



Mole Valley District Council

**Principal Areas of Disagreement Summary Statement  
(PADSS)**

21 October 2023

Mole Valley District Council (MVDC, ‘the Council’) has regularly engaged with Gatwick Airport Limited (GAL, ‘the Applicant’) throughout the pre-application stage for the Northern Runway Project (NRP) Development Consent Order (DCO). This includes participation in engagement activities such as topic working groups (TWGs) and the submission of responses to formal public consultations. MVDC will also be working with GAL on the preparation of a Statement of Common Ground (SoCG), however, this work has not yet taken place and at the time of writing is not intended to progress until late November 2023. As such, this Principal Area of Disagreement Summary Statement (PADSS) provides a summary position of those areas it considers to be unresolved and/or in dispute at this time. The Council anticipates detailing these further within relevant examination stages, including the Local Impact Report (LIR). The PADSS is provided for the benefit of the Examining Authority (ExA) to provide an early identification of the principle disagreeable matters and provide a clear focus for the examination and subsequent questions to be posed.

This list of issues represents the Council’s position at this time and it is envisaged that these will be both resolved and added to as the examination progresses (see MV01).

**Reference Table 1: Interpretation of column ‘Likelihood of concern being addressed during Examination’**

<b>Grading</b>	<b>Why?</b>
<b>Likely</b>	Where agreement should be possible, or a relatively simple change is required
<b>Uncertain</b>	Where an issue is being, or will be, discussed and could be resolved subject to necessary scrutiny and agreement.
<b>Unlikely</b>	Where agreement on an issue is unlikely, or it is difficult to see what a solution could be.

Principal Areas of Disagreement Summary Statement (PADSS) from: <i>Mole Valley District Council (MVDC)</i>			Version Number: Version 1 Submitted at: 27 October 2023	
Issue	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>General</b>				
<b>MV01</b>	<b>Quality of documentation and impact on PADSS</b>  <b>Document Ref(s): General</b>	The Applicant has consistently demonstrated an unwillingness to fully address the issues raised and the submitted documents are difficult to interpret in many cases including for the topics of noise, climate, transport and base case.  There is a consistent lack of transparency with regard to key issues and this will necessitate a more fluid/iterative approach to how the Council will highlight principal areas of disagreement and engages in the examination process. For example, something which is not currently on the PADSS may need to be added as discussions evolve. Equally, an issue may come off the list where clear explanation and discussion resolves matters.	MVDC fundamentally disagrees with the Applicant in numerous areas and it may be necessary to escalate clarifications or other areas of concern into the Council's PADSS as the process develops.	Uncertain
<b>Air Quality</b>				
<b>MV02</b>	<b>Lack of costing breakdown for AQ impacts and mitigation</b>  <b>Document Ref(s): APP-038, APP-156, APP-042</b>	The Applicant has provided insufficient information to detail how the health impacts from increased levels of air pollution have been calculated across the population as a whole or how costs will be shared, through mitigation mechanisms, with the wider community once they have been determined.	Full and robust costs of impacts and mitigation needs to be carried out and published. These are not in Chapter 17 and therefore missing.	Uncertain

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		Understanding costs is essential to effective and necessary mitigation and is claimed to have been considered under the Socio-Economic Effects of Chapter 17. However, there is no mention of such costs in Chapter 17 and these costings are not clearly and robustly set out.		
<b>MV03</b>	<b>Significance of construction and transport management plans</b>  <b>Document Ref(s):</b> <b>General</b>	It is not currently clear how the impacts of both construction and transport will be offset/mitigated. To date, the information provided around how and when mitigation will be implemented is both high level and non-committal. It will be through the construction and management plans that authorities and communities can obtain assurance that the AQ impacts will be properly dealt with. To date, there has been no draft management plans which provide the necessary level of detail.	Construction and transport management plans must be prepared collaboratively with local and highways authorities and commenced swiftly so that the information is available for consideration during the examination. Should the DCO be approved in the absence of outline management plans, necessary scrutiny will not take place and implementation could fall short of what is necessary and appropriate.	Likely
<b>MV04</b>	<b>Clarification around air quality complaints procedure is needed</b>  <b>Document Ref(s):</b> <b>APP-082</b>	Paragraph 4.12.7 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice) identifies that a complaints procedure will be established but does not reference the sharing of complaints and resolution with local authorities. This measure is also identified within the site management	The Applicant should provide the necessary information and the text should be amended to state that complaints information is provided to local authorities when	Uncertain

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		air quality section as something that will be made available to local authorities.	complaints are received. The approach to complaints reporting and monitoring can be agreed in the Dust Management Plan.	
<b>MV05</b>	<b>Need for the Dust Management Plan (DMP) to be considered through the examination</b>  <b>Document Ref(s): APP-082</b>	The monitoring portion of Section 5.8 (Environmental Statement: Appendix 5.3.2: Code of Construction Practice) suggests that further detailed plans are needed to design a DMP. This is not considered to be correct and a draft DMP can be developed with the information available at this time, with updates implemented as needed.	The DMP has not been prepared and should be developed during the examination and the Code of Construction Practice updated accordingly and linked with the DMP.	Uncertain
<b>MV06</b>	<b>Operational monitoring mechanisms need to be clear</b>  <b>Document Ref(s): APP-082, APP-090</b>	<p>Operational monitoring will be very important to understand if changes in air quality are occurring or unacceptably worsening. There is no information in either the Air Quality chapter (Environmental Statement 5.1: Chapter 13) or the Surface Access Commitments document (Environmental Statement 5.3: Appendix 5.4.1) of how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored.</p> <p>Concerns remain that, as presented, key monitoring mechanisms and related management plans (i.e. Dust Management Plan) are deferred for agreement outside of the application stage (e.g. S106) and would not be scrutinised or properly considered as part of</p>	<p>Further liaison to agree the details of the S106 operational monitoring is suggested and on how this will be used to test the effectiveness of the Surface Access Commitments.</p> <p>Operation monitoring should form part of the examination discussions.</p>	Likely

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		<p>the application.</p> <p>For example, operational phase monitoring is discussed in paragraphs 13.9.7 to 13.9.19 of the Environmental Statement. (Appendix 5.3.2: Code of Construction Practice). It is proposed by the Applicant that a S106 agreement is utilised to address the matter, rather than it forming part of the application which is being assessed. The Council suggests that this is done during the examination to ensure that monitoring is scrutinised and agreed in a timely fashion. Further details of the monitoring, locations, numbers of sites, techniques, funding and how air quality monitoring data will be evaluated against the predictions of the ES and the Surface Access Commitments is not provided by the Applicant.</p>		
<b>MV07</b>	<p><b>Ultra-fine particles need to be assessed and mitigated</b></p> <p><b>Document Ref(s): APP-038</b></p>	<p>The Applicant has had insufficient regard to the possible health impacts or levels of ultra-fine particles that could exist, specifically from aviation sources, but from other sources as well (i.e. transport). Ultra fine particles are a known issue with airports (DEFRA/Air Quality Expert Group) and when so many people live in proximity to the airport it seems an obvious thing to have assessed and considered fully. As written (13.2.5, Environmental Statement: Chapter 13 - Air Quality) the significance is underplayed and considered in a token manner in other sections.</p>	<p>MVDC requests that a proper assessment of ultra-fine particles is carried out to understand the possible health impacts and mitigated as necessary.</p>	<p>Uncertain</p>

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<b>Climate Change and Greenhouse Gas Emissions</b>				
<b>MV08</b>	<p><b>Over reliance on possible future technologies and lack of regard for cumulative impacts from other airspace/port changes</b></p> <p><b>Document Ref(s): APP-041, APP-045, APP-194</b></p>	<p>The Council does not consider the scenario testing for emissions robust or realistic as there is:</p> <ol style="list-style-type: none"> <li>1) A clear reliance on new technologies and supposed improvements in aviation when modelling emissions. Yet, there are no guarantees that these technologies will materialise or that the airlines with the ability to use them will operate out of Gatwick.</li> <li>2) Insufficient regard to the possible impacts of wider London airport expansion plans and airspace change programmes.</li> </ol> <p>Both elements will cumulatively impact emissions and the approach taken by GAL is too singular and presents the best case scenario and not what will actually happen in reality.</p>	<p>Scenarios which consider new technologies, the status quo and a hybrid of old and new, along with other potential issues and risks need to be tested. Such an approach will give a 'full-spread' of possible emissions and impacts rather than a 'hope for the best' approach.</p> <p>Updated cumulative assessments are needed to factor in the necessary scenarios.</p>	Uncertain
<b>MV09</b>	<p><b>A more innovative and committed strategy to reducing emissions is needed</b></p> <p><b>Document Ref(s): APP-091</b></p>	<p>Appendix 5.4.2: Carbon Action Plan does not show sufficient commitment or provide an innovative solution to carbon emissions. Carbon offsetting should be a 'last resort' approach to managing emissions. The Council does not consider that the Applicant has gone far enough in seeking to reduce emissions. Coupled with a reliance on new, but uncertain technologies, it is likely that a greater reliance on less beneficial offsetting would be required.</p>	<p>A more innovative approach and assessment of how to deal with emissions must be carried out.</p>	Uncertain

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<b>Future Airspace Change</b>				
<b>MV10</b>	<p><b>Lack of consideration of FASI-S project and cumulative impacts</b></p> <p><b>Document Ref(s): APP-031, APP-245</b></p>	<p>Gatwick and Heathrow are undergoing an assessment of their airspace (FASI-S). Heathrow is slightly more advanced and has submitted its Stage 2 Initial Options Appraisal, with implementation between 2027-2029. GAL is also due to consult on options in early 2024 with implementation due to commence in 2027.</p> <p>GAL has suggested that it will be several years before the details of options are for the FASI-S airspace change are known. This is used as reasoning for not building in the options for sensitivity and scenario testing. This is not accurate. GAL has also sought to suggest that the DCO can progress without understanding the FASI options further and that it will be through the FASI process that environmental impacts can be addressed.</p> <p>This is a dismissive approach and should be considered, where possible, through the DCO.</p> <p>The Council is concerned that the Applicant is deferring any consideration of potential environmental impacts to the Civil Aviation Authority (CAA) and the FASI process and has not included airspace change within the DCO assessment process. Consequently, in-combination effects are of concern to the Council.</p>	<p>Sensitivity modelling should be carried out. It is understood that the modelling would not be exact to what is eventually implemented but would have regard to potential changes rather than simply ignoring it.</p> <p>If FASI is not to be sufficiently accommodated within the DCO proposals, any noise insulation scheme must be flexible enough to mitigate different impacts post FASI-S implementation.</p>	Uncertain



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<b>Noise</b>				
<b>MV11</b>	<p><b>2032 assessment year is assessed as a worst-case scenario, but there should be a yearly breakdown</b></p> <p><b>Document Ref(s): APP-172, APP-180</b></p>	<p>The assessment of air noise utilises 2032 which is identified as the worst-case in noise terms when compared to the base case of 2019 (Environmental Statement Appendix 14.9.2). However, identification of significant effects for all assessment years should be provided. The absence of this does not present a transparent account and is misleading. Identification of all years also enables a proper consideration of the level of mitigation that should be carried out and enable consistent monitoring.</p>	<p>The Applicant must identify significant effects during all assessment years to understand how communities would be affected by noise throughout the project lifespan. This is particularly relevant to changes in the number of events generating a maximum noise level greater than 60db (N'Above) at night, or additional awakenings (being woken in the night by noise) across the population.</p>	Unlikely
<b>MV12</b>	<p><b>Overheating</b></p> <p><b>Document Ref(s): APP-180</b></p>	<p>There is no adequate assessment of overheating and the necessary performance of ventilation to ensure a comfortable internal environment. Local authorities have requested an 'Overheating Assessment' to demonstrate adequacy of the ventilation scheme. This has not been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications.</p>	<p>A suitable overheating assessment and sensitivity check against the necessary ventilation requirement's required to keep windows close. The chartered institute of Building Services engineers (CIBSE) offers guidance on overheating assessments and the minimum standard that should be used is DSY2 which uses summer data to 2050 and</p>	Uncertain

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			is more future proof than DSY1 (2011 to 20240) ( <a href="https://www.cibse.org/policy-insight/position-statements-and-briefings/overheating-position-statement">https://www.cibse.org/policy-insight/position-statements-and-briefings/overheating-position-statement</a> )	
<b>MV13</b>	<b>Eligibility for air Noise Insulation Scheme (NIS)</b>  <b>Document Ref(s): APP-180</b>	The scheme assesses noise impacts based on average summer LAeq contour levels and the Council considers that this does not meet policy requirements and does not sufficiently protect against health impacts.	Single mode contours, for summer operation, should be used to determine eligibility for noise insulation. The Council understands that there is precedent for this and has recently been required as part of the Luton Airport Expansion Project DCO application (TR020001).	Uncertain
<b>MV14</b>	<b>Measurement of ground noise to identify eligibility needs to be clear and robust</b>  <b>Document Ref(s): APP-180</b>	Paragraph 1.1.3 (Environmental Statement: Appendix 14.9.10 – Noise Insulation Scheme) suggests that eligibility for the NIS will be on the basis of “...air noise levels predicted with the operation of the Northern Runway...”. However, paragraph 4.1.11 suggests that “...Eligibility for the Inner Zone scheme noise insulation package due to ground noise will be established on the basis of measurements of levels of ground noise carried out after the Project is operating.”	Eligibility should be established in all cases on the basis of prediction not noise monitoring after the fact.  APP-180 and relevant implementation document should be amended accordingly to secure the best mitigation against negative health impacts.	Uncertain

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		This seems somewhat contradictory and all eligibility should be on the grounds of prediction to increase certainty.		
<b>MV15</b>	<b>Commencement of Eligibility</b>  <b>Document Ref(s): Condition 18 of APP-006, APP-180</b>	It is unclear when noise insulation will be provided to residents impacted by ground and construction noise. There is insufficient and imprecise details preventing the Council from being able to understand the extent that mitigation of this type will be achieved.	In accordance with other large construction schemes, MVDC considers that details of how the Noise Insulation Scheme will be promoted and administered to those properties predicted to be eligible, should be provided within 12 months of permission if granted.	Uncertain
<b>MV16</b>	<b>The Code of Construction Practice (CoCP) provides insufficient noise monitoring control and management of both long term work areas where (i) receptors will be exposed to intrusive noise for significant periods of time and (ii) areas of short term</b>	<p>Paragraph 5.9.15 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice), states that noise monitoring will be carried out to confirm the best practicable means. There is, however, insufficient information within the CoCP to identify areas of high noise impacts in advance of the construction work beginning.</p> <p>It is not acceptable to leave site specific monitoring to be determined in the Section 61.</p> <p>Policy requires adverse impacts to be mitigated and reduced. MVDC does not consider there to be</p>	The Council expects the CoCP to clearly identify the areas of greatest adverse impacts and where work is considered to be significantly above the Lowest Observed Adverse Effect Level (LOAEL) for an extended period of time (to be agreed) the Applicant is expected to offer an enhanced commitment to monitoring including, but not limited to, continuous monitoring.	Likely

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	<p><b>high impact events predicted to approach the Significant Observed Adverse Effect level (SOAEL)</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>sufficient support for contractors to assist them in demonstrating that they are managing and mitigating noise and other environmental impacts, such as vibration and dust (where appropriate).</p>	<p>For these sites the CoCP should be clear what types of noise and other environmental monitoring are expected to be provided by the main contractor. Different risk scenarios should be defined by the promoter and the quality and quantity of monitoring considered in advance. The qualification and specialist knowledge of the monitoring team should scale proportionately with the risk and there should be an independent oversight and complaints system outside of the contractors and the airport.</p> <p>On highest risk and most intrusive sites (e.g. 24 hour works compounds), the Council will expect continuous noise monitoring to be provided with suitable noise targets to be brought forward to mitigate and minimise</p>	

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			<p>adverse impacts at nearby sensitive residential receptors.</p> <p>Suitable systems for logging and managing complaints and reporting environmental performance should also be provided.</p>	
<b>MV17</b>	<p><b>Core Working Hours are unacceptable and inadequately defined, result in unacceptable disturbance from intrusive noise</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>Paragraph CoCP states: "Outside the airport boundary, the core working hours will be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 07:00 to 13:00 on Saturdays."</p> <p>These hours are considered to be unacceptable and would result in unacceptable disturbance from intrusive noise.</p>	<p>The undertaker needs to define shoulder periods which typically it would be expected to be 07:00 to 08:00 and 18:00 to 19:00 from which noisy activities will be excluded.</p> <p>Given the Control of Pollution Act 1974 (CoPA) and Environmental Protection Act 1990 (EPA) and the duration of the project, there would seem to be a strong argument to encourage the amended approach.</p>	Uncertain
<b>MV18</b>	<b>Identification of significant effects regarding traffic</b>	It is acknowledged that minor increases in road traffic noise is expected on Charlwood Road and Ifield Avenue. These impacts are stated as not significant but they could be if absolute levels at the properties are above the SOAEL.	Clarify the expected levels at the properties (based on the Basic Noise Level already calculated) to either:	Unlikely

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	<p><b>Document Ref(s): APP-171, General</b></p>	<p>The Council notes that later in the construction process there is significant related activity and concern is raised that this is not accompanied by robust traffic modelling. Such uncertainty also extends to concerns around the validity of transport modelling more generally. Should the modelling need to be re-run noise levels will again need to be reviewed.</p>	<p>1) demonstrate levels are below SOAEL and therefore the conclusion of no significant effects can be justified, or</p> <p>2) to acknowledge potential significant effects.</p> <p>The Applicant should be required to carry out a further assessment of construction transport management in 2029 to review and improve transport management practices.</p>	
<p><b>MV19</b></p>	<p><b>No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics</b></p> <p><b>Document Ref(s): APP-172, General</b></p>	<p>Context is provided to the assessment of ground noise through consideration of the secondary L<sub>Amax</sub> (maximum sound level), overflight, L<sub>den</sub> (average all day noise) and L<sub>night</sub> (average night time noise) 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.</p> <p>There is also concern over the time period for L<sub>den</sub> as GMT appears to be used when local time should be consistently applied.</p>	<p>The Council would like to see monthly movement data for the various scenarios as well as hourly movement data for annual movements by departure and arrival. This includes that for the periods within and outside of the summer.</p>	<p>Uncertain</p>

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			<p>If there becomes a significant disconnect between the summer period and other times of peak demand then MVDC contends that the summer impact is no longer representative. There is currently insufficient relevant information provided to enable understanding of the impacts.</p> <p>The Applicant needs to provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant identifying a significant effect.</p>	
<b>MV20</b>	<p><b>Noise impacts from 'end-around' runways need sufficient consideration</b></p> <p><b>Document Ref(s): APP-173, APP-176</b></p>	<p>The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate effectiveness.</p> <p>Details on ground noise model inputs, including</p>	<p>Further commentary and detailed assessments must be provided as part of the examination process to demonstrate the design and performance of the proposed barriers throughout all the years of the development.</p>	Uncertain

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		<p>source and bund locations, should be provided. While the Applicant suggests it has sought to address this issue following comments made in the pre-application and consultation stages, the Council does not agree and future impacts have been considered or will be mitigated.</p>		
<p><b>MV21</b></p>	<p><b>For engine ground running activities, the LAmax assessment does not adequately cover all sensitive receptor locations</b></p> <p><b>Document Ref(s): APP-173, APP-176</b></p>	<p>The assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB LAmax predictions by identifying car pass-by LAmax levels of 80dB. However, there is no attempt to contextualise LAmax engine ground running noise at any other receptor location.</p>	<p>LAmax engine ground running (EGR) noise levels should be contextualised at all receptor locations where the daytime LAmax exceeds 65 dB.</p> <p>As a minimum, the LAmax impacts on the closest adversely effected receptors must be provided in particular but not limited to:</p> <ul style="list-style-type: none"> <li>• Charlwood (receptor 2)</li> <li>• Brook Farm (receptor 3)</li> <li>• Bear and Bunny (receptor 4)</li> <li>• Hyders Farmhouse (receptor 9) &amp;</li> <li>• Myrtle Cottage (receptor 10)</li> </ul> <p>In addition, the assessment must include the estimated</p>	<p>Uncertain</p>



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			frequency and duration of these runs.	
<b>MV22</b>	<b>Prevention of breaches in the Noise Envelope</b>  <b>Document Ref(s): APP-177</b>	Throughout the Noise Expert Group (NEG) led community consultations and up until November 2022, the Applicant stated there would be an action level (noise limit) which would be provided to enable and guide the enforcement mechanism. This has not occurred.	Suitable action levels (noise limits) should be agreed	Likely
<b>MV23</b>	<b>Night-time Noise limit</b>  <b>Document Ref(s): Condition 14 of APP-006, APP-177</b>	The Noise Envelope does not make necessary attempts or provisions to restrict night time movements.	The final permission must, as a minimum, replicate the current Department for Transport night time movements controls.	Uncertain
<b>MV24</b>	<b>Insufficient consideration of mechanisms for the prevention of breaches in the Noise Envelope</b>  <b>Document Ref(s): Condition 14 of APP-006, APP-177</b>	<p>It has not been possible to identify any mechanisms in the Application documents that provide a proactive plan which manage and prevent exceedances. Nor is there any detail on what proposed actions or mitigation might take place to achieve compliance in the event of a forecast breach.</p> <p>Currently two consecutive retrospective breaches are required before capacity restrictions are proposed.</p>	<p>More detail should be provided on:</p> <ol style="list-style-type: none"> <li>1) proactive measures to prevent breaches; and</li> <li>2) when/what measures would be taken to avoid a likely breach.</li> </ol> <p>Action plans must be in place before a breach of the noise contour area limit occurs and the Applicant must give more thought and commitment to this.</p> <p>The controls in the DCO</p>	Uncertain

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			detailed under condition 15 need to be aligned with the final Noise Envelope document, once approved.	
<b>MV25</b>	<b>Independent forecasting should involve relevant local authorities</b>  <b>Document Ref(s): Condition 14 of APP-006, APP-177</b>	Any independent forecasting that needs to take place must ensure the involvement of relevant local authorities. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.	The Applicant and the local authorities should agree a pool of suitable aviation forecasting companies that are capable of carrying out this work. Once the contractor has been appointed by the local authorities, this work should be funded by the Applicant.	Likely
<b>MV26</b>	<b>Independent verification</b>  <b>Document Ref(s): Condition 14 of APP-006, APP-177</b>	Any review of the air noise modelling and associated works must be independently verified. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.	The Applicant should fund an independent review of the air noise modelling, associated works and noise monitoring. This should be carried out at five-yearly intervals as a minimum.	Uncertain
<b>MV27</b>	<b>Capacity declaration restrictions as a means of managing aircraft noise</b>  <b>Document Ref(s): APP-177</b>	Section 7.3 of the Environmental Statement (Appendix 14.9.7: Noise Envelope) sets out intended measures to restrict capacity declarations. However, these measures would not prevent new slots being allocated within the existing capacity. Neither are they an effective means of preventing future noise contour limit breaches, especially if a breach occurred in the previous year.	Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation.	Uncertain

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<b>MV28</b>	<p><b>Prevention of breaches in the Noise Envelope</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the Noise Envelope.</p>	<p>Adopt a set of thresholds that trigger preventative action. This would allow an action plan to pre-empt a breach.</p>	<p>Uncertain</p>
<b>MV29</b>	<p><b>Slow case fleet transition (replacing older aircraft with newer, quieter ones) is not an acceptable basis for setting the Noise Envelope</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>This issue has been previously raised by the Council and the Applicant. In its Issues Tracker (Application Document(s): Response to PD005), the Applicant considers this to have been resolved. MVDC does not agree and slow case transition continues to be considered unacceptable.</p> <p>There is no adequate comparison of future technology gains within the 2019 baseline and noise levels have been assumed to be constant within the fleet over the next ten years. Using the slow transition case, as the basis of the Noise Envelope, provides no incentive for GAL to seek faster fleet transition and secure noise and other environmental benefits. The central case should be utilised and a more proactive approach taken by the Airport.</p>	<p>The central case transition is considered to be more representative and should be supported by the Airport to limit environmental impacts.</p> <p>Forecasts and necessary assessment work should be amended accordingly in order to balance the impacts of growth.</p>	<p>Unlikely</p>
<b>MV30</b>	<p><b>Flexibility of noise contours limits accountability for airspace redesign and future aircraft technology</b></p>	<p>The Applicant is seeking the flexibility to increase noise contour area limits, depending on airspace redesign and noise emissions from new aircraft technology. Should the NRP obtain consent, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints</p>	<p>There should be no allowance for the Noise Envelope limits to increase</p>	<p>Unlikely</p>

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	<b>Document Ref(s): APP-177</b>	of the Noise Envelope to ensure that unacceptable alterations are contained as far as is reasonably possible.		
<b>MV31</b>	<b>CAA to regulate the Noise Envelope rather than relevant local authorities</b>  <b>Document Ref(s): APP-177</b>	There is no mechanism for local authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope.  To date, the CAA has not accepted a role regulating 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. Community representation should also be considered and positive examples of this are those in the Luton Environmental Scrutiny Group.	Uncertain
<b>MV32</b>	<b>Modelling 2019 Air Transport Movements (ATM) with 2032 fleet technology</b>  <b>Document Ref(s): APP-177</b>	Sensitivity testing of different growth rate scenarios (Appendix 14.9.7 The Noise Envelope) would help provide a better understanding of how noise may affect local communities in the future. The Council has consistent requested such testing to be carried out up to and including 2032, yet it has been argued that this is too far in advance to be material. The Council disagrees and this would be only eight years in the future.  Furthermore, various other data has been modelled to 2032 and beyond, without issue, and it is unclear why this sensitivity testing has not been provided within the relevant Environmental Statement.	Sensitivity testing for the longer term should be carried out.	Unlikely

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<b>MV33</b>	<b>Annual noise contour limits are necessary to understand the overall impacts from air traffic movements</b>  <b>Document Ref(s): APP-177</b>	<p>The noise contour area limits provided relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period. Use of the summer average LAeq is not representative of the intrusive noise experienced by residents impacted by aircraft noise and should be more broadly considered to be representative.</p>	<p>Representative annual noise contour limits should be more widely considered and included in the Noise Envelope</p>	<p>Uncertain</p>
<b>MV34</b>	<b>Failure to properly implement the Government's policy on Noise Envelopes (CAP1129)</b>  <b>Document Ref(s): App-039</b>	<p>Various national aviation guidance and policy refer to an approach where there should be a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development. Sharing benefits is a fundamental part of the Noise Envelope and it should be demonstrated how the benefits of new aircraft technology are to be shared between the airport and local communities. The Applicant has failed to accept that there is any policy obligation to share technology gains with the community and this cannot be supported.</p> <p>In the earlier iteration of the Environmental Statement (Chapter 14: Noise and Vibration), Paragraph 14.2.44 included detail on 'Sharing the Benefits'. The submitted and revised ES has removed this contrary to relevant policy.</p>	<p>It should be demonstrated, as part of the Noise Envelope, how the noise benefits of future aircraft technology is to be shared between the airport and local communities. Local authorities do not accept suitable measures have been considered in deriving a Noise Envelope that suitably shares technology benefits in the future. This is of detriment to the environment and the community.</p> <p>In accordance with policy requirements set out in the Aviation Policy Framework,</p>	<p>Unlikely</p>

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			the Applicant should review its approach and provide a necessary response to ensure policy compliance.	
<b>Transport</b>				
<b>MV35</b>	<p><b>Inadequate public transport provision to effect modal shift</b></p> <p><b>Document Ref(s): APP-258</b></p>	<p>The submitted application provides insufficient public transport provision for Mole Valley district as a whole and especially for the most populated areas in the north of the district in Dorking, Leatherhead and Ashtead.</p> <p>The approach to coaches, buses and support for local commuters is not necessarily deliverable and will not be effective and instead will be detrimental to the wider community and businesses. Additional public transport provisions to serve Mole Valley need to be provided and information on funding and agreements with relevant operators shared. It is the Council's view that a notable modal shift to sustainable transport mechanisms is unachievable and not based on realistic or reasonable assumptions and forecasting.</p> <p>For such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.</p>	More steps need to be taken by the Applicant to demonstrate deliverable public transport interventions and additional public transport provisions that serve Mole Valley need to be included.	Unlikely

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MV36	<p><b>Inadequate rail strategy</b></p> <p><b>Document Ref(s): APP-258</b></p>	<p>The Council considers that the Applicant’s assertions that “...no significant increase in crowding on rail services is expected as a result of the Project,” (Transport Assessment, paragraph 9.8.7) to be erroneous and has disregarded its own evidence which shows an increase in numbers and crowding. The proposals are consistently contradictory and does little for meeting expressed targets for modal shift away from the private car, despite making it clear that that the Gatwick Stations Upgrade project is intended to make rail travel to and from the airport more attractive.</p> <p>With such a unique and large scheme, there are real opportunities for economic and environmental benefits linked to increasing rail travel. No attempt has been made to take this up and the Applicant has not looked sufficiently beyond the NRP boundary to achieve this.</p> <p>It is not considered that the Applicant’s proposals will be in the public benefit and does not make the most of the linkages and available networks. Instead it relies on existing plans to accommodate passenger numbers and does not seek to fund schemes on the network at stations such as East Croydon and Dorking Deepdene which could affect a notable change for the benefit of the airport and wider economy.</p>	<p>If an increased rail offer is not to be made and delivered, it is necessary for the Applicant to carry out additional modelling which places less reliance on existing, planned non NRP-related rail improvements and reflects usage and which more closely reflect what is more likely to happen.</p>	<p>Unlikely</p>

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		With such a limited rail offer, accompanying road transport modelling must be updated to be more realistic about the levels of car use that will be more likely.		
<b>Socio-economic</b>				
<b>MV37</b>	<p><b>Overstatement of the wider, catalytic, and national level economic benefits of the NRP</b></p> <p><b>Document Ref(s): APP-042, APP-245, APP-250, APP-251, APP-252</b></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.	The impact methodology needs to properly account for the specific catchment area and demand characteristics of each of London’s 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.	Uncertain
<b>MV38</b>	<b>The forecasts for the use of the NRP are not based on a proper</b>	The demand forecasts have been developed ‘bottom up’ based on an assessment of the capacity that could be delivered by the NRP ( <b>See MV37</b> ). It is not	Additional market and demand analysis should be properly conducted with	Uncertain



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	<p><b>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</b></p> <p><b>Document Ref(s): APP-245, APP-250, APP-251, APP-252</b></p>	<p>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.</p>	<p>necessary and relevant adjustments made to London airport passenger projections which more accurately reflect the known and up to date situation. In this case it is known that Heathrow R3 is not going to be delivered and there are other known activities occurring within the wider London Airport network which could impact on the levels of competition and market share which can be considered by GAL in its demand analysis.</p>	
<b>MV39</b>	<p><b>The capacity deliverable with the NRP proposed development</b></p> <p><b>Document Ref(s): APP-245, APP-250, APP-251, APP-252</b></p>	<p>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 Standard Instrument Departure Navigation (SIDs), particularly given the commitment not to use WIZAD SID (tactical routing to avoid congestion) 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</p>	<p>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.</p>	Uncertain

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		delay acceptable to the airlines, will be lower than stated.		
<b>MV40</b>	<b>Issues with the deliverability of the Employment, Skills and Business Strategy (ESBS) and whether the proposals are robust or effective</b>  <b>Document Ref(s): APP-198</b>	<p>While the Council considers that the ESBS Objectives and themes are acceptable, the Council does not consider them to be 'SMART' and it is unclear whether the S106 or some other mechanism will be able to set out the specifics and provide a base which can be monitored. There appears to be no costing or clear resourcing implications which again lessens confidence that the outputs are any more than hypotheticals at this time.</p> <p>The ESBS is predominantly based upon on what could be done/achieved and not what will.</p>	The ESBS needs to map out clear projects, partnerships, costings and resource implications to demonstrate deliverability.	Uncertain