aquatic species. Disturbance and habitat severance within the Airport will impact the functioning of wildlife corridors, notably bat commuting routes, both within the Site and the wider landscape. Maintenance of habitat connectivity across the airport and wider landscape remains a concern.	The Applicant should adopt a landscape scale approach to assessing and addressing ecological impacts, including the need to provide off site mitigation, compensation and Biodiversity Net Gain. Enhancements are required to green corridors and improved habitat connectivity to extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	Uncertain
3.	Lack of opportunities for biodiversity enhancement	Many potential opportunities for biodiversity enhancement, both within and outside the DCO limits, were never explored.	Explore further opportunities for biodiversity enhancement e.g., conversion of 'amenity grassland' on road verges and roundabouts to wildflower grassland, and the improved management of Gatwick Stream and Crawler's Brook.	Uncertain
4.	Need for security of long-term positive management of the two biodiversity areas - the North West Zone and Land East of the Railway Line.	These areas are of considerable biodiversity value and key components of the ecological network. Any loss or degradation could have significant impacts on the effectiveness and viability of the proposed mitigation areas.	A legal commitment to provide certainty that these two biodiversity areas will continue to be managed for wildlife	Uncertain

<b>Arboriculture</b>				
5.	Evidence for null findings of ancient or veteran trees, as well as important hedgerows.	No demonstration that these receptors have been appropriately surveyed, nor followed appropriate methodology.	Demonstrate the methodology used to survey and identify potential ancient and veteran trees as defined by the NPPF (2021) which could be impacted within or surrounding the project boundary, as well as providing the survey data findings (including for important hedgerows).	Uncertain
6.	Lack of demonstration that arboricultural features have been considered, designed for and appropriately avoided, mitigated or compensated for.	Potential impacts multiple to arboricultural features of unknown value.	Provide a full arboricultural assessment for all arboricultural features in line with BS5837:2012 (inclusive of an impact assessment, outline method statement and tree protection plans).	Uncertain
7.	The OLEMP and CoCP do not demonstrate appropriate outline methodology for tree protection and ancient woodland buffer zones.	Potential impacts multiple to arboricultural features due to a lack of tree protection.	Produce an arboricultural assessment and tree protection measures referred to within the OLEMP and/or CoCP.	Uncertain
8.	The OLEMP does not provide clarity that detailed arboricultural method statements and planting plans and aftercare management will be provided within proposed LEMPs.	Potential impacts multiple to arboricultural features due to a lack of tree protection, and unclear proposed compensatory soft landscaping.	The OLEMP should identify that the following will be produced in detail, and refer to best practice or guidance in which they should adhere to: arboricultural method statements; tree protection plans, tree/vegetation removal plans and tree work schedules; detailed planting and specification plans; and, planting aftercare and management plans.	Uncertain
9.	Inadequate consideration and demonstration for the protection of ancient woodland. Conflicting with the finding of 'no impact' occurring to these receptors.	Potential impact to ancient woodlands receptors where barriers are specified to form buffer zone protection. This is of principle concern for Horleyland Wood due to the adjacent proposed works area for the new foul water pipeline.	Where barriers are specified to form buffer zone protection, spacing/distance of buffer should follow recommendation withing statutory guidance provided by Natural England and Forestry Commission 2022. The specification and methodology for the proposed barriers and need to be demonstrated. Further, the appropriate positioning of barriers needs to be identified on tree protection plans.	Uncertain
10.	Compensation strategies for tree, woodland and hedgerow loss not demonstrating adequate compensation, and that proposed compensation being recognised as a significant long-term impact.	The net loss of woodland, the fragmentation of habitat connectivity, and the long-term effect from the time required to establish new planting.	An increased compensation strategy for compensatory woodland planting.	Uncertain

## WATER ENVIRONMENT

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	In respect of the overall drainage strategy CBC remain concerned that the concept designs did not provide sufficient. It would be helpful if GAL could share the Consultee comments from key stakeholders such as the Environment Agency to understand how aligned or otherwise, they are with our views on the drainage and FRA work done to date. It was not clear how all this has progressed from the PEIR consultation.	These need to be circulated in advance before the TWG if meaningful feedback is expected.	CBC would like to see the evidence behind the FRA work that underpin the concept design.	Low
2.	Drainage – South Terminal Roundabout substantial modification to surface water pond.	CBC request the design parameters for the new pond are provided if this proposal is to be taken forward along with details of the changes that will be carried out on the existing pond, the impact and mitigation measures and most importantly, of how water quality has been addressed in accordance with the SuDS manual	CBC and other stakeholders would like to see the design parameters for the new pond and the mitigation measures put in place	Low
	The Updated flood compensation plan shows that there will be a reduction in size of (i) the Museum Field and Car Park X flood compensation areas, (ii) removal of the flood compensation area to the south of Crawley Sewage Treatment Works and the small area to the east of Museum Field and (iii) the removal of the surface water drainage Pond A and the extension to Dog Kennel Pond from the initial proposal of GAL to provide additional flood storage.	CBC has insufficient detail to accept the assumptions set out in this update and request that it is provided with further information	A simple tabulated hydraulic model report showing the comparison between the storage requirement of the 35% and 20% event. This should support the explanation of how this reduction was arrived at and help to demonstrate the practicality of this scenario	Low

3.	Evidence to show that the connection between the museum field compensation storage area and the river Mole will not have a detrimental effect on the geomorphology of the watercourse bed.	CBC also requests confirmation of how the possible adverse effect of this connection will be mitigated	CBC would like to see the evidence of the work done in this area and a plan showing how any identified adverse effect on the watercourse geomorphology will be mitigated.	Low
4.	CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y.	Car Park X and Y works may have potential negative impact on nearby buildings	Can further details be provided of what these works consist of and what the impacts are.	High
5.	GAL has proposed an additional three hectares of carriageway will be created from the proposed work to the highway and three attenuation basins and two oversized pipes have been planned as part of the highway drainage strategy to mitigate the increase in impermeable area	The proposal can be improved, and this should be an opportunity for GAL to improve on the sustainability aspect of the Highway and in addition to water quantity provide water quality mitigation strategy in line with the SuDS manual, this should not be a case of just doing the minimum.	An improved proposal with more done around water quantity and quality mitigation.	Low
6.	While it is understood that there is the need for GAL to attenuate water using systems that can be designed to reduce the attraction of birds	The use of concrete attenuation structures if possible be avoided.	the use of a more sustainable approach with reduced carbon footprint will be the preferred option rather than using designs with a high carbon footprint.	High
7.	Residual risk when flood structures are overwhelmed.	While Gal has proposed several mitigation strategies as it relates to flood risk, how they intend to deal with possible residual risks in the event these structures are overwhelmed or a possible blockage on the watercourse should be identified.	The residual risks should be identified, and proposals put in place to address them	Low
8.	The proposed highway drainage strategy will reduce discharge by 38% to the Gatwick stream and 50% to the river Mole	Can GAL have a look at the effect this reduction in discharge will have on biodiversity and provide mitigation where necessary	CBC would like to see the evidence of the work done in this area and a plan showing how any identified adverse effect on the biodiversity of the ecosystem will be mitigated.	Low
9.	Overlap between drainage and ecology matters in relation to the	It would be good to understand the impact the drainage design and	Further information should be provided on the management of both the drainage	Low

	northwest area and the impact on the river Mole	engineering solutions have on ecology in relation to matters such as sediment build up, flood overflow, de-icer storage and pollution control measures.	features and ecological mitigation measures.	
10.	Capacity of Crawley Sewerage Treatment Works	No confirmation to date from Thames Water regarding the impact and capacity of the Crawley STW, taking into account other planned development in Crawley. If upgrades to the Works are deemed necessary, no clarity on whether this could impact on phasing for other developments	Confirmation from Thames Water	Uncertain
11.	Water demand mitigation	No specific water use targets, and no commitments to ensure sufficient measures are delivered to mitigate water supply impacts in an area of water stress	Commitment to specific targets and defined measures	Uncertain



## TRAFFIC AND TRANSPORTATION

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
<p><b>The Council also endorses the PADSS submitted by West Sussex County Council as the Highway Authority particularly regarding the transport modelling and mitigation for impacts on the highways which are not repeated here.</b></p>				
1.	Surface Access Commitments - target mode shares	Insufficient evidence and justification provided to demonstrate how the target mode shares will be achieved. Stronger commitment to the aspirational mode shares should be made.	SACs and associated mitigation to be reviewed with more clarity on specific sustainable travel improvements	Uncertain
2.	Surface Access Commitments - rail	High rail mode shares are critical to the SACs but there are no measures to enhance rail services or further improve the station, despite the evidence demonstrating services on the Brighton Mainline will be overcrowded with just standing capacity available and the station will be congested at times.	Provide funding to support rail improvements	Low
3.	Surface Access Commitments – Active Travel connections	Enhancements to routes beyond the immediate airport connecting to wider networks, particularly improvements to NCR21 south to Crawley are essential to meet staff mode share targets, given how low current AT mode share is.	Provide improvements to active travel connections (or funding for these)	Uncertain

4.	Surface Access Commitments– Bus services	Commitments made in relation to bus and coach service provision should include Route 200 (from Horsham, through Crawley’s western neighbourhoods and Manor Royal to Gatwick Airport). Bus priority measures across the network to reduce journey times should also be included	Provide bus priority measures on the wider network (or funding for these). Fund improvements to Route 200.	Uncertain
5.	Surface Access Commitments - Funding	No indication of scale of funding for the Transport Mitigation Fund, nor the nature and scale of funding for off-airport parking enforcement. Commitment to continue the parking levy to support the Sustainable Transport Fund is welcomed but the amount per space needs to increase to compensate for the proportionate decrease in staff and passenger parking.	Clarify nature and scale of funding.	High
6.	Surface Access Commitments – enforcement	The proposed monitoring framework does not demonstrate how remedial action, should it be necessary, will be secured nor what sanction will be in place should commitments remain unmet.		Uncertain
7.	CoCP and OCTMP	Concern about the lack of detail and clarity in the CoCP and CTMP, including no information regarding the criteria when and how much contingency routes will be able to be used.	Additional information to address these concerns is required.	Uncertain
8.	Methodology used to identify amount of new passenger parking	Unclear what methodology has been used to identify the overall increase in parking numbers,	Information should be provided detailing how the proposed increase of 1,100 passenger spaces has been identified, and how this relates to passenger numbers within the context of the airport operator achieving its sustainable transport mode share obligations.	High
9..	Staff Parking Numbers	Whilst supporting the objective to increase staff travel by sustainable modes, it is not clear how the 1,150 space reduction in staff parking relates to sustainable mode share objectives especially since there will be more staff at the airport as a result of the project.	Information should be provided detailing how the proposed loss of staff spaces fits with more staff due to the project, and having regard to sustainable transport mode obligations.	High

10.	Passenger parking offer and pricing	Unclear if GAL intends to offer a range of parking at different price levels – this is important to ensure a balanced approach between supporting sustainable transport mode share and offering an appropriate range of on-airport parking for those who do need to drive (on-airport parking being more sustainable than off-airport parking)	The applicant should detail the range of parking products that will be retained following the reallocation of spaces, detailing how this fits with its wider sustainable mode share obligations.	High
11.	Robotic parking as a baseline assumption	Do not agree with the applicant's assumption that 2,500 robotic parking spaces can form part of the baseline. This would significantly increase parking capacity beyond the 100 space temporary three-month trial and would significantly increase parking capacity, the full highway impact of which would need to be properly assessed.	The applicant should not be assuming for an increase of 2,500 passenger spaces in its baseline.	Low
12.	Updated Staff Travel Survey	CBC note that GAL has now received initial results from its updated 2023 staff travel survey.	The most up-to-date evidence on staff travel should be feeding into the DCO evidence base.	High

**AIR QUALITY**

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	Air Quality and Emissions Mitigation Guidance for Sussex	The applicant has not clearly demonstrated regard to the Sussex Air Quality and Emissions Mitigation Guidance or the Defra air quality damage cost guidance in assessing air quality impacts and mitigation measures. The health/damage costs are not included in the DCO Documents despite confirmation from the applicant that they would be undertaking a TAG (Transport Analysis Guidance) assessment which would identify the air quality damage costs of the Project. The underlying rationale of the Sussex Guidance is to quantify health damage costs associated with the transport emissions from the proposed development (NO <sub>2</sub> , PM <sub>10/2.5</sub> ) in order to offset these damages to protect human health. This approach is in line with the principals of Defra's Clean Air Strategy.	The TAG assessment identifying the air quality damage costs of the Project should be clearly presented in the application documents in order to help understand the effective and necessary mitigation needed to protect human health alongside supporting economic growth.	Uncertain
2.	Air Quality Action Plan (AQAP)	No AQAP has been provided which clearly sets out a range of measures to specifically address local air quality. Instead, the applicant has addressed air quality through the carbon action plan (CAP) and the airport surface access strategy (ASAS). This approach differs from discussions during 2 years of consultation where a draft AQAP was provided in the air quality TWG (21.10.22) and an AQAP was listed in item 19 of Schedule 2 (Requirements) of the draft DCO (28.04.23).	A combined operational air quality management plan should be provided which specifically focuses on local air quality, and which draws together measures aimed at local mitigation to reduce the health impacts from emissions, in addition to those outlined in the SAS and the CAP.	Uncertain

		<p>The CAP and ASAS do not specifically or adequately address air quality mitigation measures based on health, and both lack the means to measure short-term exposure or provide monitoring to check compliance.</p> <p>CBC has concerns that the lack of a dedicated AQAP will undermine its ability to fulfil its own LAQM requirements and is not consistent with Defra's Air Quality Strategy.</p>		
3.	Dust Management Plan (DMP)	No DMP has been provided which clearly sets out specific mitigation measures to ensure potential adverse impacts from construction dust are avoided during all construction stages.	The applicant proposes a DMP once detailed design plans are available. However, there is no reason why a DMP or outline DMP cannot be produced at this stage since construction compound locations and transport routes have been provided. A DMP is therefore requested for the examination, and to provide additional confidence in the control measures and monitoring for the construction phase.	Uncertain
4.	Construction Traffic Management Plan (CTMP)	Section 6.5 of the CTMP (Restrictions and Monitoring) identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. However, no details on this monitoring system are provided to help understand how this would protect air quality. It is also unclear if the plan takes into account additional traffic associated with the natural growth of airport traffic, or additional traffic growth associated with the additional capacity already created in the first phase of construction.	Further details are requested during the examination on the proposed monitoring system and how this would protect air quality in Crawley's AQMA. More clarification is required regarding the additional traffic that would be expected in the future situation.	Uncertain
5.	Operational Air Quality Monitoring	CBC has concerns regarding the measurement accuracy of the AQ Mesh low-cost sensors which the applicant is proposing to use to monitor operational phase impacts. AQ Mesh monitors are not	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 exceed short term limits or deteriorate	Uncertain

		approved by Defra for the monitoring of air quality in line with Local Air Quality Monitoring guidelines (equivalence reference method criteria for continuous monitoring) particularly with regards to short term level exceedances. As such they are not sufficient to demonstrate compliance with air quality standards. This introduces uncertainty on how air quality will be evaluated and reported to the council, which in turn reduces transparency on the effectiveness of measures relied upon to improve air quality.	further than predicted. CBC would welcome a commitment from the applicant to use monitoring equipment that meets the equivalence reference method.	
6.	Funding for Local Ambient Air Quality Monitoring	The ES does not specifically identify which of the existing LA continuous air quality monitoring stations on and around the airport will be funded. The LAQM process requires a LA with a major airport in its district to carry out an assessment of sensitive receptors within 1000m of the airport. Therefore CBC has an air quality monitoring station located on the eastern perimeter of the airport to provide independently measured pollution data for this assessment for Crawley residents living close to the airport who are impacted by airport emissions.	Further clarification is requested on funding of the LA monitoring stations on and around the airport.	Uncertain
7.	Uncertainty and Controlled Growth	There is insufficient information and a lack of sensitivity testing to clearly demonstrate how differing levels of modal shift attainment could impact future air quality predictions. CBC has concerns over whether the modal shift can be achieved, and if this is not achieved what the air quality effects may be.	Further information is needed to understand how reliant on modal shift assumptions future air quality predictions are. Further information on the performance indicators to deliver against targets, and how the monitoring strategy should be linked to controls if modal shift targets aren't met.	Uncertain
8.	Assessment Scenarios (including 2047 Full Capacity)	The scenarios assessed in Chapter 13 of the ES (Listed para 13.5.23) do not provide a realistic worst-case assessment. This is particularly the case for those scenarios	Clarification is required as to how the selection of assessment years and their configuration re operational and construction was made and	Uncertain

		<p>where both construction and operational activities are underway at the same time, but the assessment has treated them separately.</p> <p>The same concerns apply to the emissions ceiling calculations as to how realistic these are, particularly when there are construction and operational activities ongoing, and the emissions ceiling calculations treat these separately.</p> <p>In addition, there is no operational assessment for the final full-capacity assessment year of 2047, as per ANPS (para 5.33) which identifies the need to include assessment when at full capacity.</p>	<p>how this aligns with the requirements of the ANPS.</p> <p>A modelled assessment for the final full-capacity assessment year of 2047 is requested.</p>	
9.	Ultrafine Particles (UFPs)	<p>The discussion on the health impacts of ultrafine particles (UFPs) from aviation sources within the ES (Chapter 18 para 18.8.66) is welcomed. However, although the applicant supports the monitoring of UFPs and commits to participating in national industry body studies of UFP emissions at airports, it is unclear if their commitments extend to supporting a local monitoring study.</p>	<p>CBC would welcome further investigation into the impact of UFPs in the local area, through ongoing monitoring around the airport to help support the case for reducing emissions in line with GALs sustainability statement and protecting health in line with Defra's Clean Air Strategy.</p>	Uncertain
10.	CARE Facility	<p>There were continuous issues with odour from the current small waste incineration plant at the CARE facility until it was "mothballed" in 2020. The odour was mainly associated with the biomass fuel which produced a sweet-smelling aromatic hydrocarbon odour. There are concerns that this may be repeated at the new CARE facility which proposes to double in size.</p>	<p>Further clarification is requested on the type and size of incinerators that are proposed and how odour will be controlled.</p> <p>Information is requested on what steps have been taken to address inadequacies with the current odour control technology to ensure odour will not be a factor in the new facility.</p>	Uncertain
11.	Technical Details	<p>There are concerns that a realistic worst case has not been assessed due to insufficient information or clarity on a range of technical details in the ES and associated documents, including how</p>	<p>Further information is requested on rates of future air quality improvement, pollutants assessed, construction plant (asphalt plant numbers of modelled concrete batching plants), heating plant and road traffic</p>	Uncertain

		modelled work using ADMS/ADMS Airports is presented.	modelling to help understand if the worst case has been assessed.  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).	
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## NOISE AND VIBRATION

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Legislation, policy and guidance</b>				
1.	Local planning policies	Local planning policies are covered in Table 14.2.2 but no information is provided on how these policies are addressed in the ES.	Details should be provided on how local planning policies are addressed in the ES.	High
<b>Assessment of significant effects – Construction Noise</b>				
2.	Assessment periods	Table are provided for daytime and night-time construction noise predictions. However, no identification of evening construction works has been provided.	Details of any evening works should be provided	High
<b>Assessment of significant effects – Construction Vibration</b>				
3.	Assessment of vibration effects from road construction	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.	Vibration effects from vibratory compactors and rollers used in highway works should be assessed	High
<b>Assessment of significant effects – Air Noise</b>				
4.	No assessment criteria is provided for the assessment of effects on non-residential receptors	Assessment criteria based around the LOAEL and SOAEL focuses 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.	Provide an assessment of likely significant air noise effects on non-residential receptors.	High
5.	Only 2032 assessment year is assessed as a worst-case	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.	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Uncertain

6.	No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary LAmax, overflight, Lden and Lnight noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.	Provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant identifying a likely significant effect.	Uncertain
7.	No details of the noise modelling or validation process are provided. No details of measured Single Event Level or LASmax noise data from the Noise-Track-Keeping are provided	It is difficult to have any confidence in the noise model without any provision of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours. Measured Single Event Level and LASmax noise data should be provided for individual aircraft variants as it is key information used when defining the aircraft noise baseline.	Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided. This should include Single Event Level and LASmax noise data for individual aircraft variants at each monitoring validation location.	Uncertain
<b>Assessment of significant effects – Ground Noise</b>				
8.	The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment. It is not clear why 2032 is considered worst-case for ground noise. Ground noise contours are not provided.	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. Whilst 2032 provides the highest absolute noise levels, there appears to be larger increases in noise at some receptors during other assessment years. Noise contours have been provided for aircraft noise and road traffic noise, but no noise contours are provided for ground noise. These contour plots should be provided to allow better understanding of ground noise effects for each assessment year and scenario. It would be expected that LAeq and LAmax contour plots are provided.	An assessment of Slower Transition Case ground noise effects should be provided to identify the potential for exceedances of the SOAEL at sensitive receptors. Likely significant effects for all assessment years should be identified in the ground noise assessment. Provide LAeq and LAmax noise contour plots to supplement the ground noise assessment. Contour plots should be provided for Do-minimum and Do-something scenarios for each assessment year.	High
<b>Assessment of significant effects – Road Traffic Noise</b>				

9.	Noise monitoring duration	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.	Longer term monitoring, close to the A23 or M23 where road traffic noise can be said to dominate over aircraft noise, would be preferable. Alternatively, the applicant could explain what steps they have taken to independently validate the road traffic noise calculations.	Uncertain
<b>The Noise Envelope</b>				
10.	Sharing the benefits	<p>Paragraph 14.2.44 – sharing the benefits has been removed from the ES. This is a fundamental part of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities.</p> <p>There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the Noise Envelope allows for an increase in noise contour area on opening of the Northern Runway.</p> <p>The Applicant wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope.</p>	<p>Details on how noise benefits are shared should be provided in accordance with policy requirements set out in the Aviation Policy Framework.</p> <p>Noise contour area limits should be based on the Central Case.</p> <p>There should be no allowance for the Noise Envelope limits to increase</p>	Uncertain
11.	CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for host authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope.	A mechanism should be included to allow the host authorities to scrutinise noise envelope reporting and take action in the case of any breaches	Uncertain
12.	Prevention of breaches	A breach would be identified for the preceding year, with an action plan in place for the following year. Consequently, it would be two years after a breach before a plan to reduce the contour area would be in place. No details are	<p>More forward-planning needs to be adopted to ensure that action plans are in place before a breach of the noise contour area limit occurs.</p> <p>Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in</p>	Uncertain

		<p>provided on what kind of actions are proposed for an action plan to achieve compliance. 24 months of breach would be required before capacity declaration restrictions for the following were adopted so it would be three years after the initial breach before capacity restrictions were in place. Capacity restrictions would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year.</p>	<p>the noise envelope. Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation</p>	
<b>Noise Insulation Scheme</b>				
13.	Noise insulation scheme details	<p>How would the noise insulation scheme prioritise properties for provision of insulation. Residents of properties within the inner zone will be notified within 6 months of commencement of works; however, it is not clear what noise contours eligibility would be based upon. Is noise insulation in the Outer Zone restricted to ventilators or will the occupier have flexibility to make alternative insulation improvements? Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings (e.g. care homes, places of worship, village halls, hospitals etc.) would be eligible for noise insulation. It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.</p>	<p>Provide details on how the scheme would roll out. Clarify what noise contours would be used to define eligibility. Clarify on the flexibility of the noise insulation scheme. Provide details on what community buildings would be eligible for noise insulation and what level of insulation would be provided. Provide details on how monitoring of ground noise would be undertaken and how a property would be identified as appropriate for monitoring of ground noise.</p>	Uncertain.

## CARBON AND GREENHOUSE GASES

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Legislation, policy and guidance</b>				
1. Environmental Statement Chapter 15 Climate Change	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/CORISA.	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/CORISA.	Can the Applicant please confirm in the need case for the scheme if it considered the impact of ETS/CORISA?	High
2.	UK Climate Change Committee (CCC) Progress in reducing emissions report, published in June 2023.	The Climate Change Committee (CCC) plays a crucial role in monitoring the UK's progress towards its legally binding carbon budgets and emissions reduction targets under the Climate Change Act 2008. The latest CCC Progress Report (2023) identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero. See Page 267, 'Airport expansion' bullet point of the latest report <sup>1</sup> .	The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory	High
<b>Baseline Information review</b>				
3.	GHG emissions from airport buildings and ground operations in the ES [TR020005] (Table 16.4.1) does not appear to include maintenance, repair, replacement or refurbishment emissions.	The scope of the GHG emissions from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment emissions. This would under account operational GHG emissions. It is not clear what is captured under "other associated businesses".	The Applicant needs to clarify if maintenance, repair, replacement or refurbishment emissions were calculated and, if not, justify why. Can you please explain what emission sources are defined under "other associated businesses".	High

<sup>1</sup> <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>

Assessment of significant effects				
4.	<p>The ES [TR020005] fails to consider the risks raised by the CCC's expert advisory panel, which warns that the UK jet zero policy is non-compliant with the UK's net zero trajectory. Therefore, the conclusion of ES is not in alignment with the IEMA (2022) GHG Assessment Guidance.</p>	<p>The CCC, in their latest progress in reducing emissions publication (June 2023) and previous publications, raised serious concerns over the UK Jet Zero policy as summarised in Page 267, 'Airport expansion' bullet point of the latest report<sup>2</sup>.</p> <p>The GHG aviation methodology has resulted in a lack of transparency with regard to the emissions relative to the without Project Scenario since by 2047, there will be an increase of around 60,922 Annual Aircraft Movements as presented in Table 3.7.1 of the ES [TR020005]. The GHG Assessment conceals the emissions by applying emissions reductions from the Jet Zero High Ambition scenario.</p> <p>Therefore, based on the 'high risk' of the Jet Zero High Ambition Scenario not being achieved, emissions from the Project will be significantly higher than the baseline scenario. Hence, based on the advice from the CCC, it would suggest that the expansion of the GAL airport and increase in demand is not in line with the UK's net zero trajectory.</p>	<p>The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p>	High
5.	<p>In the Cumulative Effects Section 16.10 of the ES [TR020005], no assessment of cumulative UK airport expansion emissions has been considered on how this will impact the UK's net zero trajectory.</p>	<p>The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels<sup>3</sup>. This Figure is not up to date as Gatwick is proposing to increase its operating capacity to 80.2 million passengers per annum, which would make the total Figure &gt;150 million more</p>	<p>The Applicant needs to provide an updated cumulative assessment that considers the combined impact of all major UK airport expansions and how this could impact the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p>	High

<sup>2</sup> <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>

<sup>3</sup> <https://www.ft.com/content/52cdd536-103b-4db0-91c5-f1337be47baa>

		<p>passengers a year by 2050 relative to 2019 levels.</p> <p>As discussed above, airport expansion, demand management, and reliance on nascent technology are three key areas raised by the CCC that could jeopardise the UK's net zero trajectory. A significant increase of &gt;150 million passengers will greatly increase the UK's cumulative aviation emissions, which may have significant consequences on the UK's net zero trajectory.</p>		
<b>Conclusions</b>				
6.	No consideration is provided in the ES around the risk of the Jet Zero Strategy and the impact this would have on the significance of the assessment.	Group for Action on Leeds Bradford Airport and Possible submitted a judicial review in October 2022 of the UK Aviation Jet Zero strategy. The CCC has consistently stated that the Government needs to " <i>implement a policy to manage aviation demand as soon as possible</i> " <sup>4</sup> . The GHG Assessment does not acknowledge any of these concerns and risks of the Jet Zero strategy, which the GHG Assessment hinges on.	The Applicant needs to consider the issues raised in the UK Aviation Jet Zero strategy's judicial review and the CCC's concerns. Please reflect on how these concerns could impact the UK's net zero trajectory.	High
7.	Summary	In summary, 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 in alignment with the concerns raised to the UK Government by the CCC and in the judicial review. Additionally, the GHG Assessment does not assess the cumulative impact of the Project in the context of the eight of the biggest UK airports planning to increase to	The Applicant needs to address the comments raised above and update the GHG Assessment to adequately consider the risk of the UK Aviation Jet Zero strategy and the cumulative impact of the Project.	High

<sup>4</sup> <https://www.theccc.org.uk/wp-content/uploads/2022/06/Policy-implementation-timeline-Aviation.pdf>

		approximately 150 million more passengers a year by 2050 relative to 2019 levels.		
8.5.3 Environmental Statement - Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions	It is not clear if carbon calculations were carried out during the construction lifecycle stage in the ES [TR020005] for well-to-tank (WTT) emissions.	Excluding WTT is non-compliant with the GHG Protocol Corporate Accounting Standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. This also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24.	The Applicant needs to update the GHG Construction assessment to account for WTT emissions.	High
9.	The RICS distances were referenced in Table 4.1.1 of the ES [TR020005] for the average material haulage distances. However, the RICS transport distances were not applied comprehensively.	Currently, only 100km was considered for construction-related A4 emissions, which is not in alignment with the recommended RICS transport distances. Furthermore, no global shipping emissions were considered as part of the GHG assessment, which is not in alignment with the RICS global transport scenario. This therefore under accounts the construction transport emissions.	The Applicant needs to conduct a comprehensive transport assessment in alignment with the RICS transport distances <sup>5</sup>	High
10.5.3 Environmental Statement - Appendix 16.9.2 Assessment of	In Table 2.1.1 it is confirmed that the carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology [TR020005] in Section 16.4.18). This also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24	The Applicant needs to update the GHG ABAGO assessment to account for WTT emissions.	High

<sup>5</sup> <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/building-surveying-standards/whole-life-carbon-assessment-for-the-built-environment>



Greenhouse Gas Emissions for Airport Buildings and Ground Operations (ABAGO)				
11.	In Section 1.2.1, it is not clear if carbon calculations are carried out for maintenance, repair, replacement or refurbishment emissions.	Maintenance, repair, replacement or refurbishment emissions are not indicated to be scoped in the GHG ABAGO assessment. These emission sources could potentially account for a significant portion of the ABAGO emissions.	The Applicant needs to provide a justification for why these were not calculated within the GHG ABAGO Assessment.	High
12. 5.3 Environmental Statement - Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions	It is not clear how or if Applicant converted CO <sub>2</sub> emissions from aircraft to CO <sub>2</sub> e.	It is not clear if the Applicant undertook a conversion from CO <sub>2</sub> to CO <sub>2</sub> e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) <sup>6</sup> . Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO <sub>2</sub> e in 2028 in the most carbon-intensive year where 5.327 MtCO <sub>2</sub> e was estimated to be released (Table 5.2.1).	Can the Applicant please confirm if a conversion was undertaken from CO <sub>2</sub> to CO <sub>2</sub> e? If not, the Applicant is required to update the GHG Aviation Assessment to account for this.	High
14.	In Aviation methodology well-to-tank (WTT) emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24. This would result in an underestimation of the GHG emissions associated with aviation	Can the Applicant please confirm if WTT was applied to the Aviation GHG assessment? If it was not, the Applicant is required to update the GHG assessment to account for WTT emissions.	High

<sup>6</sup> <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

		since a 20.77% (BEIS, 2023 <sup>7</sup> ) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO <sub>2</sub> e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO <sub>2</sub> e was estimated to be released (Table 5.2.1).		
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<sup>7</sup> <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

## CLIMATE CHANGE

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Baseline Information review</b>				
1. Environmental Statement Chapter 15 Climate Change	Time periods considered for climate change projections are not far enough into the future to represent the worst case scenario.	The most distant time period chosen for assessment was 2040-2069 (2060s) (paragraph 15.5.2 of ES Chapter 15 Climate Change), however, some asset components are assumed to be operational in perpetuity. These climate change projections are not adequately far enough into the future to represent the worst case scenario.	The Applicant should collect additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are accounted for. Data available includes: <ul style="list-style-type: none"> <li>• PPCE (Probabilistic Projections of Climate Extremes) for future climate extremes – available between 1961 and 2100.</li> <li>• Probabilistic projections (25km) - up to 2070-2099 (2080s) is available.</li> </ul>	High
<b>Assessment of significant effects</b>				
2.	Identification of construction risks is limited.	Construction risks identified (refer Table 15.8.5 of ES Chapter 15 Climate Change) are limited and could be addressed in more detail e.g. flooding of site or construction compounds causing health and safety issues, damage to equipment and/or impacts to the construction programme and resulting cost increases.	The Applicant should undertake a more detailed identification and assessment of construction related climate risks and distinguish areas that are particularly vulnerable and may require specific adaptation measures to be in place.	Uncertain.
3.	Inconsistency and lack of detail in some climate impact statements.	The climate impact statements (Table 15.8.5 and Table 15.8.6 of ES Chapter 15 Climate Change) are lacking in consistency in that some are missing an 'impact'. They have a cause, an 'event' but no end 'impact'. This end result is what should determine the consequence rating and could have led to an underestimation of risk.	The Applicant should update all climate impacts statements to have a clear end impact so that all risks are articulated in a consistent way.	Uncertain.

<b>Mitigation, enhancement and monitoring</b>				
4.	Lack of identification of additional mitigation / adaptation measures.	Whilst the Applicant may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures should be noted and communicated with an indication of who is responsible and timing. For example, Appendix 5.3.2 lists a number of 'options for climate resilience measures' which should also be included in this report.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change.	Uncertain
<b>Mitigation, enhancement and monitoring</b>				
5. 5.3 Environmental Statement - Appendix 15.5.2 Urban Heat Island Assessment	Mitigation measures should be proposed to reduce the impact of UHI effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	Uncertain.
<b>Assessment of significant effects</b>				
6. 5.3 Environmental Statement - Appendix 15.8.1 Climate Change Resilience Assessment	Inconsistency and lack of detail in some climate impact statements.	The impact statements are lacking in consistency in that some are missing an 'impact'. They have a cause and an 'event' but no end 'impact'. This end result is what should determine the consequence rating and may be why no risks are rated higher than a medium.	The Applicant should update all climate impacts statements to have a clear end impact for consistency. The risk ratings should then be revised accordingly.	Uncertain.
7.	Identification of construction risks is limited.	Construction risks identified are limited and could be addressed in more detail e.g. flooding of site causing health and safety issues, damage to equipment and/or construction programme impacts and resulting cost increases.	The Applicant should undertake a more detailed identification and assessment of construction related climate risks.	Uncertain.

8.	Concerns regarding underestimation of risk.	Regarding Risk 7, there is a concern that the impacts could be more severe than just delays in fuelling i.e. reaching flashpoint of aviation fuel on extreme hot days could lead to combustion. Also given it has been suggested that there may be hydrogen usage for low emissions vehicles during construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.	The Applicant should review the articulation of risk, impact and risk rating and revise where appropriate. Further consideration should be given to climate risks associated with hydrogen storage and usage.	Uncertain.
9.	Lack of identification of additional mitigation / adaptation measures. (Same concern as with the main report i.e. Chapter 15 Climate Change)	Whilst the Applicant may not have assessed any risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures to increase resilience should be noted and communicated with an indication of who is responsible and timing of implementation.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change. Where these are included in the report, DCO, or Control Docs will need to show how these are to be secured, delivered & maintained	Uncertain
10.	Lack of consideration of storm events.	Storm events are not considered sufficiently in this assessment. Risk 21 could be extended to include storm events (i.e. extreme rainfall, thunder, lightning and wind), resulting in delays to aircraft take-off and landing. Furthermore, we suggest the likelihood rating is too low and the description of 'As likely as not' is more appropriate. Evidence of this risk already occurring this year can be found online: <a href="https://www.bbc.com/news/uk-england-sussex-65875840">https://www.bbc.com/news/uk-england-sussex-65875840</a>	The Applicant should further consider storm events and risk description with rating to be revised.	High
11.	Lack of consideration of wildfire	Wildfire is not mentioned as a possible climate hazard impacting the airport's operation. Wildfires in the surrounding area, in particular the smoke they generate, can impact airport operations, e.g. flights can be delayed, or certain planes may have to be diverted. Refer to following incident: <a href="https://www.express.co.uk/news/uk/1653913/Gatwick-">https://www.express.co.uk/news/uk/1653913/Gatwick-</a>	The Applicant should consider the risks associated with wildfire & associated smoke.	High

		<a href="#">airport-fire-smoke-runway-flights-wildfire-heatwave-drought</a>		
12.	Lack of consideration of fog	Risks associated with fog were not included in the risk assessment. Fog can impact visibility and the ability to perform day to day airport operations. Adequate consideration should be given to this in the risk assessment.	The Applicant should undertake further research to gain clarity around how fog may change in the future as a result of climate change and give further consideration to its risks.	High
13.	Insufficient detail on the climate change impact on critical airport equipment and infrastructure.	Consideration to be given to how climate change could impact critical equipment and infrastructure e.g. power, telecommunications as well as the embedded and additional mitigations to reduce this risk. For example, flooding or storm events impact critical power equipment causing a power outage. What redundancy is in place for this?	The Applicant should include risk and mitigation details regarding the climate change impact on critical airport equipment and infrastructure.	High
<b>Assessment of significant effects</b>				
14. 5.1 ES Chapter 20 Cumulative Effects and Inter-Relationships	Disagree with the assessment that 'cumulative effects are not relevant'.	We understand that a conclusion may be drawn that cumulative impacts from nearby projects maybe be 'insignificant', but we disagree with the statement that 'An assessment of cumulative effects is not relevant'. For example, nearby projects could exacerbate the urban heat island impact of the project or increase the impact of flooding to the site or access to the site.	The assessment should be reconsidered and reworded to reflect that it is not irrelevant.	High

## LOCAL ECONOMIC AND SOCIO-ECONOMIC IMPACTS

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Environmental Statement Chapter 17: Socio-Economics</b>				
1.	Incomplete consideration of local planning policies.	The review of policies is considered incomplete (only three adopted policies identified for <b>Crawley and</b> limited analysis of how the Project aligns with these. No analysis of some of the potential constraints brought about by the Project on Crawley	The Applicant should include a full list of adopted and emerging policies and provide a more detailed analysis of how the project aligns with local policy and strategy. Consideration of some of the potential constraints brought about by the project on Crawley should also be included.	High
<b>Assessment Methodology</b>				
2.	Confirmation on projects which informed methodological approach	Paragraph 17.4.2 states that the methodology has been based on accepted industry practice, a review of socio-economic assessments for other relevant projects including other airport or significant infrastructure schemes, and feedback received by PINS and local authorities during the consultation process.	The Applicant should clarify which relevant projects were drawn upon, setting out why they are relevant, to inform the development of the methodology for this assessment.	High
3.	No consideration of effects at a Crawley borough level.	Despite being raised as a gap in the assessment at several Socio-economic Topic Working Group meetings, there is still no assessment of effects undertaken at a local authority level. The impacts of the project on key variables such as employment, labour market, housing (including affordable), social infrastructure and temporary accommodation need to be assessed given they affect both functioning and decision making at the local level.	The Applicant should undertake an assessment of project impacts on each local authority located within the Northern West Sussex Functional Economic Market Area (FEMA) to adequately understand the extent of impacts at a local level.	Low
4.	Assessment of impacts on property prices	An assessment of project impact on property values has been scoped out of the assessment despite PINS advice on the issue (PINS ID 4.10.3). Unless subsequently agreed otherwise by PINS, an assessment of project impacts on property prices is still required.	At the minimum, the Applicant should undertake a qualitative assessment which robustly assesses the project's impacts on property prices.	Low
5.	Clarification on use of pre-Covid data	Paragraph 17.4.14 states that 2019 data was primarily used given concerns with the Covid pandemic	The Applicant should source up-to-date data to inform the socio-	High

		potentially affecting baseline data. However, this is a confusing message given some of the data sources used are post Covid and it is not clear why the Applicant has applied this approach.	economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	
6.	Magnitude of impacts definition	Paragraph 17.4.25 presents tables defining the scale of magnitude of impacts for construction and operational periods of the project. The use of numbers and percentages to quantify impact can be challenging especially given all study areas are different and can be influenced by a number of different factors. It is not clear how these the ranges were defined to inform the assessment.	The Applicant should review these numbers to determine their appropriateness given the study areas for the project. The Applicant should also provide the rationale for the job ranges provided.	Low
7.	Use of up-to-date information sources	Paragraph 17.5.1 states that data from the 2021 Census is currently being released and this has been used where available at the relevant spatial scale. On this basis, the baseline assessment presented in section 17.6 comprises the most up-to-date position at the time of writing.	The Applicant should source up-to-date data to inform the socio-economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	High
8.	Consideration of worst-case scenario for employment benefit	Paragraph 17.5.5 states that the construction assessment presented in Section 17.9 focuses on the project's potential maximum effects. Whilst it is important to consider the maximum scale of impacts in terms of potential implications on local areas, it is also important to present a worst-case scenario in terms of employment benefit.	The Applicant should clarify whether they have estimated a worst-case scenario for numbers of construction workers.	Low
9.	Workplace earnings trends and impact on affordability	Workplace earnings are shown to be growing at a higher rate than resident earnings and it is implied this may lead to less out-commuting. This trend could impact the affordability ratio, which would have implications elsewhere in the socio-economic evidence, for example, assumptions on future housing growth and demand for affordable housing.	The assumption needs to be evidenced. This should include a trend analysis as well as consideration of likely variances at a local authority level.	Low
10.	Approach to population growth projections	Population projections show a population increase of nearly 15,000 (or nearly 6,000 homes assuming an occupancy ratio of 2.5). This does not provide a realistic assessment of the population growth likely to occur in this area. There is no sense check of deliverability of these projections against development constraints in Crawley and constraints in other areas such as the flightpath and green belt designation.	The Applicant should undertake an assessment of the likelihood of this level of growth within the LSA, taking into consideration the constraints on local housing development.	Low
11.	Assessment of sensitivity of receptors	Paragraph 17.6.121 presents a table setting out sensitivity of receptors. We question the sensitivity grading for employment and supply chain impacts,	The Applicant should revisit the sensitivity gradings for identified receptors.	low



		labour market impacts, disruption of existing resident activities, housing supply in the HMAs relevant to LSA and FEMA, community facilities and services. The sensitivity gradings should be revisited for these receptors.		
<b>Assessment of significant effects</b>				
12.	Assessment of construction effects	Assessment of labour market effects, effects on temporary accommodation, effects on community facilities, and effects on employment during construction need to be revisited. Concerns have been raised about the sensitivity of these effects. The magnitude of effects on construction employment for all study areas is also questioned, and magnitude of labour market effects based on magnitude criteria being used. There are also potential data limitations in relation to construction employment calculations as outlined in the review of Appendix 17.9.1. The Applicant hasn't undertaken any assessment at local authority level which is considered essential given existing constraints on labour supply in Crawley.	The Applicant should revisit this assessment based on the comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Low
13.	Assessment of construction effects during the first year of operation	Assessment of construction effects during the first year of operation (including labour market effects, effects on population, effects on temporary accommodation, construction noise impacts on residents, effects on community facilities, and effects on construction employment) need to be revisited. The magnitude score of high for all study areas is questioned. The number of construction jobs would appear unlikely to have a significant beneficial effect in the FEMA and LMA. It should also be noted that the construction jobs calculation appears to be based on a "maximum" scenario. The Applicant hasn't undertaken any assessment at local authority level.	The Applicant should revisit this assessment based on the comments. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Low
14.	Operational effects	Assessment of operational labour market effects, effects on housing, population and community facilities and services need to be revisited. We have outlined our concerns above in relation to the magnitude criteria being used for this assessment and the sensitivity grading of this receptor for the LMA and FEMA. The Applicant also hasn't undertaken any assessment at local authority level.	The Applicant should revisit this assessment based on the comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Low
15.	AAP-030 Environmental Statement Chapter 5 Project	Whilst Gatwick Airport represents a sustainable location for hotels, hotels are not defined as an operational use.	The applicant should provide justification detailing why proposals	Uncertain

	Description states that four hotels are proposed as part of the DCO.	This raises the question as to whether the proposed hotels can be considered as part of the DCO.	for new hotels are considered to fall within the scope of the DCO.	
16.	Application of assessment issues across all scenarios	With regards to the sections on other scenarios: (1) Interim Assessment Year: 2032 (Paragraphs 17.9.80-17.9.119) (2) Design Year: 2038 (Paragraphs 17.9.120-17.9.142) (3) Long Term Forecast: 2047 (Paragraphs 17.9.143-17.9.165) The construction (where applicable) and operational phase assessments have been undertaken in line with the assessment discussed to date. Therefore, all previous comments made on the assessment are relevant here.	The Applicant should revisit the assessments for these scenarios taking account of the previous comments made.	Low
17.	Cumulative effects	The conclusion that in the absence of information, it is not possible to provide a cumulative assessment for all construction effects, is simplistic and given the significant concerns raised with the main assessment, a comprehensive cumulative assessment should be undertaken to establish if there are potential issues within the study areas. Furthermore, paragraph 17.11.9 states that the construction period of the project will overlap 'to some degree' with Tier 1 schemes. The statement 'to some degree' is understating the potential labour supply issues. It is clear there will be commonality of skills and trades demanded by the project and other construction projects. The operational cumulative effects (first full year) section is based on projections of future population, labour supply, jobs and housing and is unlikely to have a material effect on the conclusions from the initial assessment. A number of queries related to population, labour supply, jobs and housing have been raised which would have an impact on this assessment.	The Applicant should revisit and undertake a comprehensive cumulative assessment. The Applicant should undertake an assessment at local authority level for those authorities based in the FEMA.	Low
<b>Document name:</b> Environmental Statement Appendix 17.9.3: Assessment of Population and Housing Effects				
18.	Use of outdated data sources	Census 2011 has been used for dwelling vacancy and economic activity. Further, in the description of employment-led scenarios, paragraph 3.1.9 notes that modelling assumes that commuting, unemployment and economic activity are fixed over the forecast period	Where old data has been used to underpin the assessment, the Applicant should revisit and update with the most recent information	High

		based on inputted assumptions, a number of which are significantly out of date including vacancy and economic activity rates from the 2011 Census.	from the 2021 Census which is available.	
19.	The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local housing needs or requirements at a housing market area or local level (such as market signals, affordable housing or constraints on housing supply).	There needs to be a more granular assessment of housing delivery in the area, in particular of future supply, as well as the unmet affordable housing need to inform the assessment. The Applicant fails to consider the complex reasons affecting housing supply in	The Applicant should revisit the assessment and undertake a more granular assessment of housing delivery (including affordable housing) to take account of existing constraints. Further justification should be provided and reviewed against past performance to substantiate the conclusions.	Low
20.	Water neutrality implications on housing delivery	It is not correct for the Applicant to surmise at 4.3.11 that the Local Authorities (as of August 2021) would have been able to take account of water neutrality implications on housing delivery through their trajectories. Issue of the Natural England Position Statement in September 2021 instantly applied water neutrality requirements to planning applications, effectively stopping development as planning applications could not be consented without having demonstrated water neutrality. As such, the housing delivery implications of water neutrality were not fully understood as of August 2021. Furthermore, the Applicant has not used the latest housing delivery reports which would take account of these issues.	This is an important clarification that should be made, as the Applicant's current wording infers that water neutrality implications were factored into August 2021 housing trajectories, when in reality the 'stop' on development came after issue of the Position Statement in September 2021. Furthermore, in the instance highlighted above, the Applicant should use the latest information available to inform the analysis.	Low
21.	Assessment of impacts on labour supply	Paragraph 5.2.14 states that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area (Croydon and East Surrey) where the project tips surplus into supply in a single year. The basis for this conclusion does not appear robust, as based on the analysis the project is shown to exacerbate labour shortfall issues across multiple areas. Furthermore, if underlying inputs in the model are changed to reflect the fact that the labour market is already more constrained as has been modelled, it is likely shortfalls would be greater across many of the areas.	Given the limitations in its approach, the Applicant justify the basis of the assessment which concludes that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area. The applicant should revisit the assessment which should be undertaken at a local authority level.	Low
22.	Vacant properties	In paragraph 6.2.3-6.2.4 the Applicant provides an analysis of vacant properties, which implies that bringing these back into use will help meet the demand generated by non-home based workers. There is no	A more robust assessment of private rented market is required. The Applicant needs to consider how it can help to bring these	Low

		analysis of why these properties are vacant, length of time vacant and barriers bringing them back into use.	properties back into use, both in the short term by the non-home based workers but also by bringing a benefit to local areas and bringing properties back into use by local population once construction is complete.	
23.	Impacts on affordable housing	<p>Paragraph 7.5.1 recognises that the project is likely to generate demand for affordable rented housing which is greater than the number of homes in the existing stock. If this exercise is done at a local authority level, then the figures are very different and the true impacts at local authority level are being hidden.</p> <p>Secondly, assessment goes on to conclude that despite the demand from the project being skewed towards affordable housing, there are unlikely to be impacts on affordable housing beyond what is emerging or planned for. However, analysis of completions by local authority (Table 7.4.1) has demonstrated that the delivery frequently does not meet the need, and therefore a shortfall is likely. On that basis, the conclusion that the project is unlikely to have any impact on affordable housing demand beyond what is planned for does not appear well founded.</p>	<p>The Applicant should substantiate the conclusion that the project is unlikely to have any impact on affordable housing demand.</p> <p>The analysis should be updated at a local authority level in order to help identify issues which need to be planned for and mitigated.</p>	Low
<b>Document name:</b> Environmental Statement Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note				
24.	Distance travelled to work data	Paragraph 2.1.6 explains that the study draws on data provided by the Construction Industry Training Board (CITB) in terms of average distance workers travel to sites for each region of the UK. The application of a regional estimate to capture numbers of home-based workers can be problematic given the considerable differences that exist within local geographies.	The Applicant should review their approach to this assessment and apply relevant assumptions to the modelling to take account of local variations.	Low
25.	Use of out of date data sources	Where Census 2011 data is being relied upon for analysis, there needs to be an assumption/limitation added to the analysis given the source is significantly out of date which could affect the accuracy of the GGM. This has the potential to affect the accuracy of the GGM in terms of estimating numbers of home-based (HB) workers and non-home based (NHB) workers.	The Applicant should review their approach to this assessment and apply relevant assumptions to the modelling to take account of the up-to-date situation.	High
26.	Labour supply constraints	The Gravity Model used to identify the split of construction workers as 80% HB and 20% as NHB	The Applicant should revisit their approach and include a worst-case	Low

		does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA. Given these constraints, an assumption of 80% HB construction workers doesn't appear to be very realistic in practice or indeed a worst-case approach.	scenario which assumes all construction workers will be NHB.	
27.	Private rented sector (PRS) accommodation	Section 6.3 provides details of allocation of NHB workers by local authority vs supply of private rental sector beds. Table 6-5 presents PRS bed supply for 2021 by local authority but it isn't clear how these figures have been derived given Paragraph 3.5.2 advised the data on bedrooms was gathered from the 2011 Census. In addition, whilst the figures present PRS bed supply, they do not advise on the availability of accommodation. In the light of a declining supply of rental accommodation and feedback from local authorities on limited availability this would seem to be a significant omission.	The Applicant should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include the English Housing Survey and liaison with local authorities in the FEMA. The analysis should also take account of other schemes that could need construction workers who may require temporary accommodation.	Low
<b>Document name:</b> Appendix 17.8.1 Employment, Skills and Business Strategy				
28.	Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to Implementation Plan is not identified.	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why the Applicant is unable to provide further details on these arrangements within the ESBS which is the control document in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a Business as Usual (BAU) scenario. Furthermore, the ESBS does not set out any process for how the Implementation Plan would be developed. Given the Applicant is currently suggesting that the majority of the relevant content for the local authorities will be set out in the Implementation Plan, it is essential that the Applicant provides further details on the process for delivering this.	The Applicant as part of ESBS should provide more detail on potential tailored initiatives that would specifically align with and support local communities. This should include relevant baseline information to demonstrate local need, which should appropriately consider the variations between local authorities. The Applicant should provide some details on performance, financial management, monitoring and reporting which can be developed further as part of an Implementation Plan. The Applicant should also clearly explain the difference of BAU and DCO scenarios in terms of provision & outputs. A route map should be provided which explains the process from ESBS to Implementation Plan, aligned to areas of identified local need and outcomes.	Uncertain
<b>Document name:</b> Environmental Statement Appendix 17.6.1: Socio-Economic Data Tables				

29.	Out of date data sources	Several Baseline Data Tables are out of date and don't use the most recent data sources available at the time. This includes education data on shortfall/surplus which needs to be tested with relevant local education authorities.	The Applicant should be using the most up-to-date sources.	High
<b>Document name:</b> Appendix 17.9.2 Local Economic Impact Assessment				
30.	Additionality assumptions	It is unclear to what extent additionality assumptions have been accounted for in the estimates of GVA and employment effects including direct, indirect, induced and catalytic effects. Paragraph 6.3.5 states that estimating net direct, indirect and induced impacts requires assumptions on displacement that are difficult to determine robustly. Whilst it is acknowledged that estimating levels of displacement can be tricky, assumptions can still be applied through the application of a precautionary approach and use of benchmarks.	The Applicant to clarify its approach to additionality. The Applicant should apply displacement (and other additionality assumptions) to the various calculations to align with Green Book guidance.	Low
31.	Basis for distribution assessment of direct impacts	Paraph 5.3.9 states that the impact estimates on the basis of residency distribution of direct impacts are presented. GAL has provided pass holder address information to inform this. It is not clear when this information was obtained therefore the local authorities cannot be certain the information used is up to date.	The Applicant to confirm the date of pass holder information used.	Low

## HEALTH AND WELLBEING

Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
11.	Loss of public open space	It is stated that as a mitigation measure, new areas will be created to serve all users but will not be immediately contiguous with area lost. This does not provide enough reassurance that mitigation measures will be targeted at communities or groups impacted by the loss.	The Applicant should further demonstrate that this will be easily and equally accessible to current users and communities. Evidence of the consultation and the feedback from this community that use the area.	High
12.	Lack of an Equality Impact Assessment	Though Equality is stated as a baseline there is no Equality Impact Assessment of the effects of the Project. This would aid in the understanding of how the project may impact on different groups and ensure that certain individuals are not put at a disadvantage or discriminated against as a result of the project activities. This would also ensure that mitigation measures can be tailored to avoid harm to equality.	It would be beneficial for the Applicant to undertake an Equality Impact Assessment.	Uncertain
13.	Lack of evidence of how local services will be affected	WSCC is concerned that the impact of the Project on local health services is currently not considered. This is particularly important, as from practical experience in West Sussex, a higher throughput at Gatwick Airport has often led to an increased demand for health services.	Evidencing the predicted increase in footfall due to the Project and how this may impact on acute care.	Uncertain
14.	Lack of evidence of engagement and results from that engagement with the communities/ receptors.	Results should be presented with a detailed description of the statistical methods used, including all variables accounted for and those not included in the analysis models. This would enable a better interpretation of the results, which seem not to be in line with what should be expected. A detailed definition of the populations in the study area and a clear description of evidence supporting each assumption made have not been demonstrated.	WSCC would expect to see data on engagement with the affected communities demonstrating their concerns and implications to them.	Uncertain
15.	Lack of evidence of improvements to social mobility	There is no indication that consideration has been given to the impact on small and medium sized businesses, or where this is cross referenced from other chapters. It is advised that this is included,	This information to be evidenced in the Employment, Skills and Business Strategy	Uncertain

		considering the influence it could have on health and well-being. It is vital to consider the nature and quality of work and how this benefits residents and future generations when discussing the economic benefits of the Project.		
16.	Lack of evidence to support professional views and assumptions made in the documentation	<p>Evidence used to substantiate assumptions should incorporate feedback from communities likely to be impacted by the Project.</p> <p>For example - it is claimed that expected increases in walking journey times are not considered to be 'onerous' and would contribute to physical activity levels, it is also possible for longer journey times to discourage people from active travel - having a negative and perhaps rebound impact on active travel. There is insufficient information to allow an understanding of the conclusions made around this or if the diversions have disproportionate impacts on certain groups.</p>	The Applicant should provide further evidence that the Project will not have a disproportionate impact upon vulnerable groups. Evidence such as community feedback on implications to their journey times.	Uncertain



## CUMMULATIVE ASSESSMENT AND IMPACTS

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	Lack of support for the Crawley Western Multi-Modal Transport Link	The Transport Assessment, shows cumulative adverse impacts on local roads, particularly within the western neighbourhoods of Crawley. GAL's support for the Crawley Western Multi-modal Transport Link is necessary to alleviate this future impact.	Provide support, in policy terms and potentially financially, the Crawley Western Multi-Modal Transport Link to enable developers to alleviate this impact should development West of Ifield come forward.	Uncertain
2.	Safeguarding for a future southern runway should be removed if the NRP is approved	Safeguarding for a potential future southern runway significantly impedes the ability of Crawley to meet its development needs for housing, employment and noise sensitive supporting infrastructure such as schools. GAL is not actively pursuing this option and, given growth through the Project continues to 2047, it would be unlikely a southern runway would be needed until around 2050.	Confirm that GAL will not pursue the requirement for safeguarding	Uncertain

## DRAFT DCO / OTHER MISCELLANEOUS CONCERNS

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	The Council has wide-ranging concerns about the dDCO.	<p>These will be shared with the Applicant in due course and set out in the Council’s LIR.</p> <p>A summary of the Council’s main concerns (which is not exhaustive) is set out below –</p> <ul style="list-style-type: none"> <li>i. 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).</li> <li>ii. clarification of other definitions relating to various airport and boundary plans listed in the order and extent of operational land.</li> <li>iii. the drafting of article 3 (development consent etc. granted by Order).</li> <li>iv. the drafting of article 6 (limit of works) which appears to allow GAL to exceed parameters beyond those assessed in the Environment Statement.</li> <li>v. the drafting of article 9 (planning permission) and provisions in relation to existing planning conditions and future planning controls (including permitted development rights).</li> <li>vi. the drafting of article 25, which concerns trees and hedgerows.</li> <li>vii. the drafting of Part 6 (Miscellaneous and General) particularly the impact of article 46 (disapplication of legislative provisions) on</li> </ul>	Amended wording to ensure the dDCO is worded appropriately to ensure they are meaningful and enforceable.	Uncertain.

		<p>drainage and article 48, which provides a defence to statutory nuisance.</p> <p>viii. the inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development).</p> <p>ix. 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 in R.19 (airport operations);</p> <p>x. concerns regarding Schedule 11, including the proposed timeframe for granting approval for the works, particularly those which are complex and for which limited information has been provided. The lack of any fee proposal for the processing approvals etc. is a matter of genuine concern.</p> <p>xi. the limited information contained in the documents listed in Schedule 12 (documents to be certified).</p>		
2.	Resources, timings and costs involved with discharge of requirements and monitoring and enforcement of ongoing mitigation measures	There has been no discussion with applicant to date on this matter. Schedule 11 in the DCO is not populated	The scale and complexity of the project will require significant LPA resource. CBC welcomes dialogue with the applicant to progress this matter.	Uncertain
3.	Exclusion of Local Plan Policies and lack of consideration of their requirements.	Lack of reference or acknowledgement of the adopted policies and relevant supplementary guidance that should be considered as part of the DCO.	Amendments to ensure all policies and documents referenced in the main ES are listed in Appendices and demonstration that the DCO	Uncertain

			works comply with these requirements (or explain why not).	
4.	Lack of clarity on how Port Health functions will be scaled in line with passenger growth	Currently Port Health has insufficient space. Not clear where new space will be provided.	Identify new space provision, in consultation with Port Health team	High
5.	CAA No Impediments	When GAL expects the Civil Aviation Authority to confirm there are no obvious safety related impediments	Applicant to provide CAA letter of No Impediment	High
6.	Northern Runway operation controls	How the runway operation changes mentioned in paragraphs 1.3.7 and 1.3.8 will be secured and appropriately controlled	dDCO requirement to be added and agreed	high
7. Planning Statement	Airports National Policy relevance to the DCO determination	Whether there is any legal precedent for the statement that it is "appropriate to use the policy framework of the [Airports National Policy Statement (ANPS) as the primary framework against which the project as whole should be tested" (para 1.5.19)	Legal Confirmation	Uncertain
8. Planning Statement (Appendix A)	Planning History	Incomplete, inaccurate and misleading. No details on the current controls and conditions imposed by existing planning permissions and no evidence to justify the baseline position being relied upon	Reviewed Planning History agreed with the LPA	Uncertain.
9.	Site Waste Management Plans	Why the dDCO does not make provision about securing that Site Waste Management Plans following the template in the Construction Resources and Waste Management Plan	dDCO provision	Uncertain
10. Planning Statement Section 8.16	Geology and Site Conditions	Refers to "existing legislative regimes" for spillages and storage facilities. Aside from the Control of Pollution (Oil Storage) (England) Regulations, are any other regimes relevant	Applicant review	Uncertain