

**Gatwick Northern Runway Project DCO
PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT (PADSS)**

This report has been prepared by East Sussex County Council (ESCC), with input from the joint authorities and appointed consultants where required. This document identifies the initial principal areas of disagreement that have been identified when reviewing Gatwick Airport's (GAL's) Development Consent Order (DCO) documentation.

Principal Areas of Disagreement Summary Statement (PADSS) from East Sussex County Council			Version Number: 1 Submitted at: October 2023	
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1	The capacity deliverable with the Northern Runway Project (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 GAL, having regard to the latest Department for Transport forecasts and having regard to the potential for additional capacity to	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.	Robust market analysis and specific modelling of the share of demand that might be achieved at GAL 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.

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	be delivered at other airports. The demand forecasts are considered too optimistic.	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.		
3	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	<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.</p> <p>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.</p> <p>The national economic impact assessment should robustly test the net impact of expansion at GAL having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</p>	Uncertain – subject to remodelling of impacts by GAL.
Transport & surface access				

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4	4.3 Regional and Local Planning Policy Context of the Transport Assessment	Reference is made to LTP3 for East Sussex County Council, but no mention of the relevant objectives/ policies/ approaches contained within	<p>The LTP3 specifically includes:</p> <ul style="list-style-type: none"> • The rail network and standard of train services in the county are restricted by shortcomings in the infrastructure which affects east/west movements along the coastal corridor, connections to Brighton, Ashford and GAL, and also between Hastings and London. • Restricted rail network affecting connections to GAL • Improvements to the A23 and GAL 	Likely
5	9 Public transport: rail of the Transport Assessment	The model contains all rail services in the modelled area. However, the assessment focuses on services on the North Downs Line, Arun Valley Line and Brighton Main Line	The applicant should include the East Coastway line between Brighton and Hastings as a key corridor to join the BML for access to GAL	Uncertain – potentially subject to remodelling <u>or</u> well evidenced acceptable justification as to why this has not been included
6	Page 36 (12-33) of the Transport Environmental Statement	Reference to East Sussex CC comment in PEIR to Extend scope of modelling to include Ashdown Forest. The Area of Detailed Modelling includes the Ashdown Forest area.	Not clear whether this has this includes all the relevant Ashdown Forest area. Wish to see a map of the modelled area for clarification	Uncertain – potentially subject to remodelling

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7	5.4.1: Surface Access Commitments (Doc Ref. 5.3)	<p>Whilst we support the proposals for bus service improvements between GAL Airport and East Sussex there is scope for further improvements</p> <p>With there being no direct rail connections from much of East Sussex, and therefore the only option for passengers / employees to travel to the airport by private car / taxis, there must be investment into bus services to provide a public transport alternative</p> <p>Bus service improvement</p>	<p>Would like to see:</p> <ul style="list-style-type: none"> • Crowborough – GAL route to run via Forest Row and East Grinstead (in combination with an Uckfield – Forest Row – East Grinstead – service would double the frequency between Forest Row and GAL) • extend the 261 route beyond East Grinstead to provide a direct service between Uckfield and GAL • Extend the proposed Gatwick-Uckfield service to Heathfield • Extend bus operational times to include early mornings, evenings and weekends <p>Consideration given to Heathfield being an extension to the Uckfield – Gatwick service. Important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield</p>	Uncertain – dependent upon funding
8	Surface Access Commitments (SACs) and target mode shares	Concerns are held about the Surface Access Commitments that underpin the creation of a new Surface Access Strategy and the approach to meeting and	Surface Access Commitments and associated mitigation to be reviewed and amended.	TBC

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		<p>monitoring these targets. Some of the concerns include:</p> <ul style="list-style-type: none"> • Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020 (Paragraph 12.6.11 ES Chapter 12 Traffic and Transport). • Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit significant increases in car trips to and from the airport. • Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable infrastructure to successfully meet some of the target modal splits. 		

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		Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The applicant has not assessed or considered the attractiveness of modes or how this could be increased. For example, by providing enhanced bus priority measures to provide journey time savings.		
Air quality				
9	Missing figures and the lack of clear study area information makes it difficult to understand traffic changes in the different scenarios. This in turn makes it difficult to understand if effects predicted at receptors are reasonable over the	<p><i>Document 5.1, Chapter 13</i></p> <p>Paragraph 13.5.5 of the ES air quality chapter refers to a 'wider study area' (beyond the 11km by 10km domain), plus the modelled affected road network (ARN) outside this area. This is shown on Figure 13.4.1.4.1.1. The ES Air Quality Figures – Parts 1, 2, 3, 4 and 5 have been reviewed, and this figure cannot be identified.</p> <p>Currently, figures within Part 3 just show a wider study area domain,</p>	GAL needs to supply further information to clarify the routes affected in both the construction and operational phases. Additionally, the roads within the 11km by 10km domain which have met the ARN criteria should be illustrated separately for the construction and operational phases. This will inform our understanding of where the greatest air quality effects should be anticipated in this domain.	Likely

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	construction and operational phases.	not the actual roads meeting the ARN criteria (e.g. Appendix 13.6.1 Figure 2.3.1). This figure should be provided to illustrate the affected road network. No further information on the road traffic air quality study was identified in ES Appendix 13.4.1: Air Quality Assessment Methodology. However, reference to the above missing figure is made within this ES Appendix document, suggesting it has been missed in the collation of this ES Appendix.		
10	The scenarios assessed in the Environmental Statement do not provide a realistic worst-case assessment.	<p><i>Document 5.1, Chapter 13</i></p> <p>Several clarifications are required to understand the Assessment Scenarios sub-section of the chapter. Paragraph 13.5.23 includes a bullet point list of assessment scenarios, including scenarios covering 2029 for both the construction and operation of the proposed development.</p> <p>Paragraph 13.5.24 provides further detail for the 2029 scenarios, noting there are two assessment scenarios</p>	<p>GAL needs to clarify how:</p> <ul style="list-style-type: none"> • The use of two parallel scenarios for 2029 provides a realistic worst case for evaluation. A single scenario reflecting the anticipated operation of the increased capacity at the airport with the surface access construction works is the realistic worst case in 2029. • Operational activities and ongoing construction work in 2032 have been assessed. • The selection of assessment years and their configuration re operational and construction was 	Uncertain

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		<p>for this year. Additional information is provided in paragraph 13.5.25 which reiterates that there are two separate scenarios for operational and construction situations, due to limitations within the traffic modelling.</p> <p>Paragraph 13.5.26 then provides information on a slow fleet transition case (SFT) relating to airline fleet assumptions, referencing 2029 as the first full year of opening, 2032 as an interim year and 2038 a design year. For the 2032 scenario, no mention is made that some construction works will still be ongoing (See ES Appendix 5.3.3: Indicative Construction Sequencing).</p>	made, and how this aligns with the requirements of the Airports National Policy Statement.	
11	Operational monitoring should be agreed during the examination.	<p><i>Document 5.1, Chapter 13</i></p> <p>Operational monitoring will be crucial to understand if measured air quality is following modelled prediction. There is no information in either the air quality chapter or the Surface Access Commitments document on how air quality data</p>	GAL should agree the details of the s106 operational monitoring, and how this will be used to test the effectiveness of the Surface Access Commitments.	Likely

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		will be reviewed to check that changes are in-line with predictions, nor what measures would be taken if a significant adverse deterioration occurred.		
12	Air quality actions are split cross multiple documents. A single Air Quality Action Plan is needed.	<i>Document 5.1, Chapter 13</i> Paragraph 13.9.3 states that the operational phase mitigation measures are set out in two documents: the Carbon Action Plan and the Surface Access Commitments. This makes it difficult to identify measures that focus on air quality improvement. This approach differs from previous discussions, where a draft Air Quality Action Plan was provided in 2022.	GAL should draw up an Air Quality Action Plan.	Uncertain
13	Using the application documents, is not possible to relate the figures to the results set out in the appendices tables	<i>Document 13.6.2</i> The receptor tables include most of the expected information, including a receptor ID reference. However, the tables (e.g. Table 2.1.1 and Table 2.4.1) do not identify which figure the receptor listed is shown, as would be typically expected, to	GAL should update receptor figures to present receptor IDs. Additionally, a column identifying the local authority location for each receptor would be extremely useful. Note: this links to our concerns over the impacts of air quality on Ashdown Forest (which is an area of European Ecological Importance, Special Area of	Likely

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		<p>allow readers to move between the appendix, chapter and figures.</p> <p>However, as receptors are not labelled by ID this is therefore not possible in this ES. The reader needs to plot the grid references provided to understand where a receptor is.</p>	<p>Conservation, and a Site of Special Scientific Interest (SSSI). Need to consider these impacts as part of the modelling work being undertaken (air quality - nitrogen deposition issues arising from additional traffic through Ashdown Forest).</p>	
14	Lack of sensitivity analysis on the anticipated modal shift, and the associated air quality impacts.	<p><i>Document 5.1, Chapter 12</i></p> <p>Paragraph 12.8.6 of the traffic and transport chapter sets out a variety of measures to produce the modal shift assumed with the proposed development. Within the assumptions, there are controls on on-site parking numbers, parking charges and forecourt access charges. There is insufficient sensitivity analysis on these figures, including the impact on air quality if they are not achieved.</p>	<p>GAL should supply further details on their assumptions around off-airport parking (both approved and unapproved), sensitivity of the anticipated modal shift is to any variation in these assumptions, and the air quality impacts of lower levels of modal shift.</p>	Uncertain
Carbon emissions				
15	Failure to consider risks raised by the Climate Change Committee, which warns that the UK Jet Zero policy is non-	<p><i>Document 5.1, Chapter 16</i></p> <p>Section 16.12.3 states, "<i>Given the overarching contribution to emissions arise from aviation, and the policy context in the UK the</i></p>	<p>GAL needs to analyse and assess the 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</p>	Unlikely

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	compliant with the UK's net zero trajectory, and the cumulative effects of airport expansion plans.	<p><i>reflects the Jet Zero Strategy (Department for Transport, 2022), it is concluded that the overall impacts arising from the Project are not so significant that the Project would have a material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets. On this basis the overall assessment concludes that the Project has a Minor Adverse Not Significant impact.</i>" This is not a safe assumption to make, for two reasons.</p> <p>First, modelling for Jet Zero did not include all current UK airport expansion plans, most notably additional runways at both Heathrow and GAL. The assumptions on airport capacity used to inform the modelling are therefore out of date.</p> <p>Second, the Government's advisory body for climate change, the Climate Change Committee (CCC), issued concerns around airport</p>	<p>IEMA GHG Assessment Guidance (2022).</p> <p>GAL needs to provide an updated cumulative assessment that considers the combined impact of all planned expansion at major UK airport and how this could impact the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p>	

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		<p>expansion as part of their 6th budget report (June 2023). Specifically, they stated that:</p> <ul style="list-style-type: none"> • The Jet Zero strategy had a "Reliance on nascent technology. <i>The Jet Zero Strategy approach is high risk due to its reliance on nascent technology – especially rapid SAF uptake and aircraft efficiency savings – over the period up to the Sixth Carbon Budget. The Government does not have a policy framework in place to ensure that emissions reductions in the aviation sector occur if these technologies are not delivered on time and at sufficient scale.</i> • They have concerns around "Airport expansion. The Committee's Sixth Carbon Budget Advice recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions.³ Since making this recommendation the Committee has noted that 		

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		<p>airports across the UK have increased their capacities and continue to develop capacity expansion proposals. This is incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate this additional demand. No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects.</p> <p>Given these factors, the ES has not complied with the IEMA (2022) GHG Assessment significance guidance and has come to the wrong conclusion. In alignment with the IEMA (2022) GHG Assessment significance guidance, the Project should be considered Major Adverse, which is defined as "<i>the Project's GHG impacts are not mitigated or are only compliant</i>"</p>		

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		<i>with do-minimum standards set through regulation, and do not provide further reductions required by existing local and national policy for projects of this type. A project with major adverse effects is locking in emissions and does not make a meaningful contribution to the UK's trajectory towards net zero."</i>		
16	Carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the Environmental Statement methodology.	<p><i>Document 16.9.1 (table 2.1.1), 16.9.2 (table 2.1.1) and 16.9.4</i></p> <p>Not accounting for WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology in Section 16.4.18, where scope 3 emissions were included.</p> <p>Furthermore, this also contradicts the GHG ES Methodology referenced under Section 16.4.24, which states "<i>GHG factors are drawn from a range of national and international sources. Where these factors are expected to change over the duration of the Project then a time-based factor is used, based on</i></p>	GAL needs to update the GHG ABAGO assessment to account for WTT emissions.	Likely

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		<p><i>estimating the extent and rate at which the factor will change. This estimation process draws on industry standards, industry-specific guidance, and a range of other UK and government policy and strategy documents."</i></p> <p>Additionally, the approach taken goes against the UK Government's carbon accounting methodology from BEIS (2022)¹, which recommends that "<i>Well-to-tank (WTT) fuels conversion factors should be used to account for the upstream Scope 3 emissions associated with extraction, refining and transportation of the raw fuel sources to an organisation's site (or asset), prior to combustion."</i></p> <p>WTT emissions represent a significant portion of fuel emissions (around 20%) and need to be accounted for.</p>		
17	It is not clear how or if GAL converted CO ₂ emissions from aircraft to CO ₂ e.	<p><i>Document 16.9.4, section 1.2.3</i></p> <p>This states that "<i>The estimation of GHG emissions arising from aircraft</i></p>	GAL needs to confirm if a conversion was undertaken from CO ₂ to CO ₂ e. If not, the Applicant should update the	Likely

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		<p><i>is based on estimating fuel consumption for each of the four use categories, and then using an appropriate CO₂ emissions factor per unit of fuel to model total CO₂e emissions”.</i></p> <p>It is not clear if a conversion was undertaken from CO₂ to CO₂e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023)¹. Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO₂e in 2028 in the most carbon-intensive year where 5.327 MtCO₂e was estimated to be released (Table 5.2.1).</p>	GHG Aviation Assessment to account for this.	
18	GAL does not identify the risks associated with using carbon offset schemes.	<p><i>Document 5.4.2, Section 1.14</i></p> <p><i>This states that, "In 2016/17, we achieved 'Level 3+ - Neutrality' status under the Airport Carbon Accreditation scheme, which is a global carbon management certification programme for airports</i></p>	GAL should show complete transparency and state the offset scheme they intend to use.	Likely

¹ <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

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		<p><i>(Ref 1.1). GAL has been working hard to reduce carbon emissions under GAL's control (from a 1990 baseline) and offset the remaining emissions using internationally recognised offset schemes."</i></p> <p>The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme.</p>		
19	<p>GAL indicates it is relying upon Renewable Energy Guarantees of Origin ("REGO") to achieve its Net Zero and Zero Carbon commitments. However, purchasing REGO certificates does not necessarily reduce emissions from grid electricity consumption to zero.</p>	<p><i>Document 5.4.2 (section 3.1.2)</i></p> <p><i>This states "For emissions that occur outside the Gatwick Airport site boundary where GAL can make an impact, we have already taken action, such as electing to purchase 100% Renewable Energy Guarantees of Origin ("REGO") electricity since 2013 and installing 22 charging points for airport ground operation vehicles in 2019 (Ref. 1.6)."</i></p>	<p>GAL should address the concerns around relying on REGO's to make the claim that GAL will "achieve Net Zero for GHG emissions under our control (GAL Scope 1 and 2) by 2030. Gatwick will achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040 for scope 1 and 2 by 2040".</p>	Likely

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		The guidelines for the UK Government Streamlined Energy and Carbon Reporting (SECR) advise, " <i>Where organisations have entered into contractual arrangements for renewable electricity, e.g. through Power Purchase Agreements or the separate purchase of Renewable Energy Guarantees of Origin (REGOs), or consumed renewable heat or transport certified through a Government Scheme and wish to reflect a reduced emission figure based on its purchase, this can be presented in the relevant report using a "market-based" reporting approach. It is recommended that this is presented alongside the "location based" grid-average figures and in doing so, you should also look to specify whether the renewable energy is additional, subsidised and supplied directly, including on-site generation, or through a third party.</i> "		
20	It is not clear if construction electrical energy	<i>Document 16.9.1</i>	GAL needs to update the GHG Construction assessment to account	Likely

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	consumption emissions were considered in the ES.	Calculations or an estimate on electrical energy use during construction should be calculated as part of the construction GHG Assessment. Without this, the energy-related emissions in the ES for construction are potentially underreported.	for electrical energy use during construction.	
21	BEIS 2023 GHG intensity factors are not used as a data source for the Future Baseline.	<i>Document 16.9.2 (table 3.2.1)</i> For the Green Book Supplementary Guidance, BEIS (2023) emission factors are used, contradicting the BEIS (2022) GHG intensity factors stated in Table 3.2.1.	GAL needs to explain why the GHG intensity factors and future grid electricity carbon factors were not aligned from the 2023 database.	Likely
Climate change (impacts)				
22	Inconsistency and lack of detail in some climate impact statements.	<i>Document 5.1 (tables 15.8.5 and 15.8.6)</i> The climate impact statements (detailed in Table 15.8.5 and Table 15.8.6) are lacking in consistency in the way they are articulated in that some are missing an 'impact.' They have a cause e.g. 'increased flooding' and an 'event' e.g. 'flooding of electrical equipment' but no end 'impact' e.g. resulting in increased maintenance	GAL should update all climate impact statements to have a clear end impact so that all risks are described in a consistent way.	Uncertain.

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		requirements OR resulting in operational downtime. This result is what should determine the consequence rating and the approach taken could have led to an underestimation of risk.		
23	Mitigation measures are needed to reduce the impact of Urban Heat Island (UHI) effect.	<p><i>Document 15.5.2</i></p> <p>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 any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.</p>	GAL should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	Likely
Economy				
24	Concern over lack of consideration of economic impacts on East Sussex	It is unclear what the economic impacts of the NRP on East Sussex would be	<p>There is a need for the applicant to fully set out the economic impacts of the Northern Runway proposal.</p> <p>There is a need to further understand the employment and skills offer arising from the NRP. We would expect substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that the airport</p>	Uncertain

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			work with local training providers and colleges in East Sussex to ensure that training, pathways and careers opportunities are offered.	
25	Concern over lack of consideration of economic impacts on East Sussex	Need for reassurances that the subcontractors are delivering social value and working to the appropriate benchmark and procurement frameworks	GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff) Sub-contractors should work to the CITB national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement	Likely
26	Concern over lack of consideration of economic impacts on East Sussex	The Employment Skills and Business Strategy (ESBS) should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.	Include information in the ESBS to cover this	Likely
27	Concern over lack of consideration of economic impacts on East Sussex	In non-construction, the option should include upskilling existing workforce which includes residents of East Sussex	Include upskilling existing workforce in the ESBS	Uncertain
28	Concern over lack of consideration of	There is a need to ensure that SMEs and subcontractors include social value measures in their provision	Social value element in SME/Sub-contractor contracts mirror provision in GAL's ESBS	Likely

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	economic impacts on East Sussex	that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.		
29	Concern over lack of consideration of economic impacts on East Sussex	GAL should develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should develop (not just promote) international trade opportunities with destinations aligned to LGW's route network	Development of Inward Investment Service and Strategy by GAL	Uncertain

NOISE AND VIBRATION

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Noise impacts on East Sussex				
30	Lack of detail on noise impacts for East Sussex	Concerned that the impacts of noise on East Sussex communities has not been adequately addressed and assessed, and that appropriate mitigations will not be in place	Expect GAL to provide greater clarity on how many more flights would be passing over East Sussex, which locations would be the most affected and how this would be mitigated. This includes paying particular attention to sensitive and protected areas, such as Ashdown Forest.	Likely
31	Clarification on estimated overflight mapping	There is a need for assurances on the accuracy and reliability of the estimated overflight mapping, and we will require East Sussex to be included as part of this.	GAL to respond on this point. If East Sussex has not been included we would wish the overflight mapping to be revisited to include the county, and the results updated and shared as appropriate for consideration.	Uncertain
32	Capping of night flights to protect local communities	Concern that the use of the northern runway will increase the negative	Night flights will need to be restricted / capped, and the Northern Runway should	Uncertain

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
		impacts of aircraft noise on local communities at night – impacting detrimentally on physical and mental health and wellbeing.	not operate, between the hours of 23:00 and 06:00. We need assurances that there are not dispensations that GAL can routinely operate within this restricted night-time period, notwithstanding use of aircraft at night for emergencies.	
Legislation, policy and guidance				
33	Interpretation of the Overarching Aviation Noise Policy	Paragraph 14.2.44 of the Environmental Statement Chapter 14 Noise and Vibration – 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.	It should be demonstrated as part of the Noise Envelope how the noise benefits of future aircraft technology are shared between the airport and local communities. This is a policy requirement set out in the Aviation Policy Framework.	Uncertain
Assessment of significant effects – Air Noise				
34	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	Provide an assessment of likely significant air noise effects on non-residential receptors.	Likely

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		receptors. Non-residential receptors should be considered on a case-by-case basis with assessment criteria defined depending on the non-residential use.		
35	The assessment switches between discussing properties and population depending on whether noise is between LOAEL and SOAEL (population) or above SOAEL (properties)	The assessment should cover both properties and population and be consistent when identifying significant effects to aid their understanding.	Provide an assessment of likely significant air noise effects covering both properties and population.	Likely
36	Identification of population exposed to noise above SOAEL and between LOAEL and SOAEL	It is not clear what population is exposed to changes in noise above SOAEL and between LOAEL and SOAEL in Table 14.9.10 and 14.9.11	It would be helpful to provide tables identifying the population exposed to changes in air noise at absolute noise levels between LOAEL and SOAEL and for population experiencing absolute air noise levels exceeding SOAEL	Likely
37	Properties that are newly exposed to noise levels exceeding the SOAEL are not identified	It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine compliance with the first aim of the ANPS	Identify how many and the location of properties newly exposed to noise levels exceeding the SOAEL	Likely

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	Paragraph 14.9.98 of the Environmental Statement Chapter 14 Noise and Vibration states that there would be reduced movements on the main runway resulting in Minor Beneficial effects	It is not clear if these Minor Beneficial effects would continue through the project lifespan when more capacity is taken up and the main runway may return to current intensity of operations	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Likely
38	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.	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Likely
39	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 L _{Amax} , overflight, L _{den} and L _{night} 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

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Document name: Appendix 14.9.2 Air Noise Modelling				
40	Assurances that areas of East Sussex below 7,000 feet have been included in the air noise modelling work	Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level.	It is understood that some aircraft (GAL related air traffic) do pass over parts of East Sussex below 7,000 feet. Therefore we require such areas to be included as part of the air noise modelling work. For example, Crowborough which has areas which are 794 feet above sea level. Also, Ashdown Forest which is a noise sensitive area.	Likely
41	No details on the 92-day summer average aircraft fleet for each scenario are provided	It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets	Provide aircraft fleets for each modelled scenario	Likely
42	No details of the noise modelling or validation process 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	Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided	Uncertain

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43	No details of measured Single Event Level or LASmax noise data from the Noise-Track-Keeping are provided	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.	Provide Single Event Level and LASmax noise data for individual aircraft variants	Uncertain
Document name: Appendix 14.9.7 The Noise Envelope				
44	Slow fleet transition noise contour area limits	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	Noise contour area limits should be based on the Central Case	Unlikely
45	Annual noise contour limits	Noise contour area limits 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.	Annual noise contours should be included in the Noise Envelope	Uncertain
46	Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	GAL wants flexibility to increase noise contour area limits depending on airspace redesign and	There should be no allowance for the Noise Envelop limits to increase	Uncertain

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
		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		
47	CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for local authorities to review Noise Envelope reporting, take action against breaches or review any aspects of the Noise Envelope	A mechanism should be included to allow the local authorities to scrutinise noise envelope reporting and take action in the case of any breaches	Uncertain
48	Adoption of an action plan	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	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.	Uncertain
49	Capacity declaration restrictions as a means of managing aircraft noise	This would not prevent new slots being allocated within the existing capacity	Slot restriction measures should be adopted in the event of a breach being	Uncertain

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
		and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year	identified for the previous year of operation	
Document name: Appendix 14.9.8 Noise Envelope Group Output Report				
50	Airbus NEOs (New Engine Option) are stated to be up to 5 dB quieter departure and 3 dB quieter on approach.	This statement is misleading as these levels of noise reductions are not achieved by Airbus A320Neo or A321Neo, which are the main Airbus variants that will be operational at GAL in the future.	Provide a more realistic reduction in noise that is provided the NEO aircraft	Likely