

The Planning Inspectorate
National Infrastructure Applications Team
Temple Quay House
Temple Quay
Bristol
BS1 6PN

FAO: Kevin Gleeson (Lead Member of the Examining Authority)

27 October 2023

Dear Mr Gleeson,

Application for a Development Consent Order by Gatwick Airport Limited for the Gatwick Airport Northern Runway Project (Ref. TR020005) – Response to a Procedural Decision made by the Examining Authority under section 89(3) of the Planning Act 2008

Further to our submission dated 15 September 2023 [[AS-020](#)] in response to your Procedural Decision letter of 8 September 2023, we are writing to you to provide an update on the development of the Issues Trackers and discussion with the Joint Local Authorities (JLAs) on the same.

We would like to notify you that the Updated Issues Tracker was submitted to the JLAs on 24 October 2023. We are meeting them on 31 October 2023 with the intention of agreeing with them how the Updated Issues Tracker will inform the development of a Statement(s) of Common Ground (SoCG).

Local Authorities Issues Trackers

In our 15 September 2023 submission, we enclosed a copy of our letter and the accompanying Issues Tracker in Annex A1 [[AS-020](#)] that were issued to the Joint Local Authorities (JLA) on 18 August 2023. We have subsequently updated the Issues Tracker (now referred to as the 'Updated Issues Tracker') to include the additional issues raised by the JLAs in September 2023 following their review of the Issues Tracker (and as were submitted to, and accepted by, the Examining Authority [[AS-026 to AS-059](#)])

For ease of identification of the relevant issues, we have divided the composite Updated Issues Tracker into the following twenty thematic based tables, which contain the complete list of the issues raised by the JLAs:

- Table 1: Agricultural Land Use and Recreation
- Table 2: Air Quality
- Table 3: Socio-economics and Economics
- Table 4: Planning Baseline Projects
- Table 5: Transport
- Table 6: Ground
- Table 7: Heritage
- Table 8: Ecology
- Table 9: Landscape
- Table 10: Water Environment
- Table 11: Major Accidents and Disasters

- Table 12: Health
- Table 13: Noise and Vibration
- Table 14: Carbon and Climate Change
- Table 15: Cumulative Impacts
- Table 16: Forecasting
- Table 17: Capacity and Operations
- Table 18: Waste and Materials
- Table 19: Project General Mitigation and Other Matters
- Table 20: Draft DCO and Explanatory Memorandum

This consolidated Updated Issues Tracker, incorporating the twenty thematic tables, was issued to the JLAs on 24 October 2023. A copy of the cover letter and the consolidated Updated Issues Tracker are included as Annexes A and B to this submission respectively.

As noted in the cover letter to the JLAs (Annex A), GAL's responses to the JLA issues shared in August 2023 [AS-020] remain within the tables for completeness (in the column titled 'GAL Response as captured in the Trackers shared August 2023'). We have supplemented these responses with an additional column that details any relevant updates to the initial responses (some of which date back to the time of the pre-application statutory consultation(s)), and corresponding signposting to the application documentation, to ensure those responses are contemporaneous and complete.

Responses to the most recent issues raised in September 2023 are provided in the adjacent column ('GAL Response as of October 2023'). For these issues, GAL has detailed its response and provided signposting to where further information is provided within the DCO application, including document reference numbers as per the Planning Inspectorate's Examination Library.

GAL has proposed to the JLAs that these thematic tables are updated with any new issues raised through the Relevant Representations and/or the Principal Areas of Disagreement Summary Statements (PADSS), but that we then 'freeze' the consolidated Issues Tracker and use it to develop the SoCG, which GAL considers to be (along with the PADSS) the most appropriate format to record the status of agreement (or not) on all issues (including any new matters raised) to inform the examination of the Project.

We note the JLAs suggestion to have the Issues Tracker as an 'active' document that is to be updated as the SoCG are developed and updated. However, as explained in the cover letter (in Annex A) GAL does not consider this would be an efficient use of either party's resources and would simply duplicate effort spent in engaging on the contents of the SoCG and PADSS and reflect the same substantive informational output. We intend to discuss this approach with the JLAs at the meeting set for 31 October 2023 with a view to reaching agreement on this point and we would be very happy to address any queries/observations the ExA has on this proposed approach and any suggestions as to how we could best assist with the examination of the Project.

Statements of Common Ground

In Annex C of our previous response [AS-020], we set out the parties with whom GAL intends to enter into a SoCG and undertook to provide an update prior to the close of the relevant representations period (29 October).

To confirm, no additional parties have come forward with a request for a SoCG at this point and so that list in Annex C remains GAL's proposed list of SoCG counter-parties at this point in time.

In terms of progress and as noted above, GAL proposes to use the meeting set for 31 October 2023 with the JLAs to agree the approach to progressing the SoCG.

In addition, the agenda for this meeting includes agreeing whether there will be one SoCG with the JLAs or individual ones with each relevant authority.

With respect to other stakeholders, GAL has continued technical engagement with the intention of enabling these discussions to inform the development of each SoCG. We expect that discussions will progress following the submission of their relevant representations (where applicable) and hope to submit draft copies of each SoCG at the first deadline of the examination.

Errata

GAL notes the submission from Horsham District Council [[AS-059](#)] in which an error has been identified within **ES Chapter 12: Traffic and Transport** [[APP-037](#)] and the **Transport Assessment** [[APP-258](#)]. These documents include an omission where Horsham District Council has not been identified as being invited to the Topic Working Group (TWG) meetings on Transport. This omission was made in error and GAL will correct this errata in both documents as part of its next submission in response to the Procedural Decision issued 24 October 2023 [[PD-006](#)], which will be submitted on 14 November 2023.

The Applicant considers that the above addresses the outstanding requests for information issued by the Examining Authority in the letter dated 8 September 2023. However, if the Applicant can be of any further assistance or the Examining Authority considers any further clarification is required in response to the information and documentation submitted as part of this response, please do not hesitate to contact the Applicant using the details already provided.

Yours sincerely,

Jonathan Deegan
NRP Programme Lead
Gatwick Airport Limited

Enclosed as part of this letter:

- Annex A: Cover Letter to the JLAs in relation to the Updated Issues Tracker, dated 24 October 2023
- Annex B: Updated Issues Tracker (October 2023)



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Annex A: Cover Letter to the JLAs in relation to the Updated Issues Tracker, dated 24 October 2023

24TH OCTOBER 2023

Mr C. Smith
Chair of Gatwick Officers Steering Group
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ

Sent by email to  [Crawley.gov.uk](mailto:info@ Crawley.gov.uk)

Dear Clem,

Gatwick Airport Northern Runway DCO - NRP Local Authority Issues Tracker

I write further to the receipt of the following correspondence on this subject on the dates specified:

- Crawley Borough Council, submitted 15th September 2023
- West Sussex Country Council, submitted 15th September 2023
- Horsham District Council, submitted 15th September 2023
- Surrey County Council, submitted 18th September 2023
- Mole Valley District Council, submitted 18th September 2023
- East Sussex County Council, submitted 18th September 2023
- Tandridge District Council, submitted 18th September 2023
- Reigate and Banstead District Council, submitted 18th September 2023
- Mid Sussex District Council, submitted 18th September 2023

We have taken each point raised in this recent correspondence and added them into the Issues Trackers that we shared with you in August 2023 to create a composite Updated Issues Tracker (dated October 2023) as you requested. For ease of identification of the relevant issues, we have divided the composite Updated Issues Tracker into the following twenty thematically based Tables:

Table 1: Agricultural Land Use and Recreation

Table 2: Air Quality



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Table 3: Socio-Economics and Economics

Table 4: Planning Baseline Projects

Table 5: Transport

Table 6: Ground

Table 7: Heritage

Table 8: Ecology

Table 9: Landscape

Table 10: Water Environment

Table 11: Major Accidents and Disasters

Table 12: Health

Table 13: Noise and Vibration

Table 14: Carbon and Climate Change

Table 15: Cumulative Impacts

Table 16: Forecasting

Table 17: Capacity and Operations

Table 18: Waste and Materials

Table 19: Project General Mitigation and Other Matters

Table 20: DCO and Explanatory Memorandum

Gatwick Airport Limited's (GAL) responses to the JLA issues shared in August 2023 remain in the Tables for completeness. However, we have supplemented these responses with an additional column that details any relevant updates to these initial responses, and to the corresponding signposting to the application documentation where this was considered appropriate and helpful.

For the additional rows incorporating your most recent issues (i.e. those in the correspondence in September 2023) we have detailed GAL's response and provided a signposting to where further information is provided in the application, detailing the relevant document reference numbers in the PINS' Examination Library.

We look forward to meeting with you and other JLA colleagues on Tuesday 31st October to agree how we may move forward with the Statement of Common Ground process, having regard to the information provided to you in the enclosed. We note your request for this Tracker to remain as an 'active' document and for it to be updated as the SoCG is/are drafted.



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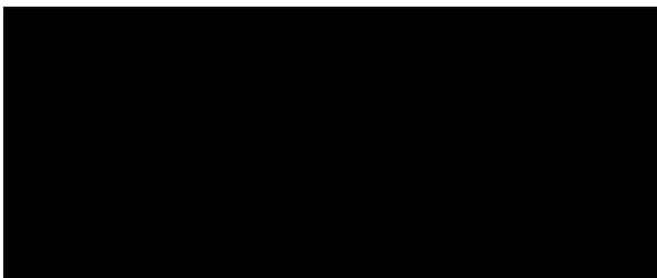


We would instead propose that the thematic issues tables are updated by GAL with any new issues raised in the relevant representation/PADSS, that GAL then provides its responses to these and that the document is then 'frozen' and used to develop the SoCGs, which will thereafter (along with the PADSS) record the status of agreement (or not) on all issues (including any new matters raised) throughout the examination. As discussed before, it does not seem useful or efficient to duplicate our respective work by making equivalent updates to the Issues Tracker alongside this. We would hope that the principle of that process can now be agreed; however, we are very happy to discuss any residual concerns you may have with this approach when we meet.

We would also like to agree with you, in the same meeting on 31st October, the principle of having one SoCG between GAL and the JLA or individual SoCG between GAL and each relevant authority individually. We are happy to do this either way to suit the JLA's preferred approach, but it would be useful for all parties if we can fix this as soon as possible and preferably at the 31st October meeting. We would therefore request that the JLA reach a view on their preferred approach before that date if possible.

We hope all of this is clear but if you have any immediate queries on the information provided, please do not hesitate to contact me.

Yours sincerely,



Jonathan Deegan

NRP Programme Lead
London Gatwick



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Annex B: Updated Issues Tracker (October 2023)



Gatwick Airport Northern Runway Project

Updated Issues Tracker, October 2023

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Table 1: Agricultural Land Use and Recreation

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
1.1	Soil Surveys	We note that soil surveys have been undertaken but request that the methodology is shared	JLAs	The methodology is provided in Section 18.4.11 of the PEIR and includes a standard method for ALC survey work with hand auger borings located at a density of 1/ha.	Section 19.4 of the ES chapter provides the ALC survey methodology and the survey data is provided in Appendix 19.6.2.	Section 19.4 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]	
1.2	Soil Surveys	There will be significant soil loss across the site, and it is noted that a soil management strategy will be implemented. However, there are no details to review at this stage which will be needed to inform future assessment work	JLAs	The soil management strategy will be developed alongside the Project design and construction methodology and in accordance with recognised best practice measures. (See PEIR 18.4.1; 18.8.1)	A soil management strategy has been produced as part of the ES, in accordance with recognised best practice and is produced as ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy.	ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy [APP-086]	
1.3	Soil Strategy	WSCC wants to see the addition of the following guidance: The Government's Safeguarding our Soils strategy (2009b), and is supported by the Defra Construction Code of Practice on the Sustainable Use of soils on Construction Sites (Defra, 2009a)	JLAs	Reference to these documents to be included within the chapter and any relevant sections/policies highlighted. The DEFRA best practice document for the Sustainable use of Soils on Construction Sites is referenced in the PEIR.	Reference to the Defra Construction Code of Practice on the Sustainable Use of soils on Construction Sites is provided in the methodology Section 19.4 of the Agricultural Land Use and Recreation Chapter and principles from this code are incorporated into the ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy.	Paragraph 19.4.1 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044] ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy [APP-086]	
1.4	Soil Strategy	A key concern is the temporary use of Holding 3 north of the South Terminal Roundabout. Whilst it does not merit a high agricultural score it helps maintain the Gatwick Setting and should be returned to its current use once the site is closed. However, the highway flood alleviation pond will reduce the amount of land available to return to current use. It is unclear if the pond has been taken into consideration. Clarity is sought. We would also require that the land is returned to its current use which maybe 15 years from start of the project."	JLAs	The restoration of the land temporarily used within this holding would be included as part of the soil management strategy for the Project which will be developed alongside the Project design and included as part of the ES.	The assessment of the effects of the Project on Bayhorne Farm (Paragraphs 19.9.5 and 19.9.10 of ES Chapter 19 Agricultural Land Use and Recreation) to the north of South Terminal Roundabout considers both temporary and permanent effects on the land holding. Approximately 1.9ha of land within the holding would be permanently affected due to the highways improvement works and the provision of an attenuation pond. Approximately 2.3ha of land would be temporarily required within the holding and this area would be restored to its former agriculture use, in accordance with the principles provided in ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy.	Para 19.9.12 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044] ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy [APP-086]	

1.5	PRoW	It would be beneficial to have a PRoW strategy document to show how any construction impacts are dealt with appropriately and show how impacts on the public users will be kept to a minimum	JLAs	A PRoW outline strategy document will be provided as part of the ES.	A PRoW management strategy document has been produced as part of the ES at 19.8.1 Public Rights of Way Management Strategy. The strategy describes the approach to managing the impacts on PRoW because of the construction and operation of the Project to reduce disruption to users (as far as possible).	ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]	
1.6	ProW	In addition to the comments provided above with reference to Public Rights of Way and similar concerns on the implications for NCR21, there is potential to enhance the quality of the route and cycling around the airport. Reigate and Banstead along with Surrey County Council are about to endorse a Local Cycling and Walking Infrastructure Plan for the Borough with the intention of encouraging more cycling and walking. Chapter 18 of the PEIR contains very little on enhancing the local cycle network for recreational use and potentially the introduction of a segregated route along the A23 as part of the surface access improvements and introduction of mini-Holland style roundabouts at the South and North Terminal Junctions, along with joining up to cycle routes through the proposed Horley Business Park towards Horley Town centre could boost cycling in the vicinity of the airport, support active travel and reduce car use. The local authorities would be willing to discuss such measures.”	JLAs	The potential effects on and enhancement of the NCR21 need to be considered in the light of emerging highway design and local authority initiatives.	<p>Table 19.8.1 of ES Chapter 19 Agricultural Land Use and Recreation includes the potential for enhancement through the “consideration of improvements to NCR 21 to the south of the Airport”.</p> <p>The PRoW Management Strategy (ES Appendix 19.8.1) identifies that if additional measures are identified to be necessary during the construction of the Project, due to further detailed design, including the consideration of improvements to NCR21 south of the airport, these would be agreed with the relevant LPA and landowners (where relevant) and incorporated into the detailed PRoW implementation plans.</p>	<p>ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]</p> <p>Table 19.8.1 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]</p> <p>Section 19.8 and Paragraphs 19.9.18 to Paragraph 19.9.32 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]</p> <p>Rights of Way and Access Plans – For Approval [APP -018]</p>	
1.7	ProW	WSSCC would expect to see improvements to the local PRoW network as part of these proposals. Particular opportunities include improvement and also possible upgrade of the Sussex Border Path, potentially to Bridleway, offering opportunities to cyclists and walkers particularly, which could tie into the road improvements proposed that	JLAs	This request is noted and will be taken into account in the development of the mitigation measures to be included in the project with reference to PRoW.	Due consideration has been given to the development of the proposed active travel infrastructure improvements as part of the Project. Please refer to the response to items 5.97, 5.99, 5.100 and 5.108 in Table 5 ‘Transport’ responses to JLA comments, which provide a summary of the proposed substantial improvements to active travel infrastructure that form part of the proposals.	<p>Para 4.4.7 of ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]</p> <p>Section 19.8 and Paragraphs 19.9.18 to Paragraph 19.9.32 of ES Chapter 19 Agricultural</p>	

		would improve sustainable transport options for local residents, employees and leisure users. These opportunities may also be possible east of the South Terminal so as to offer sustainable transport options from the airport to Tinsley Green			A PRow management strategy document has been produced as part of the ES at 19.8.1 Public Rights of Way Management Strategy. The strategy describes the approach to managing the impacts on PRow because of the construction and operation of the Project to reduce disruption to users (as far as possible).	Land Use and Recreation [APP-044] Rights of Way and Access Plans – For Approval [APP-018]	
1.8	ProW	We note in particular that Public Footpaths 367, 367Sy and 368 will be disrupted during the initial construction phase of the proposed surface access works with Footpath 367Sy having to be diverted in the vicinity of the proposed Construction Compound to the north of the South Terminal Roundabout. Further details are needed including the proposed route changes, when they would take place, for how long, statutory notification procedures that would be undertaken, the type of surfaces being proposed, the proposed the proposed widths of the altered footpaths, the type of fencing proposed and the safety lines of site.	JLAs	Detailed impacts on Public Footpaths 367, 367Sy and 368 during construction requested which would normally be provided during the detailed design stage.	A PRow management strategy document has been produced as part of the ES at 19.8.1 Public Rights of Way Management Strategy. The strategy describes the approach to managing the impacts on PRow because of the construction and operation of the Project to reduce disruption to users (as far as possible).	Table 4.4.1 of ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]	
1.9	Active Travel	WSSCC wants to see the addition of the following guidance: West Sussex Transport Plan (2011-2026); draft West Sussex Transport Plan (2022-2036); West Sussex Walking and Cycling Strategy (2016-2026); West Sussex Rights of Way Management Plan (2018-2028); Environmental Impact Assessment: Appraising Access (2020) – The Institute of Public Rights of Way & Access Management (IPROW)	JLAs	Reference to these documents to be included within the chapter and any relevant sections/policies highlighted	These guidance documents are included in ES Chapter 19 Agricultural Land Use and Recreation in Table 19.2.2 and Section 19.4.1.	Table 19.2.2 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]	
1.10	ProW	In relation to NCR21, there is potential to enhance the quality of the route and cycling to and around the airport which GAL should consider as part of the NRP to assist in terms of recreation and to in order to achieve the sustainable transport goals. No	JLAs	The potential to enhance the quality of NCR21 and walking/cycling to meet sustainable transport goals to be re-visited. Reference to Crawley’s LCWIP and the latest standards LTN 1/20 to be included in this topic chapter.	Table 19.8.1 of ES Chapter 19 Agricultural Land Use and Recreation includes the potential for enhancement through the “consideration of improvements to NCR 21 to the south of the Airport”	Design Principle DLP12 of Design and Access Statement - Volume 5 [APP-257] Section 19.8 of ES Chapter 19 Agricultural Land Use	

		reference is made to Crawley's LCWIP, which details significant improvements needed to the key cycle and walking route to Gatwick along the alignment of NCR21. GAL should commit to delivering quality improvements to the latest standards LTN 1/20.			<p>The PRow Management Strategy (ES Appendix 19.8.1) identifies that if additional measures are identified to be necessary during the construction of the Project, due to further detailed design, including the consideration of improvements to NCR21 south of the airport, these would be agreed with the relevant LPA and landowners (where relevant) and incorporated into the detailed PRow implementation plans.</p> <p>Due consideration has been given to the guidance set out in LTN 1/20 in the development of the proposed active travel infrastructure improvements. Refer to the response to items 5.97, 5.99, 5.100 and 5.108 in Table 5 'Transport' responses to JLA comments, which provide a summary of the proposed substantial improvements to active travel infrastructure that form part of the scheme.</p>	<p>and Recreation Table 19.8.1 [APP-044] Section 4.3 of ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]</p>
1.11	Public Open Space	<p>Riverside Gardens is a protected open space. We note that there is a proposal to include a pedestrian link between the footway on the northern side of the A23 near the Longbridge Roundabout into Riverside Gardens and another to the east but that the details remain patchy at present and would need further consideration. It appears in Chapter 18 that the surface access works to the M23 spur/A23 would require 0.75 hectares of land being removed permanently from Riverside Gardens. Unfortunately, the details of what land would be needed is not clear from the information provided in Chapter 18 or the associated appendices. This makes the assessment of the PEIR very challenging on this matter. Furthermore, it appears that the trees/vegetation barrier between Riverside Gardens and the A23 would be significantly reduced which would significantly undermine the relative</p>	JLAs	<p>The current design development of the highways scheme indicates that the permanent loss of POS within Riverside Garden Park will be approximately 0.8ha of land and within Church Meadow approximately 0.1ha of land would be affected for the provision of highways attenuation. Further information will be provided on areas of lost POS and provision of new links within the ES to reflect the further development of the highways design.</p>	<p>The Project would lead to the permanent loss of approximately 1.03ha of land within Riverside Garden Park. Replacement areas of approximately 1.43ha of open space would be provided in the areas of Car Park B and the replacement areas would be linked to Riverside Garden Park via a new pedestrian link.</p> <p>The Project would also lead to the permanent loss of approximately 0.13ha of land in Church Meadows. A replacement area of approximately 0.52h of open space would be provided to the west of the Church Meadows, linked to the existing area of open space by a new pedestrian bridge over the River Mole.</p>	<p>Table 19.7.1 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044] provides areas of loss and replacement public open space.</p> <p>Figure 19.8.1 of Agricultural Land Use and Recreation Figures [APP-058] shows the location of the areas of loss and replacement public open space.</p>

		tranquillity of Riverside Gardens and its future attractiveness to users. This does not seem to have been fully addressed in Chapter 18.					
1.12	Surface access facilities	More ambitious proposals to improve other surface access facilities including local and long distance bus and coach services, and walking and cycling links should be included.	CBC	N/A	The surface access improvements for the Project have evolved through the pre-application stage. The Project has been designed to ensure that access to the airport by road, rail and public transport is of high quality, efficient and reliable for passengers, freight operators and airport workers.	Paragraphs 5.2.91 to 5.2.122 of ES Chapter 5: Project Description [APP-030] Section 8.4 of the Planning Statement [APP-245]	
1.13	Walking and cycling infrastructure	The requirements of national policy with regard to assessing and improving walking and cycling infrastructure should be fully addressed.	CBC	N/A	National policy requirements relating to agricultural, land use and recreation effects are fully considered within the DCO Application.	ES Chapter 19: Agricultural Land Use and Recreation [APP-044] Section 8.4 of the Planning Statement [APP-245]	
1.14	Walking and cycling infrastructure	GAL should commit to substantial improvements to walking and cycling infrastructure to LTN1/20 standards.	CBC	N/A	Due consideration has been given to the guidance set out in LTN 1/20 in the development of the proposed active travel infrastructure improvements. Refer to the response to items 5.97, 5.99, 5.100 and 5.108 in Table 5 'Transport' responses to JLA comments, which provide a summary of the proposed substantial improvements to active travel infrastructure that form part of the scheme.	N/A	
1.15	Sustainable transport modes	Detailed improvements to sustainable transport modes should be proposed and evaluated, as part of the justification for the mode share targets. Specific, ambitious mode share targets for public transport, walking and cycling should be separated from those for zero emission vehicles.	CBC	N/A	The proposed surface access improvements are described in detail in the DCO Application. Alongside physical surface access improvements, the Project proposes a series of mode share commitments alongside commitments to interventions that would be implemented to support the achievement of these mode shares.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
1.16	Impacts on recreation during construction	In terms of the proposal's impacts on recreation in general, more detail is needed on the impacts and proposed diversions during the construction phases. In particular, further detail is needed on the access arrangements for the proposed car park on Pentagon Field and how this will affect Footpath 359sy, and the Balcombe Road footpath.	CBC	N/A	A PRoW strategy document is included as part of the ES. The construction of a car park on Pentagon Field has been removed from the Project and is therefore not assessed as part of the ES. Pentagon Field is proposed to be used for the deposition of spoil from excavations within the Project and will then be restored to grassland which can be returned to its former agricultural use. During the works to deposit	ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]	

					spoil, management measures may be required, in accordance with the principles in the PRow strategy, to ensure that access to Footpath 359sy remains throughout the construction period.		
1.17	Footpath network	The Council also considers that the Project offers a significant opportunity to enhance the footpath network to the east /southeast of the airport which is in a poor condition.	CBC	N/A	The Rights of Way and Access Plans illustrate the proposed modifications to footways and footpaths that form part of the scheme. To the east of the airport the proposed improvements include the provision of a new footway link between the existing south terminal Ring Road South footway network and Balcombe Road. These plans also illustrate the extent of a localised diversion of Footpath 367Sy south of M23 Spur which will be delivered to a suitable condition post construction as set out in Section 4 of the Public Rights of Way Management Strategy.	Rights of Way and Access Plans – For Approval Sheet 2 [APP – 018] ES Appendix 19.8.1: Public Rights of Way Management Strategy Section 4. [APP-215]	
1.18	Travel links	The council would also welcome engagement with GAL to assess opportunities for more direct active travel links from Gatwick Station to the proposed Gatwick Green development to the east of Balcombe Road.	CBC	N/A	The active travel strategy includes provision of a new pedestrian link south of the M23 Spur, between Balcombe Road and Ring Road South providing access to the South Terminal and Gatwick Airport Railway Station. Development of active travel links to serve the Gatwick Green development are for the promoter of that scheme to propose in association with any planning application, which would need to be discussed and agreed with GAL and any other relevant landowners that would be affected.	N/A	
1.19	Pentagon Field	CBC object to the loss of Pentagon field and its use as soil deposition area and the negative impact this has on nearby countryside in terms of access and recreation. This element of the Project should be reconsidered or as minimum robustly justified.	CBC	N/A	The land within Pentagon Field would be restored following spoil deposition and returned to its former use for agricultural grazing. No public rights of way are physically impacted by the location of spoil deposition on Pentagon Field. Footpath 359sy runs to the west and north of Pentagon Field and would remain in situ as part of the Project	ES Chapter 19: Agricultural Land Use and Recreation [APP – 044]	
1.20	A23 London Road	Section 5 Highway works (A23 London Road) This section of road has recreational, access, and potentially harmful ecological impacts and CBC	CBC	N/A	The extents of the proposed footway and shared-use path provision on the northern side of A23 London Road are illustrated in Sheet 1 of the Rights of Way and Access	Sheet 1 of the Rights of Way and Access Plans [APP-018]	

		wish to see further detail in this aspect of the proposal to understand how pedestrian/ recreational and cycle routes would be impacted. CBC has concerns about the proposed shared path.			Plans and defined in Schedule 4 Part 3 of the Draft Development Consent Order. The proposed ramp connection between A23 London Road and Riverside Garden Park just east of the A23 London Road bridge over the River Mole was amended to a shared-use ramp provision for both pedestrians and cyclists following feedback from project stakeholders on the design proposals put forward in the Summer 2022 consultation materials through forums such as the Transport Active Travel Topic Working Groups. The provision of footway improvements further south of the ramp as opposed to further shared use path provision was implemented to minimise the footprint of the proposed works and the associated impact on Riverside Garden Park and existing trees to the north.	Schedule 4 Part 3 of the Draft Development Consent Order [AS-004]	
1.21	Brook Farm	Brook Farm – CBC question the purpose of this land being provided for recreational use. As was explained at the meeting the red route on Fig 18.6.4 is a permissive path only and while it was explained that GAL has no plans to close or divert the route its future and the link to the field is not guaranteed. Can GAL consider enhancement to the permissive path – it can get very flooded and overgrown? GAL should also consider how this field is accessed by people from other rights of way. It does not seem like much of a recreational asset as laid out.	CBC	N/A	The area close to Brook Farm comprises an area of approximately 17ha of land that would comprise ecological mitigation and the flood compensation area at Museum Field. The sketch landscape concept for this area is shown on Figure 1.2.1 of Appendix 8.8.1. of the ES. The proposal is that the area would also be available for recreational use. The area can be reached by pedestrians through the proposed new access into the northern part of Museum Field the from the current permissive route along the west bank of the River Mole. The current permissive route along the west side of the River Mole is a typical rural footpath used commonly used by dog walkers. As with other footpaths located on Weald Clay soils in the local area, this path would typically be expected to become muddy through regular use in the winter season.	ES Chapter 19 Agricultural Land Use and Recreation [APP-044] ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan – Part 1 [APP-113]	

1.22	Impact assessment on agriculture land	Need to view and agree impact assessment on agriculture land north of the South Terminal Roundabout (AR10.03)	RBBC	N/A	The land north of South Terminal Roundabout forms part of the Surrey County Council landholding at Bayhorne Farm which is currently tenanted and mainly used as a horse livery facility. The area forms part of the Horley Business Park site. Approximately 1.9ha of land would be permanently lost from on the southern edge of the holding. No farm buildings would be lost and there would no land withing the holding would be severed as a result of the Project.	ES Chapter 19 Agricultural Land Use and Recreation Section 19.6 and 19.9 [APP-044]	
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Table 2: Air Quality

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
2.1	Air quality action plan	The key recommendation is for the applicant to prepare a robust Air Quality Mitigation Plan to mitigate and/or offset the airport and airport traffic-related emissions.	JLAs	GAL will include an Air Quality Action Plan in addition to the mitigation sections in the ES.	<p>As summarised in section 13.13 of ES Chapter 13 Air Quality (APP-091) no significant impacts are predicted and no mitigation is required for the operational phase. Therefore, an Air Quality Action Plan has not been submitted.</p> <p>Best practice measures to support future reductions are included in ES Appendix 5.4.2: Carbon Action Plan and ES Appendix 5.4.1: Surface Access Commitments.</p> <p>The Carbon Action Plan sets out commitments made to mitigate carbon emissions and the Surface Access Commitments details measures to manage airport traffic related emissions, reducing emissions of pollutants.</p>	<p>Section 13.9 of ES Chapter 13: Air Quality [APP-038]</p> <p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	
2.2	Compliance Limit Values	Request for application of the NPS policy Test for Air Quality.	JLAs	An additional discussion section will be added to the ES on assessment against limit values.	The relevant air quality requirements of the ANPS have been taken into account in the assessment.	Table 13.2.2 and Table 13.2.4 of ES Chapter 13: Air Quality [APP-038]	
2.3	Congestion	Consideration should be given to the use of temporal profiles or period data (e.g., peak hour (AM/PM), inter-peak (IP) and off-peak (OP)) within the future assessment for the ES chapter.	JLAs	Period data will be modelled.	Daily variation of flow and congestion has been taken into account by modelling period data from the traffic model (e.g. peak hour (AM/PM), inter-peak (IP) and off-peak (OP)).	Section 13.10 of ES Appendix 13.4.1 Air Quality Assessment Methodology [APP-158]	
2.4	2038 Assessment Scenario	It is acknowledged that predictions for 2038 will be uncertain but this does not justify the absence of a 2038 assessment of road vehicle emissions, which should be provided in the ES.	JLAs	GAL to include a detailed operational assessment of 2038.	An assessment of 2038 has been included in the ES. 2038 was modelled as part of the air quality assessment and has indicated that there are no significant effects as a result of the Project.	Section 13.10 of ES Chapter 13: Air Quality [APP-038]	
2.5	Additional receptors for ES	Additional receptors have been provided by the local authority to be included in the ES assessment.	JLAs	Additional model receptors to be added as requested.	Additional receptors requested by Reigate and Banstead Borough Council were included in the assessment. These include all receptors requested including those specifically noted at the September 2022 TWG for Charlwood (Povey Cross Road) and near to the M23 in the Tandridge DC area.	Section 13.5.13 of ES Chapter 13 Air Quality [APP-091] and ES Appendix 13.6.2 Air Quality Receptors [APP-160]	

2.6	Clapp & Jenkins Approach	Request to provide a comparison of the Defra NOx to NO2 calculator and the Clapp and Jenkin approach.	JLAs	A comparison will be included in the ES.	A sensitivity test was undertaken using the Defra NOx to NO ₂ calculator for comparison against the Clapp and Jenkin approach.	Para 4.4.2 onwards of ES Appendix 13.4.1 Air Quality Assessment Methodology [APP-158]. ES Appendix 13.9.2 Air Quality Sensitivity Tests [APP-168].	
2.7	200m screening of roads	Comment on whether 500m screening should be used for 'major' roads.	JLAs	Best practice methodology following IAQM guidance (200m screening) will be undertaken for the ES.	Sensitive receptors within 200 m of the ARN were assessed. Additional roads within 200 m and up to 500 m (motorways and large A-roads) of sensitive receptors were added into the assessment to account for all relevant emissions. This process was detailed in the November 2022 TWG.	Para 13.5.8 of ES Chapter 13 Air Quality [APP-091].	
2.8	Model verification details	Request statistical parameters including the fractional bias and correlation coefficient are presented.	JLAs	Details will be included in the ES documentation	The verification includes the presentation of statistical parameters including the correlation coefficient, Root Mean Square Error (RMSE) and fractional bias.	Table 3.3.1 of ES Appendix 13.6.1 Air Quality Data and Model Verification [APP-159].	
2.9	2047 assessment scenario	It is acknowledged that predictions for 2047 would be uncertain but this does not justify the absence of a 2047 assessment, which should be provided in the ES.	JLAs	An emissions inventory will be created for 2047.	An assessment of 2047 has been included in the ES with an emissions inventory, including aircraft and road vehicle emissions.	Table 13.10.8 of ES Chapter 13 Air Quality [APP-091].	
2.10	Monitoring	Request for monitoring (e.g. dust, NOx, PM, UFP).	JLAs	Request for monitoring of multiple pollutants in the vicinity of the airport is noted. A draft monitoring proposal has been produced.	GAL will continue to discuss and seek to agree monitoring arrangements with the local authority, including through the SOCG process. Monitoring commitments are intended to be secured under the Section 106 Agreement to be entered in relation to the Project.	Section 13.9 of ES Chapter 13 Air Quality [APP-091].	
2.11	Ultrafine particles (UFPs)	There should be more detailed discussion and qualitative assessment on the potential health impacts of UFPs as a result of the planned development.	JLAs	Additional discussion will be provided in the ES documentation.	UFP has been taken into consideration in the air quality and health assessment.	Para 13.2.5 of ES Chapter 13 Air Quality [APP-091]. Section 18.8 of the ES Chapter 18 Health and Wellbeing [APP-043].	
2.12	Health Impacts	Request for a more detailed/quantitative assessment of the health impacts for the Project	JLAs	A proportional quantitative assessment will be undertaken for the ES.	The assessment of health impacts has been considered in the Health and Wellbeing chapter.	Section 18.8 of the ES Chapter 18 Health and Wellbeing [App-043].	
2.13	Pier 7 APU emissions	The ES needs to examine the impact of Pier 7 APU emissions on the surrounding area allowing for a potential doubling of days above 25C during the summer, to evaluate the potential benefits of	JLAs	Piers will be modelled separately for the ES.	The ES chapter includes the impacts of Pier 7 within the air quality impacts. The ES climate change chapter includes an in-combination climate change impacts assessment.	ES Chapter 15: Climate Change [APP-040]. Pier 7 results are provided within the detailed breakdown of results	

		preconditioned air being installed at this pier when it is constructed				provided to the TWG via email 18 th August 2023.	
2.14	Uncertainty in emissions over time	It is unclear from the PEIR what if any assumptions have been made to account for the uncertainty in improvement of emissions over time.	JLAs	Defra's projected background concentrations and Emissions Factors Toolkit (v11) emissions for the year of each assessment will be used.	The air quality assessment has been based on latest available tools by Defra. The EFT v11 developed by Defra has recently been updated to account for more realistic future emission rates. Throughout the assessment reasonable worst-case assumptions have been made to address the uncertainties providing a robust, conservative approach.	Para 13.7.16 of ES Chapter 13 Air Quality [APP-091].	
2.15	Sussex Air Guidance	The Applicant should demonstrate regard given to the Sussex Air Partnership's Air Quality and Emissions Mitigation Guidance for Sussex (2021) in assessing air quality impacts and deriving necessary mitigation measures as well as the Defra 'Air quality damage cost guidance'.	JLAs	We are proceeding with the national Transport Analysis Guidance (TAG) assessment methodology which will provide for an overall assessment of costs and benefits across the Project.	The socio-economic effects ES chapter considers the costs associated with air pollution to the economy. Table 13.4.1 of ES Chapter 13 Air Quality (APP-091) considers the Sussex Guidance.	ES Chapter 17: Socio-economic Effects [APP-042] and Table 13.4.1 of ES Chapter 13 Air Quality [APP-091].	
2.16	Habitats regulations assessment (HRA)	For the ES it will be important to understand that a true 'in combination' assessment has been undertaken (i.e. considering the effect of the Scheme in combination with traffic growth due to housing and employment delivery in the modelled area between base year and assessment year).	JLAs	Updated HRA assessment to be included in the ES.	The HRA submitted as part of the Application considers the assessment of cumulative effects, including the consideration of the Project with traffic growth due to local plans.	ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 and 2 [APP-134 & APP-135]. ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045].	
2.17	Ammonia	Ammonia emissions from road traffic should be included in the ES using the most appropriate methodology available at the time.	JLAs	A proportionate assessment of ammonia will be undertaken with guidance from Natural England and ecology specialists.	An assessment of ammonia has been added to the ecological assessment and considers the nitrogen deposition contribution from road vehicle ammonia emissions at designated ecological sites assessed.	Section 13.5 of ES Chapter 13: Air Quality [APP-091].	
2.18	Additional ecology results	It would seem that nitrogen deposition has not been calculated where NOx concentrations do not exceed 30µg/m3, apart from the four sites in the HRA. It is recommended that nitrogen deposition is calculated even when NOx is below 30µg/m3, as it could still make a significant contribution	JLAs	Nitrogen deposition will be calculated for all designated ecological sites.	An assessment of nitrogen deposition has been undertaken for comparison against the relevant critical load for each ecological site assessed.	ES Appendix 9.9.1 Habitats Regulation Assessment [APP-134 & APP-135]. Section 13.5 of ES Chapter 13 Air Quality [APP-091].	

		to N deposition even if NOx does not exceed the Critical Level.					
2.19	Source apportionment	Source apportionment needs to be done on model receptor points [in] particular those in Horley AQMA. Is this something Arup will do for the ES? Important to do this to separate Aviation emissions from traffic	JLAs	Source apportionment (split by airport and non-airport sources) for each receptor will be undertaken and presented in the ES.	The ES has included a source apportionment of predicted pollutant emissions for the main sources, such as aircraft in the air, aircraft on ground, airport activities, car parks, airport related and non-airport related road traffic.	<p>ES Appendix 13.9.1: Air Quality Results Tables and Figures P1-2 and P4-6 [APP-162, APP-163, APP-165 & APP-166].</p> <p>Modelled results by source were shared with the TWG via email 18th August 2023.</p>	
2.20	Air Quality	Provision in an electronic format of the detailed air quality model verification data - GAL shared the overall findings of the model verification exercise on 11th Nov 2022 but in the absence of the detailed data in an electronic format the local authorities are unable to check the results for themselves. This is particularly important given the issues with air quality model at the PEIR stage of the process and the limited time available after the DCO submission – necessary to spend time now on checking the model’s performance in the first instance rather than focusing solely on the model outputs for the future.	JLAs	<p>The detailed air quality model verification data is contained in ES Appendix 13.6.1: Air Quality Data and Model Verification, and is available to view on PINS website.</p> <p>It should be noted the model used at the PEIR stage was appropriate and fit for purpose, the ‘issues’ noted would not change the conclusion of no significant impacts. The requested technical amendments and additional receptor points to be assessed in the Environmental Statement have all been taken into account as discussed in detail and agreed with the LAs and their technical advisors (AECOM) though the TWG process. Details on how these recommendations and clarifications have been considered in the ES are also reported in ES Chapter 13 on Air Quality (Doc Ref. 5.1) [APP-038].</p> <p>For the DCO Application, details of the air quality assessment methodology are included in ES Appendix 13.4.1: Air Quality Assessment Methodology (Doc Ref. 5.3) [APP-158] and details of the model verification process and results are provided in ES Appendix 13.6.1: Air Quality Data and Model Verification (Doc Ref. 5.3) [APP-159]. The full suite of the air quality results is contained six parts across APP-162 to APP-167. The detail provided within the Environmental Statement is sufficient to demonstrate the method and analysis undertaken to reach the conclusions of significance.</p>	N/A	<p>ES Chapter 13: Air Quality [APP-038]</p> <p>ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]</p> <p>ES Appendix 13.6.1: Air Quality Data and Model Verification [APP-159]</p> <p>ES Appendix 13.9.1: Air Quality Results Tables and Figures - Parts 1 to 6 [APP-162 to APP-167]</p>	
2.21	Signposting Issues Tracker	Signposting in the Issue Trackers produced by GAL inaccurate in places (Tracker 1 - Monitoring and Health Impacts Section 3.10 of ES Chapter 13)	CBC, MSDC	N/A	GAL has had subsequent correspondence with CBC on this matter, which clarification sent back to CBC on 7 th September.	N/A	

2.22	Air Quality modelling	Request for re-run of Air quality modelling following updates to traffic models	CBC, MSDC	N/A	GAL will review and consider the need for any further assessment resulting from any updates made to the traffic model.	N/A	
2.23	Sensitivity testing	Request for sensitivity testing in light of WHO's recent guidance on reducing annual average nitrogen dioxide concentrations.	CBC, MSDC	N/A	The air quality assessment has been carried out following national best practice and is in line with national policy and legislation as required by the ANPS.	Table 13.2.2 of ES Chapter 13: Air Quality [APP-091].	
2.24	Solid-state sensors	Concerns around the use of solid-state sensors e.g. AQ mesh for long term on airport monitoring, which are not approved for use on the national network, remain.	CBC, MSDC	N/A	GAL will continue to discuss and agree monitoring arrangements with the local authority, including through the SOCG process.	Section 13.9.7 and 13.9.8 of ES Chapter 13 Air Quality [APP-091].	
2.25	Air Quality Mitigation Plan	Robust Air Quality Mitigation Plan required to offset emissions. Detailed content should be agreed, such as cost of proposed measures, indicative emissions reduction likely to be achieved particularly for operational phase.	HDC	N/A	See response provided to Row 2.1 above.	Section 13.9 of ES Chapter 13: Air Quality [APP-038]. ES Appendix 5.4.2: Carbon Action Plan [APP-091]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
2.26	Air Quality Assessment Methodology	Previously agreed 500m screening from arterial roads. It is unclear what methodology was used in the ES as no details were given in Appendix 13.4.1: Air Quality Assessment Methodology.	HDC	N/A	Sensitive receptors within 200 m of the ARN were assessed. Additional roads within 200 m and up to 500 m (motorways and large A-roads) of sensitive receptors were added into the assessment to account for all relevant emissions. This process was detailed in the November 2022 TWG.	Para 13.5.8 of ES Chapter 13 Air Quality [APP-091]	
2.27	Air Quality modelling	Acknowledge that predictions for 2047 would be uncertain but this is not justification for no 2047 assessment having taken place. This should be provided in the ES. If this is to exclude road traffic then a 2038 scenario, excluding road traffic, should also be modelled to allow the change in airport concentrations to be examined.	HDC	N/A	An assessment of 2047 has been included in the ES with an emissions inventory, including aircraft and road vehicle emissions.	Table 13.10.8 of ES Chapter 13 Air Quality [APP-091]	
2.28	Air Quality Monitoring	Request for monitoring (i.e. dust, NOx, PM, UFP). No clarification yet on what monitoring is planned. Unclear if high risk areas have been identified for dust during construction phase. No commitment to install monitoring in event of complaints from residents	HDC	N/A	GAL will continue to discuss and agree monitoring arrangements with the local authority including through the SOCG process. Monitoring commitments are intended to be secured under the Section 106 Agreement to be entered in relation to the Project.	Section 13.9 of ES Chapter 13 Air Quality [APP-091]	

		re: dust. On airport monitoring is welcome but should not be at expense of off-airport monitoring using improved techniques and located at relevant receptors. Concerns over use of solid state sensors for long term airport monitoring, which are not approved for use on the national network, remain.					
2.29	Potential Health Impacts	Further information required on the assessment of potential health impacts of UFPs as a result of NRP.	HDC	N/A	A qualitative assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in the ES health and wellbeing chapter. That assessment considers the emerging scientific understanding of UFPs as a public health issue. The approach follows IEMA 2022 guidance on assessing human health effects in EIA.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] "Health and wellbeing effects from changes to air quality" paragraphs 18.8.67 to 18.8.86.	
2.30	Transport Analysis Guidance (TAG)	Local authorities have agreed for the road traffic element of the Transport Analysis Guidance (TAG) damage cost approach for calculating damage cost (rather than Sussex Air Guidance), but damage cost has not been provided.	HDC	N/A	The socio-economic effects ES chapter considers the costs associated with air pollution to the economy.	ES Chapter 17: Socio-economic Effects [APP-042] and Table 13.4.1 of ES Chapter 13 Air Quality [APP-091] considers the Sussex Guidance.	
2.31	HRA	No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to the HRA.	HDC	N/A	Agreement has been reached with Natural England on the method used and details will be provided in the SoCG with Natural England.	N/A	
2.32	Assessment of ammonia emissions	No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to assessment of ammonia emissions.	HDC	N/A	Agreement has been reached with Natural England on the method used and details will be provided in the SoCG with Natural England.	N/A	
2.33	Nitrogen deposition	No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to nitrogen deposition calculations where concentrations do not exceed 30µg/m3.	HDC	N/A	Agreement has been reached with Natural England on the method used and details will be provided in the SoCG with Natural England.	N/A	
2.34	Model receptor points	While source apportionment (airport and non-airport) on model receptor points has been agreed in principle, GAL have yet to confirm that this is to be done for receptors	HDC	N/A	Additional receptors requested by Reigate and Banstead Borough Council were included in the assessment. These include all receptors requested include those specifically noted at the September 2022 TWG for Charlwood	Section 13.5.13 of ES Chapter 13 Air Quality [APP-091].	

		provided by local authorities which were missed at PEIR stage but agreed on 28/8/19.			(Povey Cross Road) and near to the M23 in the Tandridge DC area.	ES Appendix 13.6.2 Air Quality Receptors [APP-160].	
2.35	Airport Emissions Metric	Agreed on metric for airport emissions performance but local authorities have not yet seen any of the results, despite being assured this would be included in the PEIR.	HDC	N/A	Model files and results were provided to the TWG via email 18 th August 2023.	N/A	
2.36	Model verification	Regarding model verification, Appendix 13.6.1: Air Quality Data and Model verification is missing details on how model verification factors were established – information required on Monitored Road NO _x Contribution versus Unverified Modelled Road NO _x , which monitoring sites were used, and which were removed from the verification process.	HDC	N/A	Full details of the verification process and sites which were removed are provided in the ES Appendix.	ES Appendix 13.6.1 Air quality Data and Model Verification [APP-159], Table 3.2.2 provides a list of all sites excluded along with justification.	
2.37	AQ Levels	General concerns remain around how AQ levels have been assessed and will be monitored, how and what mitigation will be funded, and the general impacts on communities. More detail is needed and the Council will continue to raise necessary issues and engage throughout the examination process.	MVDC	N/A	Full details on the assessment process and results are provided in the ES.	ES Chapter 13 Air Quality [APP-091].	
2.38	2047 assessment	It is stated that Chapter 12: Traffic & Transport also includes an assessment for 2047. However, air quality is expected to improve in the future and current tools include predictions only up to 2030. It is acknowledged that predictions for 2047 would be uncertain but this does not justify the absence of a 2047 assessment, which should be provided in the ES	WSSC	N/A	An assessment of 2047 has been included in the ES with an emissions inventory, including aircraft and road vehicle emissions.	Table 13.10.8 of ES Chapter 13 Air Quality [APP-091].	
2.39	Construction and operation	The Air Quality reporting indicates that there are no significant impacts for construction and operation elements on human receptors and ecological receptors in the forecast years of 2024 (Construction	WSSC	N/A	An assessment of 2038 has been included in the ES. 2038 was modelled as part of the air quality assessment and has indicated that there are no significant effects as a result of the Project.	Section 13.10 of ES Chapter 13: Air Quality [APP-038].	

		phase), 2029 and 2032. It is acknowledged that predictions for 2038 will be uncertain but this does not justify the absence of a 2038 assessment of road vehicle emissions, which should be provided in the ES.					
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Table 3: Socio-Economics and Economics

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
3.1	Study Areas	The study areas for the PEIR (Chapter 16) and that used in the Economic Impact Report (Oxera, 2021) are different, making direct comparison across the two documents impossible.	JLAs	Evidence will be presented for both the Labour Market Area (LMA) and the Five Authorities Area across the ES Chapter and the Economic Impact Report to enhance consistency across the evidence.	Since PEIR, the economic impact assessment has been split into two parts – local and national. The Local Economic Impact assessment is appended to the Environmental Statement. The spatial areas in that appendix are consistent with those in the main ES chapter. These include the Gatwick Diamond. The largest spatial scale is now a six local authorities area (West Sussex, East Sussex, Surrey, Kent, Croydon, Brighton and Hove)	Explanations are given in paragraphs 17.4.10 and 17.4.11 of ES Chapter 17 Socio-Economic (APP-042) and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.2	Study Areas	Clarity should be provided as to why the Local Study Area does not align more closely with the Northern West Sussex FEMA.	JLAs	The Northern West Sussex FEMA is defined in terms of a combination of labour markets, housing markets, commercial property markets and consumer catchments, using published data (e.g. 2011 Census) and other sources. For the purposes of assessing the specific impacts of the NRP, particularly in terms of labour market, the PEIR assessment considered more detailed travel-to-work data for Gatwick’s passholders, which we consider comprises a more relevant baseline position compared to the ONS Census 2011 commuting data which relates to all resident workers and workplace jobs. The Local Study Area is used principally for assessing other types of effects, such as resident and business disruption. In any event, the FEMA geography is included within all study areas (except the local study area), and the ES will include a more granular analysis at the LPA level.	N/A	Paragraph 7.4.11 of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.3	Study Areas	The extent of the Local Study Area will be reviewed to address comments that the boundary has not included areas which are in close proximity to the airport. The findings of this review and any subsequent amendments to the boundary should be agreed with the local authorities in advance.	JLAs	The extent of the LSA will be reviewed to ensure that all neighbouring communities around the Airport are included as appropriate. Further work is being undertaken and the findings will inform the ES assessment and be shared at future TWGs as appropriate.	See response to 3.109 below.	Paragraph 7.4.11 of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	

3.4	Additional information on construction employment	Issues have been raised regarding the scale of impacts of the construction workforce in housing and local infrastructure during the construction phase.	JLAs	More detailed analysis of the construction employment expected to be generated will be provided to include quantum, skills and origin/commuting data to inform the assessment (subject to data availability). Further work is currently undertaken and the findings will inform the ES assessment and be shared at future TWGs as appropriate.	See response to 3.104 below.	Section 17.9 of ES Chapter 17 Socio-Economic [APP-042] with a more detailed analysis of the construction employment provided in ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note [APP-199] and the potential housing effects are analysed in ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].
3.5	Impacts on the labour market	GAL to clarify precisely what adverse labour market issues it is expecting, in terms of nature and scale.	JLAs	We are currently undertaking further analysis, and the findings will inform the ES assessment and be shared at future TWGs as appropriate. At this stage, there is no further information that can be provided. Any significant adverse effect will be subject to mitigation measures, and in particular, those in relation to labour supply will be primarily the focal point of the emerging ESBS.	Please refer to the ES assessment for details.	Para 17.9.5 onwards of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].
3.6	Supporting Information (Economic Strategies and Policies)	Various Studies provided by LPAs.	JLAs	Noted. These will be reviewed and included within the analysis as appropriate.	Table 17.2.3 of ES Chapter 17 Socio-Economic (APP-042) sets out the other local authority economic strategies considered.	Table 17.2.3 of ES Chapter 17 Socio-Economic [APP-042].
3.7	Sensitivity & Magnitude	The significance of the effect upon socio-economics has been determined by taking into account the sensitivity of the receptor and the magnitude of the impact. Where a range of significance levels is present, the final assessment for each effect is based upon professional judgement. Clarification could be provided as to the justification for undertaking qualitative and quantitative assessments.	JLAs	For the ES Chapter sensitivity and magnitude will be defined in more detail using quantitative thresholds (as appropriate).	Section 17.4 of ES Chapter 17 Socio-Economic (APP-042) sets out in detail the updated approach adopted in the ES in relation to defining magnitude and sensitivity.	Section 17.4 of ES Chapter 17 Socio-Economic [APP-042].
3.8	Impact on Land Values	The effect of the development on property values on residential and commercial properties outside the Project area has not been scoped due to no change to flightpaths. However, there is the potential for properties to be impacted from the intensification of flights on existing flightpaths.	JLAs	Impacts on residential property values have not been included in scoping for other comparable DCO projects (e.g. Heathrow, Manston, Luton). However, GAL is commissioning a study that will investigate the potential impacts on residential property values to inform the ES assessment.	GAL has not included a specific assessment of effects on property prices in the ES for the reasons set out in Table 17.4.2 of ES Chapter 17 Socio-Economic (APP-042).	Table 17.4.2 of ES Chapter 17 Socio-Economic [APP-042].

3.9	Baseline	The data does not take the pandemic and the effects of unemployment rates into account which may have been influenced by the Government's furlough scheme. The implications of this are only just emerging and potentially will not be understood for years to come.	JLAs	The approach adopted considers that a pre-pandemic position is the appropriate and more representative baseline of socio-economic conditions in the longer-term as opposed to the use of specific data points associated with the period of the Covid-19 pandemic when there was significant disruption to the economy and labour market. The Covid-19 pandemic is expected to have a limited influence on the Project as the effects of the pandemic are expected to have fully subsided by 2029 (the Project's 'opening year'). A variety of econometric forecasts and scenarios (including lower growth) will be assessed in the ES to justify this position.	Please refer to the ES assessment for details.	Table 17.3.2 of ES Chapter 17 Socio-Economic [APP-042] and Section 4.5 of ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.10	Cumulative schemes/Zone of influence	List of permissions does not accurately reflect the development coming forward, specifically in Tandridge. It is recommended that GAL ask neighbouring authorities to submit the planning permissions they are aware of in their respective areas that would have a cumulative effect on development within the vicinity of the airport.	JLAs	Further consideration will be given at the ES stage.	Please refer to the ES assessment for details.	Table 17.11.1 of ES Chapter 17 Socio-Economic [APP-042].	
3.11	Housing Market Area	For Crawley/Horsham/Mid Sussex, our HMA is very similar in geographic extent to that of the NWS FEMA, so we are confused why GAL is using the HMA in one instance, but not the NWS FEMA in another.	JLAs	The general approach is to use the most relevant study area to the particular type of impact being assessed. The Population and Housing Report (PHR) is concerned with housing market effects, and therefore the geographies used relate to housing market areas. Housing market areas broadly represent the geographical areas/extents to which people move when searching for housing, taking into account factors such as house prices, commuting, school catchments, etc. Because Gatwick Airport is located within the North West Sussex HMA, the PHR presents outputs for this area. However, recognising that Gatwick Airport is a regional employer and is likely to influence the labour and housing markets beyond NWS, the PHR also assesses surrounding HMAs which form the majority of Gatwick's labour catchment.	Please refer to the ES assessment for details.	Para 17.3.13 of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.12	Affordable housing	GAL should be looking at the affordable housing element as part of their methodology. Whilst GAL's approach to include additional analysis on the profiles of NRP workers and the type/tenure of housing they are likely to require is welcomed, more work will be	JLAs	As part of additional tasks during Phase 2, Lichfields proposes additional analysis to assess the potential implications for the types and tenures of housing needed. This will include a review of the breakdown of jobs created as part of the project, understanding what types of housing are likely to be associated with those workers, and how this compares with likely	This analysis has been completed and is included within the Assessment of Population and Housing Effects.	Para 17.9.68 of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	

		needed to address affordability for new workers.		delivery (based on trend data, SHMA evidence, local plan housing mix policies, etc) to identify any potential gaps.			
3.13	Future Housing Delivery/Methodology clarification	Concerns were raised about GAL's failure to consider future housing growth as a result of the proposed employment growth. It is noted that Slide 12 confirms that GAL will provide contextual analysis which compares recent housing delivery levels with the future growth set out in housing trajectories.	JLAs	Lichfields will undertake a comparison of recent delivery levels to housing trajectories to understand any potential differences and potential impacts on the labour supply analysis. In terms of employment, Lichfields will review employment targets within adopted or emerging plans where available and compare these with the scale of growth forecast by Cambridge Econometrics. These will be reflected in the report commentary, as well as scenarios and outputs if we consider this is required. Lichfields will also review major employment generating initiatives and assess whether it is appropriate to add any of these initiatives into the forecast, and update the labour supply analysis accordingly.	This comparison has been completed and is included within the Assessment of Population and Housing Effects.	Appendix ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.14	Time Period	The end date in the PHR stops at 2038, compared with 2037 in some other studies e.g. transport.	JLAs	We will extend all scenarios to 2047 in the updated report.	The Assessment of Population and Housing Effects now includes 2047.	Para 17.1.6 of ES Chapter 17 Socio-Economic [APP-042].	
3.15	Experian forecasts	Experian forecasts are used by a number of authorities in the study area to underpin local plans and would act as a sense-check to the Cambridge Econometrics forecasts.	JLAs	We will include scenarios which assess Experian employment forecasts, including their potential impacts on labour supply, in the updated report.	This analysis has been completed and is included within the Assessment of Population and Housing Effects.	Para 17.4.16 ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.16	Plan employment targets and initiatives	The PHR did not look at local job targets from individual local plans, nor did it take account of specific plan-led strategic employment initiatives, such as new business areas, which might generate additional employment growth beyond a baseline forecast.	JLAs	We will review employment initiatives to assess whether it is appropriate to add any of these initiatives into the forecast and update the labour supply analysis accordingly.	An analysis of employment levels underpinning local plans has been included in the Assessment of Population and Housing Effects.	Para 17.6.98 of ES Chapter 17 Socio-Economic [APP-042] ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.17	Recent housing delivery	The PHR does not assess a future housing scenario which is based on past trends in delivery (e.g., over 7-10 years).	JLAs	We will provide contextual analysis which compares recent delivery levels with the future growth set out in housing trajectories.	Analysis of past trends in housing delivery is included within the Assessment of Population and Housing Effects, including justification for why this was not taken forward as a scenario for testing.	Para 17.6.118 onwards of ES Chapter 17 Socio-Economic [APP-042] ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	

3.18	Water neutrality	Water neutrality may impact upon the quantum of housing delivery seen in some authorities, which could have implications for the PHR and its findings.	JLAs	We will generate alternative housing trajectories and further 'stress testing' of the labour supply impacts to understand whether a labour surplus would still be expected within the study area, even if delivery rates fall as a result of water neutrality issues, although it is understood the water neutrality issues will impact more in the shorter term.	Analysis of the potential impact of water neutrality on housing trajectories is included in the Assessment of Population and Housing Effects, including justification for why – on the basis of this analysis - this was not taken forward within the scenario modelling.	Para 4.3.8 onwards of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.19	Type/tenure of housing needed	The PHR only considers the overall quantum of housing and its labour market impacts, not the impact the NRP may have on the type/tenure of housing required.	JLAs	We will include additional analysis which profiles NRP workers and assesses the types of housing they are likely to require. We will also undertake supply analysis to understand whether this reflects likely need.	This analysis has been completed and is found within the Assessment of Population and Housing Effects.	Section 7 of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.20	Temporary accommodation	The PHR does not assess the potential impact that temporary construction workers might have on housing need, specifically the need for short-term temporary accommodation.	JLAs	We will include an assessment of the potential need for temporary accommodation, including a review of the impacts of temporary construction workers on similar scale DCOs.	This analysis has been completed and is found within the Assessment of Population and Housing Effects.	Section 6 of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.21	Land Supply	No information has yet been published on land supply implications associated with the identified growth.	JLAs	The ARELS work is ongoing. The study is assessing land supply implications associated with identified growth – consideration is being given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration is being given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS is assessing total quantum of future airport-related space. The ARELS will not assess suitability or deliverability of the land identified by local authorities – i.e., where space should be located.	The ARELS work has been completed. The study has assessed land supply implications associated with identified growth – consideration has been given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration has been given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS has assessed the total quantum of future airport-related space. GAL would be happy to discuss the ARELS work with the authorities; however, it should be noted that the ARELS has not assessed suitability or deliverability of the land identified by local authorities (i.e. where space should be located). Growth as a result of the NRP will emerge over a long period of time and will to a large extent be indistinguishable from background changes in land use patterns. Businesses serving the airport or its supply chains, or those that use it as passengers will have the opportunity to grow and some of that will mean they need to expand. How and where they do that will be a matter for them and their ability to either find premises or get planning consents to accommodate that growth. It would be spurious to seek to estimate with any precision how space	N/A	

					should be provided and where it should be located.		
3.22	Employment Allocations and Initiatives	Information on additional employment allocations and initiatives has been provided by various LPAs	JLAs	The proposed and existing employment sites are noted. The ARELS is assessing land supply implications associated with identified growth – consideration is being given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration is being given to LPA’s assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS is assessing total quantum of future airport-related space. The ARELS will not assess suitability or deliverability of the land identified by local authorities – i.e., where space should be located.	The proposed and existing employment sites are noted. The ARELS work has been completed. The study has assessed land supply implications associated with identified growth – consideration has been given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration has been given to LPA’s assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS has assessed the total quantum of future airport-related space. GAL would be happy to discuss the ARELS work with the authorities; however, it should be noted that the ARELS has not assessed suitability or deliverability of the land identified by local authorities (i.e. where space should be located). Growth as a result of the NRP will emerge over a long period of time and will to a large extent be indistinguishable from background changes in land use patterns. Businesses serving the airport or its supply chains, or those that use it as passengers will have the opportunity to grow and some of that will mean they need to expand. How and where they do that will be a matter for them and their ability to either find premises or get planning consents to accommodate that growth. It would be spurious to seek to estimate with any precision how space should be provided and where it should be located.	N/A	
3.23	Catalytic impacts	Saying that the methodology for catalytic impacts or net impacts will be explained in the EIA is not consistent with engagement expectations which should be seeking to agree methodologies up front.	JLAs	Oxera is in the process of adjusting its methodology for estimating local impacts to account for induced impacts, which will affect the methodology for calculating catalytic and net impacts. An update on the local impacts methodology will be shared before it is finalised.	Oxera has adjusted its methodology for estimating local impacts to account for the potential overlaps with induced impacts. The updated methodology was presented and discussed in the context of TWG#4, TWG#5 and TWG#7 (summer 2023). The updated catalytic methodology was also discussed in detail in a note that has been issued to the local authorities.	ES Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment [APP-200].	

3.24	Air fare savings and displacement	The following points need to be addressed: The contradiction between including competitive airfare savings benefits in circumstances where no increase in capacity at other airports has been assumed; The elasticities used in relation to air fare savings; The consequences of any displacement to other airports	JLAs	These matters are being considered in air traffic forecasting work and will be discussed as part of the update to the Economic Assessment.	The close proximity and substitutability of Gatwick Airport with other London airports mean that air fare savings are likely to extend to all passengers in the London aviation market. Air fare savings estimated in the context of the National Economic Impact Assessment take into account existing capacity constraints in line with the assessment's traffic forecasts by estimating the 'shadow costs' (or congestion premium) in air fare generated by these constraints. The analysis also accounts for displacement assumed in the assessment's traffic forecasts as it focuses on the additional passenger traffic at a London-level that would be generated by the Project.	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].	
3.25	Trade/FDI	Further clarification on the approach to setting out projected benefits for trade, FDI and the visitor economy are requested	JLAs	Oxera is in the process of establishing a methodology to be used for estimating these impacts and intend to share the methodology before it is finalised.	Oxera discussed its approach to tourism, trade, and FDI in the context of TWG#4 and TWG#7 (Summer 2023). On the visitor economy, a qualitative assessment of the impact of the Project on the local tourism sector was provided in the Economic Impact Assessment. Trade impacts were quantified but excluded from the NPV estimate on the National Economic Impact Assessment to avoid double-counting issues with other quantified impacts. FDI impacts were not quantified given these benefits are usually realised through the same channels as trade and quantifying FDI impacts would likely result in double-counting.	Needs Case Appendix 1 – National Economic Impact Assessment [APP-251]; ES Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment [APP-200].	
3.26	Trade/FDI	GAL has suggested a narrative rather than quantitative approach would be taken. There have previously been economic impact assessments, so it would be helpful to clarify if these approaches will be used or if a different approach will be adopted and why e.g. Gatwick's economic contribution through trade and investment (gatwickairport.com)	JLAs	Oxera is still considering the methodology to be used for estimating these impacts and may provide a quantitative assessment as an illustrative outcome. However, there are no agreed approaches to quantify this potential benefit robustly in the context of a cost-benefit analysis (i.e. without double counting impacts). See for example DfT (2017), Updated Appraisal Report Airport Capacity in the South East, p. 28.	The methodology used to quantify trade impact follows the methodology set out in the Airports Commission Wider Economic Impacts Assessment report which looks at the geographic distribution of additional business passengers generated as a result of the Project as an indicator of the extent to which the capacity expansion could have an impact on trade.	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].	
3.27	Tourism	Analysis of the tourism impacts of the proposed scheme is entirely absent. Once quantified, tourism impacts are likely to be highly negative due to Gatwick's status as an airport predominantly serving UK residents and facilitating overseas spending via international tourism.	JLAs	Any positive and negative impacts on spending with increased inbound and outbound tourism reflects a financial impact of tourism. EIA, however, quantifies the welfare impacts of the Project. EIA will describe the impact of tourism on UK welfare in more detail.	The mechanisms through which the Project would affect welfare via tourism flows are discussed in more detail in the ES Needs Case Appendix 1 - National Economic Impact Assessment.	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].	

3.28	User impacts	It appears that the analysis is based on a 'system-wide' average fare in different market segments. The average fare is, however, likely to be significantly different at the various London airports, reflecting the different market circumstances at each airport. This would suggest that the location of the release of capacity is likely to influence the impact on fare to some degree. It is unclear the extent to which this issue has been considered.	JLAs	Oxera will provide further clarifications on the calculation behind the Project's price impact	Oxera provided additional information on the calculations behind the Project's price impact in the National Economic Impact Assessment. Additionally, the Oxera analysis uses as input average London-wide fares disaggregated by haul and passenger type. To the extent that a degree of competition exists between London airports (despite airport-specific circumstances), this would result in fares by haul and passenger type across London airports to converge around a central average.	Needs Case Appendix 1 – National Economic Impact Assessment [APP-251].	
3.29	Traffic forecasts	Our issue is the fundamental assumptions that feed into the analysis, notably the speed of traffic recovery and growth, and the assumptions as regards capacity development at other airports. If these change, the overall results of the economic appraisal could be quite different.	JLAs	The EIA uses air traffic forecasts as an input to its analysis. The update to the EIA will consider sensitivities based on alternative traffic forecasts assuming slower growth and slower fleet transition at Gatwick.	Please refer to ES Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200) for details.	ES Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment [APP-200].	
3.30	COVID/Brexit	The data does not take the pandemic and the effects of unemployment rates into account which may have been influenced by the Government's furlough scheme. The implications of this are only just emerging and potentially will not be understood for years to come.	JLAs	The EIA uses air traffic forecasts as an input to its analysis. The update to the EIA will consider sensitivities based on alternative traffic forecasts assuming slower growth and slower fleet transition at Gatwick.	By the time the Project is assumed to be operational in 2029, GAL expects that the pandemic will no longer have an impact on the UK aviation sector as a whole, and Gatwick in particular. As a result, the analysis is based on the assumption that the COVID-19 pandemic will not have an influence on passenger traffic related to the Project in the long run. Although the pandemic (or Brexit) may not have a lasting impact on air traffic, it could have long-term impacts on the economy and on employment. These long-term economic effects are taken into account in the Local Economic Impact assessment by using up-to-date baseline data forecasts from TAG and the ONS. Use is also made of updated estimates for total local employment within the study area from Cambridge Econometrics, which reflect the long-term effect of the pandemic on employment.	Table 17.3.2 of ES Chapter 17 Socio-Economic [APP-042].	
3.31	Study areas	The supporting Economic Impact Assessment bases its analysis on different study areas to those within the PEIR. The PEIR uses the Local Study Area and the Labour Market Area whereas the Economic Impact Assessment uses the Gatwick Diamond. This should be consistent throughout all of the consultation documents.	JLAs	For the ES, the EIA will align with other socio-economic workstreams and report economic impacts at the level of the Labour Market Area for consistency	Please refer to paras 17.4.10 and 17.4.11 of ES Chapter 17: Socio-Economic (APP-042) for details.	Paras 17.4.10 and 17.4.11 of ES Chapter 17: Socio-Economic [APP-042].	

3.32	Induced impacts	There appears to be no consideration of induced effects within the economic footprint. This is slightly unusual and might suggest that job impacts are understated but the multipliers used are relatively high and some may include induced effects.	JLAs	Oxera is considering how local induced effect estimates can be provided, but will also qualitatively highlight the methodological challenges with accurately estimating these impacts	Oxera discussed its proposed methodology to assess induced impacts in the context of TWG#4 and reported induced impacts estimates in ES Appendix 17.9.3. Input-output modelling (indirect and now induced) has been revised to adjust multipliers which are reported.	Section 3 of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.33	Quality of employment generated	Account should be taken of the type and quality of employment being generated at the airport and how this translates into the need for different types of housing in the LSA, particularly Crawley. If a large proportion of employment being created is unskilled / semi-skilled then this can generate an increased need for more affordable housing or different housing tenures. Many of the jobs directly linked to the project appear to be lower paid / entry level.	JLAs	Oxera will consider whether further information on the type of employment generated can be provided taking into account the uncertainties around the duration of employment that is not located on-site at the airport.	Please refer to Section 7 of ES Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201) for details.	Section 7 of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.34	Net impacts	Whilst the methodology used to assess additionality seems roughly adequate and this scale of net additional employment is not unreasonable, it is likely to be on the upper end of the estimate. Further clarity on how this methodology was applied would be required.	JLAs	We will provide additional information as to the net impacts methodology	The updated methodology on catalytic and net impacts was presented and discussed in the context of TWG#4, TWG#5 and TWG#7 (summer 2023). The updated methodology was also discussed in detail in a note that has been issued to the local authorities.	Section 3 of ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.35	Scope of the Outline Employment, Skills and Business Strategy (OESBS)	It is noted that the consultation document is an outline strategy, and a more comprehensive Employment, Skills and Business Strategy and Implementation Plan will be developed which will incorporate consultation feedback. We expect the final Strategy and Implementation Plan to provide more specific detail on the objectives, initiatives and activities, targets and milestones, and implementation processes, which are not covered in this outline strategy.	JLAs	The plan will include more specific detail on the objectives, initiatives and activities, targets, milestones, implementation processes and partners, including how objectives will be met at the local level. The approach to monitoring and evaluation of actions and impacts will be included. GAL recognises that the skills, employment and business growth and productivity fields are dynamic and fast-moving in terms of national and local policy responses, skill needs and demands and technological changes. The Strategy will look forward over a period of 16 years. Thus, the strategy and implementation plan will need to incorporate capacity for the projects and associated targets and outcomes to flex and change in response effectively to changing circumstances as required.	Please refer to ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198) for details.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	
3.36	Addressing localised need and opportunity	Currently, the strategy does not provide any specific details on initiatives linked to benefiting people living in local areas. In the final Employment, Skills and Business Strategy, we would expect to see more details of activities and initiatives linked to people	JLAs	The Strategy will address in as much detail as possible, how people living within each local authority area will benefit, based upon a more detailed socio-economic analysis to inform and support implementation. e.g. actions to enhance social mobility will be targeted at pockets of multiple	Please refer to ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198) for details.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	

		living in each local authority which is part of the defined Study Area. The baseline should also aim to identify specific minority and/or marginalised groups of people and communities as well as pocket of deprivation so that these areas can be targeted, where possible.		deprivation across the local area as well as target groups facing multiple barriers to engagement with the labour market; and we will connect with individual organisations, partnerships and existing and planned infrastructure with excellent links into local communities to make this happen. We would particularly welcome the potential to address very localised circumstances and priorities that would be highlighted through the baseline analysis that AECOM recommends that local authorities conduct, described in 3.226 of the Statutory Consultation Socio-Economics Response.			
3.37	Analysis of existing training/education providers	The Outline ESBS does not provide a baseline analysis of existing education/training providers. This is critical to identifying what additional provision may be required and where there may be opportunities to build on the existing offer of these providers. We would expect the final Strategy and Implementation Plan to include analysis of existing training/education providers.	JLAs	GAL has engaged two external education, skills and business stakeholder advisers, who collectively represent key, strategic education, training and business and regional growth and development infrastructure, including the Coast to Capital LEP, the Chichester College Group and the wider collective of providers spearheading the Institute of Technology and Gatwick Diamond Business/Initiative. They are supporting GAL to scope how to connect with existing providers and collaborations of providers. The Implementation Plan will list the core strategic education and training providers that we expect to work with, but will not include a full analysis of providers.	Please refer to Section 17.6 of ES Chapter 17 Socio-Economics (APP-042) and Para 5.3.45 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198) for details.	Section 17.6 of ES Chapter 17 Socio-Economics [APP-042] and Para 5.3.45 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	
3.38	Additional information on construction employment	The OESBS suggests that demand for construction workers will exceed the skilled labour available without clearly identifying the geographical area impacted by this labour shortage.	JLAs	To be informed by more detailed projections. The Construction Industry Training Board and the Civil Engineering Contractors Association have been engaged as advisors. Actions to address recruitment gaps include: working towards GAL accreditation as a National Skills Academy for Construction Training - a key hub and spoke initiative that will enable GAL to connect with skills provider networks and existing and potential talent pools from a range of private, public and community sector partnerships. GAL is keen to partner with other NSAfCT accredited organisations (notably the Crawley NSAfCT) to maximise opportunities to collaborate in recruiting to the sector across a range of housing and wider infrastructure projects.	Please refer to Section 17.6 of ES Chapter 17 Socio-Economics (APP-042) and Para 5.3.45 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198) for details.	Section 17.6 of ES Chapter 17 Socio-Economics [APP-042] and Para 2.2.11 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	
3.39	GAL's upskilling role	It is expected that the final Strategy will provide greater detail on the list of bespoke training needs and programmes including the external training providers. Will GAL fund or	JLAs	In order to complement rather than duplicate, use of existing training provision will be maximised. In practice, this will be supplemented by additional,	N/A	Para 5.3.6 of ES Appendix 17.8.1 Employment, Skills and	

		facilitate connections between prospective construction workers to existing provision		customised provision. GAL will both refer candidates to existing provision and fund additional elements.		Business Strategy [APP-198].
3.40	Inclusion of SMEs in the supply chain	How will GAL ensure, through the procurement process, that SMEs are included in contract supply chains.	JLAs	The CITB, CECA, Gatwick Diamond Business and Chambers of Commerce will support GAL to develop and deliver regular and timely promotional and awareness campaigns – potential supplier events to promote opportunities; training to convey skills, knowledge, expertise, protocols and processes that will be required of suppliers; and production of local supplier database – activity to be incorporated into overall monitoring and evaluation framework.	N/A	Table 5.2 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.41	Optimising opportunities for local people to gain operational jobs	Identification of a requirement for training remains unclear in terms of numbers and skills. How will needs be addressed in practice. There is no indication on how opportunities for local people will be maximised	JLAs	Employment and skills need and demand landscape will have dramatically changed by 2029. Methods for engagement with local communities will include advertising vacancies in advance of wider recruitment; outreach into local communities; engaging with local schools and colleges; working collaboratively with the Department for Work and Pensions/Jobcentre Plus to support job seekers into work; and conducting local awareness-raising campaigns, including use of social media.	N/A	Section 3.1 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.42	Exploiting inward investment opportunities	Reference to the potential to develop a clear regional identity is brief and vague and this should be explained in further detail,	JLAs	The ESBS Implementation Plan will describe how GAL will collaborate with partners to define and implement a clear regional ‘identity’ and promotion strategy. Initial scoping research, informed by a partner workshop, has just completed and the recommendations will inform the Implementation Plan.	N/A	Section 4.2 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.43	Engagement in ESBS development	Limited stakeholders are being engaged to inform the detailed plan. Can we receive update on the engagement approach and to potentially widen participation, including through consideration of the Local Skills Improvement Plan (hosted by Sussex Chamber of Commerce). LAs have business support/training provider connections that GAL may wish to engage with e.g. Recover and RISE	JLAs	We continue to work with Jeff Alexander of Gatwick Diamond Business and Initiative and Julie Kapsalis, Chair of C2C LEP and Catalyst South (now employed by NESTA), to advise on key strategic issues. We held 4 Round Table meetings in June with Businesses, Business Membership and Representative organisations (including Sussex Chamber) and education and training providers. GAL pilot recruitment actions have resulted in collaborative working with DWP, Jobcentre Plus, Colleges (including the Chichester Group and NEScot) and locally focused charitable organisations e.g. Sand Project on SEND. GAL has participated in the development of the LSIP and our proposals will contribute to priorities identified. GAL policy and engagement and innovation teams met with the RISE Head of Project at Brighton University	N/A	Para 2.2.5 onwards of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].

				15th June to discuss innovation collaboration potential. On completion of more detailed socio-economic analysis, GAL will invite discussions with local authorities on our proposals to reach communities and engage with training and business engagement infrastructure. Employ Crawley will be included in brokerage and outreach activity and we welcome collaborative working with Crawley NSAfC.			
3.44	Differentiate BAU and NRP ESBS	ESBS should reflect the baseline and be clear about what additional activities will be provided over and above business as usual?	JLAs	GAL is developing two parallel work streams. The first supports the achievement of GAL's Decade of Change. The other is specific to the proposed Northern Runway Project – actions that will only be delivered if we secure consent. Some strands are common to both, but the scale, precise form and level of resource that can be set in place to support these work streams would be dependent upon receipt of approval for the Northern Runway project.	N/A	Section 17.6 of ES Chapter 17: Socio-Economic [APP-042].	
3.45	Regional Promotion	Partners aware of a C2C commissioned report on inward investment and growth. Can clarity be provided on the role of this work in supporting GAL's ambitions within current growth plans, and also as part of expansion proposals? Mid Sussex is promoting the District via our inward investment strategy/brand.	JLAs	GAL commissioned the Airport Economic Zone research (reporting this summer) to identify how airports and other stakeholders effectively promote regions around airports and stimulate inward investment. The aim is to encourage discussion and plans for collective working by GAL and partners to define a clear 'identity' for our region, emphasising economic strengths and opportunities, and showcase the area for inward investors as part of Global Britain. The work aims to inform the strengthening of collaborative working to promote a healthy, resilient economy as we emerge from the pandemic. It will also inform future more substantial investments by GAL to maximise opportunities that would be enabled by the Northern Runway Project.	N/A	Table 5.6 of ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	
3.46	Baseline Assumptions Capacity and Forecasts	Planning B (Forecasting & Capacity) TWG appears to have raised some fundamental queries as to assumptions and information feeding into GAL's baseline. This is a fundamental issue that cuts across TWGs. It is critical that forecast and capacity are correctly assessed, as other assumptions and forecasts (including socio-economic) will stem from this.	JLAs	GAL is currently preparing a response to matters raised in the Planning B (Forecasting & Capacity) TWG on forecasts. A separate Planning B (Forecasting & Capacity) TWG has been arranged to consider capacity matters raised by York. GAL remains confident that its future baseline and NRP core case forecasts represent a reasonable and robust basis for environmental and economic impact assessment.	Please refer to Table 16: Forecasting.	Section 17.6 of ES Chapter 17: Socio-Economic [APP-042].	
3.47	Baseline Assumptions Capacity and Forecasts	Welcome that changed circumstances since the last round of consultation, including cost of living increases and rising fuel costs (both of	JLAs	Slower growth sensitivity cases were considered in the Economic Impact Report. GAL is reviewing the basis of this to update the assessment including Slower recovery from COVID; reduced / slower take	The Local Economic Impact Assessment report presents estimates for the slow growth sensitivity which reflects a worst-case traffic scenario for	Annex 2 Slow Growth Sensitivity of ES Appendix 17.9.2 Economic Impact of the	

		which could impact upon leisure and business flights), will be revisited in the baseline.		up of demand due to other factors including slower economic growth; Assumptions on reduced aircraft size and load factors, and seasonal spreading;	economic impacts consistent with the main traffic forecasts.	Northern Runway Project: Local Impact Assessment [APP-200].	
3.48	Socio-Economics / Economic – Key Documents Requested in Draft	Population and Housing Effects report;	JLAs	The assessment methodology and emerging findings of the Populations and Housing Effects assessment have been presented through a number of Socio-Economic TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.	N/A	ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].	
3.49	Socio-Economics / Economic – Key Documents Requested in Draft	Airport-Related Employment Land Study;	JLAs	An airport related employment land study has developed over the course of the pre-application stage of the Project, and has been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the study methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the updated findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals. We will look to discuss if there are any further outstanding matters or queries in relation to the study as part of the SoCG discussions.	N/A	N/A	
3.50	Socio-Economics / Economic – Key Documents Requested in Draft	Economic Impact Assessment	JLAs	The assessment methodology and emerging findings of the Economic Impact Assessments have been presented at a number of Socio-Economic TWGs, including sessions on 16th May 2022, 7th July 2022 and 28th September 2022. The Local Economic Impact Assessment is contained in ES Appendix 17.9.2 (Doc Ref. 5.3) [APP-200] and the National Economic Impact Assessment is contained in Appendix 1 to the Needs Case (Doc Ref. 7.2) [APP-251]. Both documents are available to view on PINS website.	N/A	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200] and Needs Case Appendix 1: National Economic Impact Assessment [APP-251].	
3.51	Socio-Economics / Economic – Key Documents Requested in Draft	Employment, Skills and Business Strategy.	JLAs	The Employment, Skills and Business Strategy is contained in ES Appendix 17.8.1 (Doc Ref. 5.3)	N/A	ES Appendix 17.8.1: Employment, Skills and	

	Documents Requested in Draft			[APP-198] of the DCO Application and available to view on PINS website. A summary of engagement with LAs and other stakeholders that has informed the preparation of the ESBS is contained in paragraphs 2.5 to 2.2.13 of the Strategy. This includes the Socio-Economic TWGs, as well as separate 'Insight Workshops' with LA Officers.		Business Strategy [APP-198].	
3.52	Socio-Economic / Economic – Detailed Information Requested	Socio-economic baseline conditions to be presented at a local authority level;	JLAs	<p>An overview of the baseline environment is set out in Section 17.6 of ES Chapter 17: Socio-Economic, including the economic and labour market baseline, population and housing baseline, and community facilities baseline. Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023</p>	N/A	ES Chapter 16: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197].	
3.53	Socio-Economic / Economic – Detailed Information Requested	A focused assessment of the population and housing impacts of the NRP on the six local authorities in closest proximity to the airport (Crawley, Horsham, Mid Sussex, Reigate and Banstead, Tandridge and Mole Valley);	JLAs	<p>The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. The assessment is available to view on PINS website.</p> <p>The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.</p>	N/A	ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].	
3.54	Socio-Economic / Economic – Detailed Information Requested	Employment impacts at a local authority level including the impacts of the scheme on local labour supply. This should in particular address concerns raised in the PEIR that the	JLAs	ES Chapter 17: Socio-Economics provides an assessment of the Project's effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing	N/A	ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].	

		NRP operational phase may result in local labour shortages, particularly in Crawley;		Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.			
3.55	Socio-Economic / Economic – Detailed Information Requested	A detailed forecast of all economic activity that will have an impact on labour supply at a local authority level;	JLAs	ES Chapter 17: Socio-Economics provides an assessment of the potential socio-economic effects of the Project, including effects on employment and the labour market. economic activity We have explained the approach to assessment at TWGs. The assessment focuses on the five defined study areas, but also provides employment estimates at the Local Authority level. Detailed data on economic activity at the local authority level is contained ES Appendix 17.6.1: Socio-Economic Data Tables, namely Tables 2.1.5 and 2.1.6.	N/A		ES Chapter 17: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197].
3.56	Socio-Economic / Economic – Detailed Information Requested	A detailed breakdown of the numbers and types of jobs that would be created during both construction and operation;	JLAs	A breakdown of the numbers and types of jobs to be generated in the construction and operational phases of the Project is contained in Section 17.9 of ES Chapter 17: Socio-Economics, highlighted in separate tables for each stage of the ES assessment.	N/A		ES Chapter 17: Socio-Economics [APP-042].
3.57	Socio-Economic / Economic – Detailed Information Requested	Analysis by GAL of the impact of the scheme on the labour supply for other non-airport related employment sectors;	JLAs	ES Chapter 17: Socio-Economics provides an assessment of the Project's effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.	N/A		ES Chapter 17: Socio-Economics [APP-042] and ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].
3.58	Socio-Economic / Economic – Detailed Information Requested	An assessment of the housing demand created by the scheme – impacts to be specifically identified for those local authority areas in closest proximity to the airport;	JLAs	The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. This includes an assessment of the demand for different tenures of housing, particularly in those areas immediately adjacent to Gatwick Airport where the majority of employment associated with the Project will be	N/A		ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].

				<p>based. The assessment is available to view on PINS website.</p> <p>The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.</p>			
3.59	Socio-Economic / Economic – Detailed Information Requested	A clear narrative around the methodology for assessing the magnitude of socio-economic effects, plus details on the guidance and standards that have been used to inform the assessment;	JLAs	The policy, guidance and standards that have directed the socio-economic assessment are set out in Section 17.2 of ES Chapter 17: Socio-Economics. The methodology and approach to defining magnitude and sensitivity is contained in Section 17.4 of ES Chapter 17.	N/A	ES Chapter 17: Socio-Economics [APP-042].	
3.60	Socio-Economic / Economic – Detailed Information Requested	Information on GVA generated by employment at Gatwick Airport and qualitative information on the level of employees and local spend by employees;	JLAs	ES Appendix 17.9.2: Local Economic Impact Assessment sets out the direct, indirect, induced and catalytic employment and value expected to be generated by the Project, including gross value added. This includes increases in the scale of economic activity on the site (i.e. direct impacts) and from employees spending their wages (i.e. induced impacts).	In addition to the response provided previously, to note, estimates for Gatwick Airport's baseline impacts in 2019 for direct, indirect, and induced impacts in terms of employment and value added are presented in Annex 4 of the Local Economic Impact Assessment.	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.61	Socio-Economic / Economic – Detailed Information Requested	A forecast of the economic growth in the local area which is unrelated to the airport;	JLAs	ES Appendix 17.9.2: Local Economic Impact Assessment factors in existing external assessments of baseline employment growth expected to occur, using Cambridge Econometrics forecasts and which have been cross-checked using Experian forecasts. Figure 4.2 of ES Appendix 17.9.2 explains the relationship between the assessment of the economic impacts between the existing Gatwick Airport as a whole, and with and without the Project.	N/A	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.62	Socio-Economic / Economic – Detailed Information Requested	Provision of baseline data on the number of Gatwick-related businesses and jobs at the local authority level;	JLAs	ES Appendix 17.9.2: Local Economic Impact Assessment sets out the baseline data for GAL related employment and other non-GAL related firms at the airport. A breakdown of the occupational	In addition to the response provided previously, to note, the Local Economic Impact assessment no longer covers baseline data which is discussed in the ES Chapter.	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	

				categories is contained in Annex 3 of ES Appendix 17.9.2.			
3.63	Socio-Economic / Economic – Detailed Information Requested	An assessment of the community impacts (effects on facilities and services) as a result of the NRP;	JLAs	ES Chapter 17: Socio-Economics provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services).	N/A	ES Chapter 17: Socio-Economics [APP-042].	
3.64	Socio-Economic / Economic – Detailed Information Requested	Detailed measures to prioritise local supply chains (to be set out in the ESBS);	JLAs	ES Appendix 17.8.1: Employment, Skills and Business Strategy (ESBS) sets out the strategy for how GAL would seek to enhance the skills, employment and training opportunities for both existing and new members of the labour market during construction and operation of the Project. The objectives within the ESBS focus on employment and skills activities within the Local Study Area and Local Market Area. It is proposed that the ESBS will be secured pursuant to the new s106 Agreement (see Table 5.2 of the Planning Statement).	N/A	ES Appendix 17.8.1: Employment, Skills and Business Strategy [APP-198] and Planning Statement [APP-245].	
3.65	Socio-Economic / Economic – Detailed Information Requested	Clarity on outcomes that are already identified in relation to the airport's current configuration, and the additional measures (value added) that would be achieved in relation to the NRP;	JLAs	The DCO Application is accompanied by both a National and Local Economic Impact Assessment, contained in Needs Case Appendix 1 and ES Appendix 17.9.2. The National Economic Impact Assessment provides an assessment of the national economic impacts that would result from the Project. The impact of the Project on local employment and gross value added are assessed in ES Appendix 17.9.2.	N/A	Needs Case Appendix 1: National Economic Impact Assessment [APP-251] and ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.66	Socio-Economic / Economic – Detailed Information Requested	A qualitative analysis by GAL (Oxera) of the effects of the scheme on FDI;	JLAs	Section 6.7 of the National Economic Impact Assessment contained in Needs Case Appendix 1 considers the potential welfare benefits from increased productivity as a result of an increase in trade associated with the Project at a national level. Although it is likely that a share of these productivity benefits would be realised by businesses within the local area around the airport, the assessment approach does not allow for a robust estimation of these local impacts. This is because the elasticities of passengers to trade and of trade to productivity are based on country-level data and cannot be used to understand an effect a regional level, as increased	GAL discussed its approach to trade and FDI in the context of TWG#4 and TWG#7 (Summer 2023). Trade impacts were quantified but excluded from the NPV estimate on the National Economic Impact Assessment to avoid double-counting issues with other quantified impacts. FDI impacts were not quantified given these benefits are usually realised through the same channels as trade and quantifying FDI impacts would likely result in double-counting.	Needs Case Appendix 1: National Economic Impact Assessment [APP-251] and ES Chapter 17: Socio-Economics [APP-042].	

				connectivity is likely to affect the trading sectors in each region differently. As a result, it is not possible to quantify the productivity benefits associated with trade at a local level and therefore it is scoped out of the socio-economic assessment. Further detail on this is set out in Table 17.4.2 of ES Chapter 17: Socio-Economics.			
3.67	Socio-Economic / Economic – Detailed Information Requested	A more detailed assessment of the approach to catalytic employment taken by Oxera – e.g. more detail is required around the catchment areas used for each airport and location of business activity relative to the airport. The applicant should set out what they mean by catalytic effects, the assumptions associated with this definition, its baseline position (including future baseline) and what has been discounted to reach a net figure for catalytic effects. Scenario testing also should be undertaken to understand the potential variations with levels of catalytic benefits from other major schemes in the planning pipeline;	JLAs	Section 6 of ES Appendix 17.9.2: Local Economic Impact Assessment sets out the assessment of the catalytic impact of the Project. This includes an explanation of what is meant by a catalytic effects and the methodology for estimating the effect. Prior to the submission of the DCO Application, a note prepared by Oxera on the methodology for the catalytic impacts was provided to the LAs in July 2023.	N/A	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.68	Socio-Economic / Economic – Detailed Information Requested	Direct, induced and catalytic impacts of the project on the Gatwick Diamond area, Five Authorities Area and for the UK. Impacts are also requested to be provided at the local authority level or at least the Northern West Sussex FEMA;	JLAs	Section 17.9 of ES Chapter 17: Socio-Economics provides an assessment of the indirect, induced, catalytic effects arising from the operational phase of the Project, based on the data in ES Appendix 17.9.2: Local Economic Impact Assessment. The assessment within ES Chapter 17 is provided on the basis of study areas, including Six Authorities Areas and Northern West Sussex Functional Economic Market Area and as well as nationally. Detailed data at the local authority level is contained in Table 3.1.2 of ES Appendix 17.6.1: Socio-Economic Data Tables.	N/A	ES Chapter 17: Socio-Economics [APP-042], ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197] and ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.69	Socio-Economic / Economic – Detailed Information Requested	An assessment of induced effects on construction employment and an assessment of the availability of construction workers by local area;	JLAs	An assessment of induced effects on construction employment and an assessment of the availability of construction workers by local area;	Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] Section 17.9 of ES Chapter 17: Socio-Economic [APP-042].	
3.70	Socio-Economic / Economic – Detailed	An assessment of induced economic activity associated with construction;	JLAs	Detailed analysis of the construction employment expected to be generated by the Project is provided	N/A	ES Chapter 17: Socio-Economic [APP-042].	

	Information Requested			in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic. The approach and methodology to the socio-economic assessment was discussed at the Socio-Economic TWGs on 2nd November, 18th November, 6th December 2022, and 31st July 2023			
3.71	Socio-Economic / Economic – Detailed Information Requested	A clear explanation of the calculations concerning the indirect and induced impacts and how these are distributed across the study areas;	JLAs	Section 5 of ES Appendix 17.9.2: Local Economic Impact Assessment explains the methodology to the assessment of the economic footprint of the Project, including the calculation of indirect and induced impacts, and how they are estimated for each study area.	N/A	ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.72	Socio-Economic / Economic – Detailed Information Requested	A breakdown of GAL's total workforce by local authority area (current and projected);	JLAs	Annex 3 of ES Appendix 17.9.2: Local Economic Impact Assessment sets out the baseline data for GAL related employment and other non-GAL related firms at the airport, broken down by occupational categories. Annex 3 provides the current employment baseline (direct, indirect and induced) and the estimated employment levels against the ES assessment years against the occupational categories. This data is defined by the Local Authority areas as well as the ES study areas.	N/A	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] and ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].	
3.73	Socio-Economic / Economic – Detailed Information Requested	Justification and appropriate evidence for the 80% Home Based / 20% Non Home Based ratio that GAL is using;	JLAs	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note provides an assessment on the likely distribution of the Project's construction workforce, based on two scenarios. Scenario 1 (primary scenario) assumes a split of 80% home-based workers and 20% non-home based workers, and Scenario 2 assumes 100% home-based workers. These two scenarios test the highest likely proportion of non-home based workers (i.e. 20%) and the lowest (i.e. 0%). This approach and justification for Scenario 1 as the primary (worst case) scenario is set out in further detail in Section 4 of ES Appendix 17.9.1, including a comparison to Construction Industry Training Board survey data and GAL's own experience.	N/A	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].	
3.74	Socio-Economic / Economic – Detailed	An assessment of the impact on property values as a result of the scheme (including	JLAs	The assessment of any likely significant effects of the Project on property values due to increased	N/A	ES Chapter 17: Socio-Economic [APP-042].	

	Information Requested	commercial property values) – as requested by PINS in its PEIR response;		frequencies of flights is scoped out of the socio-economic assessment. A detailed explanation of why this is scoped out is contained in Table 17.4.2 of ES Chapter 17: Socio-Economic.		
3.75	Socio-Economic / Economic – Detailed Information Requested	An assessment by GAL of whether there is a current and forecast surplus or shortfall in commercial floorspace, identified land allocations and the availability at certain sites within the ARELS FEMA – this should be undertaken at the more local level given the potential for a concentration of the impacts to be felt more locally to the airport. This should also discuss where demand for off-airport employment growth is likely to be located and when this is likely to come forward as the airport grows – it is not realistic to assume that employment floorspace demands can be evenly distributed across the study area, nor that the demands will be split on an equal year-by-year basis across the NRP programme;	JLAs	An airport related employment land study has developed over the course of the pre-application stage of the Project, and has been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the study methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the updated findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals. We will look to discuss if there are any further outstanding matters or queries in relation to the study as part of the SoCG discussions.	N/A	N/A
3.76	Socio-Economic / Economic – Detailed Information Requested	Information on the relationship between Economic Impact Assessment and ICF air traffic forecast and to explain the assumptions regarding capacity at other airports, air fare savings, the impact of assuming a 3rd runway at Heathrow and the treatment of the carbon costs in the demand forecasts and in the WebTag appraisal	JLAs	<p>Section 8.3 of the Needs Case explains the relationship between the air traffic movements (ATM) forecasts and how this will lead to different types of economic impacts.</p> <p>ES Appendix 4.3.1: Forecast Data Book presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Section 4 of ES Appendix 4.3.1 explains the implications of Heathrow Airport's third runway, and Section 7.3 explains the assumptions that have been made regarding the capacity of other London Airports.</p> <p>The National Economic Impact Assessment, contained in Appendix 1 of the Needs Case, provides analysis on air fares. In particular, Section 5.4 of the assessment describes how air fares have been forecast in the baseline, Project and unconstrained scenarios to provide fare modelling analysis. The</p>	N/A	Section 8.3 of the Needs Case [APP-250], ES Appendix 4.3.1: Forecast Data Book [APP-075] and Needs Case Appendix 1: National Economic Impact Assessment [APP-251].

				National Economic Impact Assessment also provides analysis of monetised impacts of greenhouse gas emissions, based on low, central and high carbon price scenarios, within Section 7.3 of the report, with consideration of the impact of capacity expansions at other London Airports (including Heathrow) included in Annex B to the Report.			
3.77	Socio-Economic / Economic – Detailed Information Requested	Up to date Travel to Work data that takes into account the implications of COVID.	JLAs	Section 17.6 of ES Chapter 17: Socio-Economics explains the socio-economic characteristics of the current baseline environment, including the method of travelling to work. Paragraph 17.6.42 of ES Chapter 17 explains the relationship to the Covid-19 pandemic. Detailed data on the method of travel to work at the Local Authority level is contained in ES Appendix 17.6.1: Socio-Economic Tables, namely Table 2.1.25.	N/A	Section 17.6 of ES Chapter 17: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Tables [APP-197].	
3.85	Aviation Capacity and Forecasting, and Socio-Economics	Criticisms were made in November 2022 of the basis of the socio-economic impact assessment, particularly in relation to its reliance on Gatwick being the only airport to increase its capacity over the period of its plans, an overstatement of the fare and user benefits arising from the NRP that underpinned the economic appraisal. Criticisms were also made of the robustness of the methodology used to assess the wider economic benefits deriving from the connectivity offered by growth at Gatwick, in particular the failure to use available data on how UK airports are used and the origins of passenger demand. The Authorities were promised further explanation of the methodology in January 2023, and it was understood that the Applicant would be revising its modelling to take the criticisms into account. To date no further information has been provided and, as a consequence, the economic case cannot be considered robust.	JLAs	The detailed information provided in ES Appendix 4.3.1: Forecast Data Book (FDB) demonstrates that these issues have been noted and addressed. They have also been discussed at length in the Technical Working Group meetings and continue to be the subject of engagement through the SoCG process. Plans for other airport expansion are directly addressed in the FDB at sections 3 and 7 - and sensitivity tests set out in Annexes 4 and 5. The origin of passenger demand is directly addressed in section 5 and in the 'Pipeline report' provided at Annex 6. Please also refer to the GAL response to those issues identified under the 'Socio-Economic / Economic - Detailed Information Requested' section in the related March 2023 issues tracker	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075].	
3.86	Visual Impact and Land / Water / Biodiversity	Evidence supporting conclusions on need for on-airport office provision;	JLAs	The Project proposes one new office block as set out in paragraph 5.2.82 of ES Chapter 5: Project Description, largely driven by the proposed conversion of the existing Destinations Place offices to a hotel. The demand for on-airport office provision	The office provision has been calculated to meet the needs of airport companies and passengers in view of the forecast growth facilitated by the NRP.	N/A	

				was informed by an airport related employment land study which has developed over the course of the pre-application stage of the Project and been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the assessment methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals.			
3.87	Visual Impact and Land / Water / Biodiversity	Evidence supporting conclusions on need for hotel provision;	JLAs	The Project proposes four additional hotels, as set out in paragraph 5.2.81 of ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030]. The demand for on-airport hotel provision was informed by an airport related employment land study which has developed over the course of the pre-application stage of the Project, and been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the assessment methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals.	The hotel provision has been calculated to meet the needs of airport companies and passengers in view of the forecast growth facilitated by the NRP.	N/A	
3.88	Southern runway safeguarding	The council recommends that GAL formally states that it no longer requires national policy to require land at Gatwick to be safeguarded for a potential future southern runway. This will allow Crawley to identify land new	CBC	N/A	The NRP would not remove the need to continue to safeguard land for a potential future southern runway. This matter is being dealt with separately as part of the CBC Local Plan review.	N/A	

		employment land to accommodate economic growth associated with the NRP.					
3.89	Community compensation initiatives	CBC has recommended a range of community compensation initiatives and would urge GAL to engage with the council to scope these further.	CBC	N/A	Community funding and investment is addressed in Section 2.7 of the Planning Statement.	Section 2.7 Planning Statement [APP-245]	
3.90	Mitigation measures	GAL should explain in detail its reasoning for the NRP proposing so few mitigation measures for the communities affected by the proposals, when compared to the far greater compensation proposed through the original 2nd runway proposal for the Airports Commission study.	CBC	N/A	Community funding and investment is addressed in Section 2.7 of the Planning Statement. ES Appendix 5.2.3 Mitigation Route Map sets out the mitigation measures proposed for the Project.	Section 2.7 Planning Statement [APP-245] ES Appendix 5.2.3 Mitigation Route Map [APP-078].	
3.91	Socio-economic receptors monitoring	No monitoring measures have been proposed in relation to socio-economic receptors. CBC strongly encourage GAL to undertake monitoring of the economic outcomes delivered through the NRP.	CBC	N/A	This comment was raised in the Autumn 2021 consultation and a response was provided; GAL stated that a monitoring, recording and evaluation framework will be designed and implemented in order to measure progress and achievement of outcomes committed through the Employment, Skills and Business Strategy. No specific monitoring measures are proposed in relation to socioeconomic receptors over and above any monitoring measures that are proposed as part of other assessments which have been used to inform the socio-economic assessment. The ESBS includes a section on Governance, Performance Management and Monitoring.	Consultation Issues Tables Autumn 2021 [APP-219], ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198] ES Chapter 17 Socio-Economics [APP-042] Table 17.8.1.	
3.92	Hotel need	The consultation information suggests that the forecast hotel bed need has increased since the Autumn 2021 consultation, but CBC is unsure why this is the case. Has forecast passenger growth increased since the previous consultation, necessitating the increased hotel need? CBC would be interested in reviewing the technical evidence supporting the conclusions on the need for hotel provision, and in understanding how they meet the Associated Development test for the DCO. As it stands, it is unclear why the identified hotel need appears to have increased.	CBC	N/A	The hotel provision has been calculated to meet the needs of airport companies and passengers in view of the forecast growth facilitated by the NRP.	N/A	

3.93	Hotel provision	As a point of clarity, the council would ask GAL to explain whether hotel provision represents an operational use that meets the DCO 'associated development' test (as they are not included as an operational building under Part 8 of the GPDO). Whilst there are clear sustainability benefits to on-airport hotel provision, this would not at face value (given that hotels are located off-airport also) appear to justify their identification as an operational use. If GAL does consider hotels to be an operational use, it would be helpful to understand why this is felt to be the case. This is an important point to clarify, as if hotels are not operational uses, then they should be subject to a separate planning application rather than be included in the DCO.	CBC	N/A	<p>Section 115 of the 2008 Act provides that development consent may be granted for “associated development” alongside “development for which development consent is required”. “Associated development” is defined as development associated with the principal development.</p> <p>As per the 'Guidance on associated development applications for major infrastructure projects' (Department for Communities and Local Government – April 2013), it is for the Secretary of State to decide on a case-by-case basis whether development constitutes “associated development”. By reference to the 'core principles' that the guidance notes the Secretary of State will take into account:</p> <ul style="list-style-type: none"> • Associated development should support the construction or operation of the principal development or help address its impacts. Hotel accommodation on-site supports the operation of the airport in providing necessary accommodation for passengers. It further helps to address the airport's impacts, as alluded to in the Councils' comment, by reducing the need for transport between accommodation and the airport. • Associated development should be subordinate to the principal development. The hotels are subordinate to the use of the airport and facilitate this use. They are not an aim in themselves. • Development should not be treated as associated development if its purpose is solely to cross-subsidise the principal development. That is not the case here. • Associated development should be proportionate to the nature and scale of the principal development. The hotels are a proportionately small part of the overall proposed development. <p>In light of the above application of the 'core principles', GAL considers that it is open to the</p>	N/A	
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					Secretary of State to conclude that the hotels are "associated development", and that such a conclusion is clearly justified.		
3.94	Jet Zero	<p>CBC notes that GAL has compared its 2047 demand projections with the DfT JetZero updated national forecasts for 2050 in Table 3.3. This is misleading in two ways:</p> <ul style="list-style-type: none"> • Firstly, it is comparing 2047 with 2050 and GAL is silent on whether they would still expect growth beyond 2047 with the NRP. • Most of the growth projected with the NRP is over the period to 2038. By comparing at 2032 or 2038 (DfT has provided year by year figures), GAL's projected growth is almost double or 50% greater than the rate of growth projected nationally, implying a substantial increase in market share which would be at the expense of other airports and would need to be accounted for at the very least by displacement allowances in the economic assessment. By 2047, the gap has narrowed substantially. All of GAL's assumed growth is front loaded to the period to 2032, beyond 2032 Gatwick's growth is slower than DfT's assumed national growth rates. This has the effect of bringing forward the benefits and will skew the economic appraisal that has been presented. 	CBC	N/A	<p>Growth has been discussed as part of the topic working groups and detail beyond 2047 was discussed. In this period further modest growth rates are assumed across the wider London market as well as limited growth at Gatwick due to the binding constraints. 2032 and 2038 have been used as they are the focus assessment years though annual growth trajectories have been shared and discussed. GAL's growth with the NRP is ahead of the national average because the new capacity will enable more passengers to travel in the constrained London airport system. Growth in the period FY29-32 is strong, this is the period when the NRP is assumed to open and demand ramp up. By the early 2030s demand across the London airports will significantly exceed supply supporting this growth trajectory. The national EIA accounts for the impacts on the other London airports (London-level analysis) that share a similar catchment area to Gatwick.</p>	ES Appendix 4.3.1: Forecast Data Book [APP-075].	
3.95	Off-airport employment growth	<p>There is a need to discuss where demand for off-airport employment growth is likely to be located and when this is likely to come forward as the airport grows – it is not realistic to assume that employment floorspace demands can be evenly distributed across the study area, nor that the demands will be split on an equal year-by-year basis across the NRP programme – it would seem more likely that the locational requirements of such employment would be to locate as close to the airport as possible.</p>	CBC	N/A	<p>The ARELS work has been completed. The study has assessed land supply implications associated with identified growth – consideration has been given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration has been given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS has assessed the total quantum of future airport-related space. GAL would be happy to discuss the ARELS work with the authorities; however, it should be noted that the ARELS has not assessed suitability or deliverability of the land identified by local authorities (i.e. where space should be located). Growth as a result of the NRP</p>	N/A	

					will emerge over a long period of time and will to a large extent be indistinguishable from background changes in land use patterns. Businesses serving the airport or its supply chains, or those that use it as passengers will have the opportunity to grow and some of that will mean they need to expand. How and where they do that will be a matter for them and their ability to either find premises or get planning consents to accommodate that growth. It would be spurious to seek to estimate with any precision how space should be provided and where it should be located.	
3.96	Travel to work data	Travel to work data from employer survey 2016 does not allow for impacts of covid to be considered. Up to date travel to work data is needed prior to submission.	CBC	N/A	There is no evidence that Covid has changed the spatial distribution of travel to work patterns. It has changed the frequency with which some occupations attend their place of work or work from home. Many roles at Gatwick cannot be done from home so these would not be affected by such changes. The Employer Survey therefore remains the most robust means of estimating travel patterns. At the time of submission, no update to the travel to work data was available to inform the analysis. This data is used in the technical assessment of local economic impacts as an input on the geographic distribution of Gatwick on-site employees (i.e. where employees reside).	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].
3.97	Construction employment	Induced effects of construction employment - AECOM assume there will be an assessment of induced economic activity associated with construction in the ES. GAL recognised at TWGs #6 that this could be undertaken, but given nature of construction employment it doesn't make sense to do this. LAs request further explanation why this is the case.	CBC	N/A	Wider effects of the construction phase have been assessed in terms of potential impacts on the construction supply chain measured relative to the scale of construction sector enterprises (as opposed to employment which is used for direct effects only) in each of the assessment areas.	ES Chapter 17 Socio-Economics [APP-042] Table 17.4.1 and corresponding parts of Sections 6 and 7.
3.98	NRP impact	Study area does not adequately capture the impact on local authority areas most impacted by the NRP, including the six local authorities in closest proximity to the airport.	HDC	N/A	Queries regarding the geographies used were raised in the Autumn 2021 consultation (in response, additional geographies were added, existing geographies were amended and outputs at local authority level were added where appropriate). In the Summer 2022 Consultation it was commented that two of the geographies used were too large to understand the effects closer to	Consultation Issues Tables Autumn 2021 [APP-219], Consultation Issues Tables Summer 2022 [APP-221], ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13, Socio-

					<p>the airport, although no changes were made to the assessment as a range of small and large geographies were already being used. A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter.</p> <p>A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and housing effects, outputs are given at a local authority level within Annexes including (for the key scenarios) a total specifically for the NWS HMA.</p>	<p>Economic Effects Figures [APP-052] Figure 17.4.2, Appendix 17.6.1 Socio-Economic Data Tables and Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 1.2.1-6 and Annexes 4, 7 and 8.</p>	
3.99	Labour Market Area	Labour Market Area is too large to allow local authorities to understand impact on own area.	HDC	N/A	<p>This comment was made in the Summer 2022 consultation; as set out in GAL's response in the row above different study areas have been selected based on the impacts that need to be assessed. The reasoning is detailed in the Socio-Economic Chapter.</p>	<p>ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13.</p>	
3.100	Local authority rural areas	Only a small rural area of Horsham District has been included in the Local Study Area – suggesting it covers six local authority areas is misleading.	HDC	N/A	<p>It is confirmed within the Socio-Economic Chapter that the Local Study Area incorporates the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge. The selection of output areas is based upon a 'best fit' match of the urban area surrounding Gatwick, incorporating the main towns of Crawley and Horley and some smaller settlements located near to the Project site boundary such as Charlwood, Copthorne, Hookwood, Ifieldwood, Salfords and Smallfield. A map of the Local Study Area is also provided.</p>	<p>ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13 and Socio-Economic Effects Figures [APP-052] Figure 17.4.1</p>	

3.101	Economic Impact Assessment	Gatwick Economic Impact Assessment area has been constrained to reflect the PEIR population and housing study areas, rather than expanding PEIR areas to incorporate the established Gatwick Diamond and Coast to Capital areas.	HDC	N/A	Since PEIR, the economic impact assessment has been split into two parts – local and national. The Local Economic Impact assessment is appended to the Environmental Statement. The spatial areas in that appendix are consistent with those in the main ES chapter. These include the Gatwick Diamond. The largest spatial scale is now a six local authorities area (West Sussex, East Sussex, Surrey, Kent, Croydon, Brighton and Hove)	ES Chapter 17 Socio-Economics [APP-042] and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200]	
3.102	Growth triggered by expansion	No work has been undertaken by HDC to include growth triggered by the expansion. There are no acknowledgements of constraints on housing supply in the area and further work is required. Water Neutrality has significantly constrained housing delivery in the District. Given the complexities around this issue, projecting forward LPA housing trajectories is likely to be insufficient and not a worst-case scenario.	HDC	N/A	As set out in GAL's response to housing comments in the Summer 2022 consultation, the housing trajectories used are based on the most recently available at the time of writing, published position of each local authority. These trajectories give a future baseline (in terms of anticipated levels of housing, population and labour force growth). These outcomes have been compared with the housing demand which would be generated based on economic forecasts (from Cambridge Econometrics) plus the Project, to identify any potential shortfalls. Housing demands associated with the Project are therefore implicit within the analysis. The Assessment of Population and Housing Effects is clear that outputs post-2031 should be treated with some caution as many trajectories published by authorities do not go beyond this date. In particular, acknowledging the supply constraints that are likely to exist in Crawley, the analysis trends forward a lower housing figure than the overall trajectory average for the period beyond Crawley's current trajectory. The Assessment of Population and Housing Effects also gives detailed consideration to the issues of water and nutrient neutrality insofar as they relate to housing trajectories and delivery assumptions within the modelling.	Consultation Issues Tables Summer 2022 [APP-221], Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 4.3.1-14.	
3.103	Impact on housing market delivery	Insufficient acknowledgement of the role that Gatwick will play on driving housing market delivery, and the assessment on transport networks, social and community infrastructure. Further work is required to establish appropriate contributions can be put	HDC	N/A	As noted above (comment 3.100) the assessment of population and housing effects compares likely growth based on housing trajectories (published position of each local authority) with the housing demand which would be generated based on economic forecasts with the Project; housing demands associated with the Project are therefore	Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 4.3.1-14. ES Chapter 17 Socio-Economics [APP-042] Table 17.4.1 and	

		forward to support local authorities and the impact on local communities.			implicit within the analysis. Impacts on demand for social and community infrastructure are assessed having regard to the conclusions of the assessment of population and housing effects. Impacts on transport networks are considered within ES Chapter 12 Traffic and Transport.	corresponding parts of Sections 6 and 7. Transport network impacts considered in ES Chapter 12 Traffic and Transport [APP-037].
3.104	Impact on affordable housing provision	Insufficient information on the types of job provided and how this will impact housing need, especially affordable housing across tenures and the private rented sector. At a minimum, baseline data on the impact of low paid employment growth on affordable housing need is required.	HDC	N/A	<p>In the Autumn 2021 consultation greater clarity was sought on the number, type, quality, and location of jobs created by the Project; GAL's response set out the further work that would be undertaken in this regard, including assessing the impact on temporary housing need during construction and housing need across different tenures during operation. In the Summer 2022 response a similar comment was made, that housing affordability should be considered and include types and tenures for new workers and concerns that the assessment did not take account of the type and quality of employment being generated and how this translates into the need for different types of housing. GAL's response reiterated that the potential need for affordable housing in the operational phase was included in the analysis.</p> <p>The Assessment of Population and Housing Effects contains specific analysis of housing need during the construction phase, including the scope within the private rented sector and another housing types/tenures to accommodate potential demand (based on peak employment). It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>	<p>Consultation Issues Tables Autumn 2021 [APP-219], Consultation Issues Tables Summer 2022 [APP-221], Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 6 and 7.</p>

3.105	Impact on property values	Impact of the NRP on property values has been scoped out by GAL, against PINS' advice. In May 2022 GAL suggested a study was being commissioned. This study has not been shared with the local authorities. HDC asks whether this study included commercial property values and affordable housing as requested.	HDC	N/A	The assessment of any likely significant effects of the Project on property values due to increased frequencies of flights is scoped out of the socio-economic assessment. A detailed explanation of why this is scoped out is contained in Table 17.4.2 of ES Chapter 17: Socio-Economic.	ES Chapter 17 Socio-Economics [APP-042].	
3.106	Impacts on temporary construction workforce on local housing	Concerns around labour supply and impacts of temporary construction workforce on demand and delivery of local housing and other infrastructure. Displacement of construction workers from local housing schemes may impact housing delivery. Without proper mitigation there may be unwelcome impacts on the housing market.	HDC	N/A	A similar comment was raised in the Autumn 2021 consultation, stating that further evidence was needed to demonstrate that the Project will not impact negatively on the delivery of housing in the local area (as a result of construction workers being taken from housing schemes). As outlined in GAL's response, the timescales of each cumulative scheme have been considered in respect of overlapping the various phases of the Project; the cumulative assessment has not identified any issues on this respect.	Consultation Issues Tables Autumn 2021 [APP-219] and ES Chapter 17 Socio-Economics [APP-042] Section 17.11 (Cumulative Effects).	
3.107	NRP and Land West of Ifield housing proposal	Lack of consistency in approach considering interaction between the NRP and Land West of Ifield housing proposal in the PEIR (i.e. in assessment of the certainty of delivery, a different approach has been taken for the Socio-Economics and transport assessments)	HDC	N/A	<p>In socio-economic terms, Land West of Ifield is considered as part of the cumulative effects assessment.</p> <p>West of Ifield was identified in the long list and was also short listed for the cumulative effects assessment (as shown in Appendix 20.4.1 Short and Long List of other Developments), in accordance with the methodology set out in section 20.4 of Chapter 20: Cumulative Effects and Inter-relationships and therefore has been considered in the cumulative effects assessment in the ES.</p> <p>The approach to transport modelling is based on Department of Transport (DfT) Transport Analysis Guidance (TAG) Unit M4. However, based on stakeholder comments, West of Ifield has been modelled separately together with Horley Business Park and Gatwick Green. The assessment is contained in section 12.11 of Chapter 12 of the ES, as well as in full detail in Annex B of the Transport Assessment (Strategic Modelling Report).</p>	<p>ES Chapter 17 Socio-Economics [APP-042] Table 17.11.1.</p> <p>ES Chapter 20 Cumulative Effects and Inter-relationships [APP-045].</p> <p>Appendix 20.4.1 Short and Long List of other Developments [APP-216].</p> <p>Section 12.11 of ES Chapter 12 Traffic and Transport [APP-037].</p> <p>Annex B of the Transport Assessment [APP-260].</p>	

3.108	Long-term economic development	Impact on long-term economic development – how are additional jobs assessed temporally – further context is required	HDC	N/A	Up-to-date macroeconomic data (from DfT TAG Annual parameters and other sources) was used to assess local employment impacts of the Project. Additional jobs are estimated on the basis of additional forecasted activity at the airport and modelled impacts of this additional activity on the local economy.	ES Appendix 17.9.2 Local Economic Impact Assessment (APP-200)	
3.109	Airport-associated employment	No information provided on level of Gatwick Airport-associated employment that currently exists in the District.	HDC	N/A	Baseline employment and GVA impacts for Gatwick Airport are presented in ES Appendix 17.9.2 Local Economic Impact Assessment at the local authority level.	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.110	Key transport routes	Lack of mitigation on key transport routes within Horsham District – how this may impact local economy.	HDC	N/A	<p>The consideration of the Project’s impacts on the transport network and any necessary mitigation are set out within ES Chapter 12 Traffic and Transport.</p> <p>The Transport Assessment has considered all the impacts of the project throughout the wider study area, and is based on detailed modelling of travel behaviour and distribution. Mitigation has been provided where it is required, based on this assessment. In addition the Surface Access Commitments include a separate Transport Mitigation Fund, which may be used to support further interventions, should the need arise for additional measures in the area surrounding the Airport as a direct result of airport-related growth. The intention of this fund is to give assurance that resource will be available for additional interventions in support of the commitments set out, or to provide mitigation of an unforeseen or unintended impact from the Project.</p>	ES Chapter 12 Traffic and Transport [APP-037].	
3.111	Extent of the Local Study Area	Promised discussion about the extent of the Local Study Area (TWG 1 May 2022, Slide 9) was welcomed, however engagement has not taken place.	HDC	N/A	Background on the evolution of the Local Study Area geography is set out in the Socio-Economic Chapter. This sets out that feedback from PINS requested that the Local Study Area should be spatially defined and justified in greater detail in the ES, and comments from neighbouring authorities questioned the extent of the Local Study Area; in response the spatial extent was revised to include more of the neighbouring communities around the Airport. This has been informed by the settlement hierarchy within the LSA geography and the presence of local services	ES Chapter 17 Socio-Economics [APP-042] Table 17.3.1, 17.3.2 and para 17.4.7-12 and Socio-Economic Effects Figures [APP-052] Figure 17.4.1	

					and concentrations of population. This change was identified as part of the TWG presentations.		
3.112	Indirect and induced impacts	Explanation of the calculations for the indirect and induced impacts required.	HDC	N/A	The indirect and induced impact methodology used, as well as the resulting multipliers are explained in detail in ES Appendix 17.9.2 Local Economic Impact Assessment (APP-200).	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.113	Catalytic effects	Unclear what is meant by catalytic effects, the assumptions associated with this definition, its baseline position (including future baseline) and what has been discounted to reach a net figure for catalytic effects – these may be overstated. Scenario testing required.	HDC	N/A	Catalytic impacts refers to the economic activity of firms that are not in the indirect or induced footprint of the airport choosing to locate near the airport because of the connectivity that it offers. The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic.	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.114	Employment Impact Assessment	Which study areas have been used for the employment impact assessment, and does this include an assessment of employment impacts at the local authority level.	HDC	N/A	The economic impact of the Project has been assessed on the UK as a whole, as well as on three sub-national areas: the Gatwick Diamond (local authorities close to the airport), a defined Labour Market Area (the relevant labour market area around the airport), and the Six Authorities Area (a whole sub-regional area). ES Appendix 17.9.2 presents impact estimates in terms of employment and GVA by local authority.	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.115	Trade/FDI impacts	Have Trade/FDI impacts been included in the assessment?	HDC	N/A	Trade impacts have been assessed quantitatively but were not included in the Net Present Value calculations presented due to concerns of double-counting. FDI impacts are discussed qualitatively but not assessed quantitatively due to double-counting issues with the trade estimates presented.	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].	
3.116	Study areas for indirect and induced impacts	GAL to confirm study areas for indirect and induced impacts. There is a lack of consistency around how the induced and indirect footprint info is presented on different slides in relation to study areas.	HDC	N/A	The economic impact of the Project in terms of employment and GVA has been assessed on the UK as a whole, as well as on three sub-national areas: the Gatwick Diamond (local authorities close to the airport), a defined Labour Market Area (the relevant labour market area around the airport), and the Six Authorities Area (a whole sub-regional area).	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].	
3.117	Local construction employment	Scheme expected to attract new entrants to construction, but where from? Existing skills in	HDC	N/A	Baseline analysis of the current labour market in the local area has been completed within the SE Chapter, including analysis of population,	ES Chapter 17 Socio-Economics [APP-042] Section 17.6 Baseline	

		local area does not appear to have been undertaken			economic activity, unemployment, occupation, qualification, earnings, deprivation, employment, commuting and business profile. The future baseline (including working age population and labour supply) is also set out. These inform the assessment of effects, which include effects on employment, the labour market, business disruption and business displacement.	Conditions and Section 17.9 Effects.	
3.118	Home-based worker split	Unclear how home-based worker split has been reached.	HDC	N/A	This is explained in the Gatwick Construction Workforce Distribution Note. The average proportion of non-home based workers in England is 5% and in the South East is 7%. Based on GAL's experience of major construction, a higher % was tested because of the specialist areas of work required and the need to contract for these workers nationally rather than regionally. This therefore tests a higher impact on local accommodation markets.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] Gatwick Construction Workforce Distribution Note [APP-199].	
3.119	Forecasts data	Clarification required that the approach to the demand forecasts is a bottom-up market intelligence approach. Further information is requested on the specific assumptions used to derive forecasts. Details of the source for the DfT high and low growth market projections	HDC	N/A	<p>The approach is a combination of a top down and bottom up forecasts. Gatwick is forecasted to be operating in an even more constrained environment when the NRP is assumed to open (FY29-30). Bottom up assumptions regarding how the incremental capacity will be taken up by airlines provide useful insight around the markets, airlines, aircraft types likely to make use of the capacity. This helps inform the potential throughput of the airport (for example, growth in long haul supports a higher average seat count across the airport and flatter year-round schedules.</p> <p>The allocation of new slots is considered based on the principles of slot allocation whilst capturing the input from airlines in today's market context and their aspirations for growth in the medium term. These parameters are not considered by top down forecasts.</p> <p>The top down model provides support around the overall levels of demand, the share of the respective demand segments that Gatwick is likely to achieve. It also captures the constraints</p>	ES Appendix 4.3.1: Forecast Data Book [APP-075].	

					<p>of other airports and the balance of demand across the London airports.</p> <p>Overall market growth rates assumed by GAL aligned with wider DfT (Jet Zero '22) forecasts derived from econometric forecasts for the wider UK aviation market. These forecasts are provided by the DfT where they also share sensitivities around scenarios for high and low growth trajectories.</p>	
3.120	Catalytic employment	More detailed explanation required of approach to catalytic employment taken.	HDC	N/A	The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].
3.121	Assessment at local level	Disagree with GAL's decision not to undertake assessments at a local authority level as will not capture sensitivities or impacts. As a minimum, GAL should assess the local authorities in closest proximity.	HDC	N/A	See comment in response to row 3.96 above. A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. Local authority level outputs are also provided. A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and housing effects, outputs are given at a local authority level within Annexes including for the key scenarios a total specifically for the NWS HMA.	Consultation Issues Tables Autumn 2021 [APP-219], Consultation Issues Tables Summer 2022 [APP-221], ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13, Socio-Economic Effects Figures [APP-052] Figure 17.4.2, Appendix 17.6.1 Socio-Economic Data Tables [APP-197] and Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 1.2.1-6 and Annexes 4, 7 and 8.

3.122	Distribution of construction workforce approach	Distribution of construction workforce has been captured through a Gravity Model (based on distance alone) which is too simplistic. Using either time or generalised cost would be preferable as this takes into account level of connectivity and impact of traffic. Higher concentration of workers, particularly specialised, may exist and this will lead to greater impact on some local authority areas than others.	HDC		The Gravity Model uses distance rather than time or generalised cost because it draws on a dataset of construction worker travel patterns which is itself distance-based.	Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note [APP-199] Section 6.1.	
3.123	Magnitude of impact	GAL has opted to assess magnitude of impact based on set thresholds. These thresholds are not informed by guidance but decided by GAL and are similar across all receptors, phases and impact areas. This approach appears very simplistic. Whilst we do appreciate the high number of assessments that will be needed, applying the same thresholds to all receptors skew the analysis. For instance, we would expect an increase of 5% in housing demand to be high, not low. On the other hand, an increase of 5% in access to sport, leisure facilities and open space may be considered as low.	HDC	N/A	As shown in the Socio-Economics Chapter to the ES, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment, however proposed thresholds were presented during Topic Working Groups for comment.	ES Chapter 17 Socio-Economics [APP-042] Table 17.4.5-6.	
3.124	Key impacts for the population, housing, jobs and labour supply assessments	Clarification of what the "pinch points" will capture in terms of the local authority impacts for the population, housing, jobs and labour supply assessments (particularly for those closest LA areas). Insufficient engagement with the LAs to inform these outputs.	HDC	N/A	As outlined in GAL's response to the Autumn 2021 consultation, the assessment of Population and Housing Effects adopts the same approach (using PopGroup) as applied in Strategic Housing Market Assessments which are typically prepared for the purposes of plan-making. It adopts demographic-led, housing-led and employment-led scenarios which are appropriate for the purposes of assessing housing and labour market impacts for EIA purposes. Working outputs (in the form of headline figures, charts, graphs and tables) were presented during Topic Working Groups. GAL's response to the Summer 2022 consultation also clarified the approach taken in the Assessment of Population and Housing Effects, namely that housing trajectories give a future baseline (in terms of anticipated levels of housing, population and labour force growth) and that these outcomes are compared with the	Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 5 Labour Supply Analysis and Annexes 7 and 8. Consultation Report Annex B – Autumn 2021 Consultation Consultee Response Summaries [APP-220]. Consultation Report Annex D Summer 2022 Consultation Consultee Response Summaries [APP-222].	

					housing demand which would be generated based on economic forecasts (from Cambridge Econometrics) plus the Project, to identify any potential shortfalls. The Assessment of Population and Housing Effects gives a detailed labour supply analysis for each local authority and housing market area within the study area, plus the study area as a whole. Graphs and headline figures are presented in the main report for ease of reading however full local authority level outputs are provided as Annexes in response to comments made by local authorities requesting this additional detail.	
3.125	Impact on housing	Impact on housing does not appear to fully take into account the increased pressure on temporary accommodation created by migration - particularly given existing pressures in local authority areas and that migration is expected to accelerate so may go beyond a temporary constraint. Insufficient engagement with local authorities on figures used to inform housing, hotel, B&B and temporary accommodation assumptions.	HDC	N/A	See comment in response to row 3.102 above. In the Autumn 2021 consultation greater clarity was sought on the number, type, quality, and location of jobs created by the Project; GAL's response set out the further work that would be undertaken in this regard, including assessing the impact on temporary housing need during construction. In the Summer 2022 response a similar comment was made, requesting that GAL work with local authorities to identify the best location for any short-term temporary accommodation for construction workers and to consider how their social and health needs would be met. GAL's response reiterated that an assessment of the potential demand for housing during the construction phase has been added to the Assessment of Population and Housing Effects. The Assessment of Population and Housing Effects contains specific analysis of housing need during the construction phase, including the scope within the private rented sector and another housing types/tenures to accommodate potential demand (based on peak employment). It shows that the demand for temporary accommodation during the construction phase from NHB workers is unlikely to give rise to significant housing effects as the number of NHB workers (even at its peak) represents a very small proportion of the potential sources of supply available to meet this demand	Consultation Issues Tables Autumn 2021 [APP-219], Consultation Issues Tables Summer 2022 [APP-221], Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 6.
3.126	Baseline / Modelling data	Concerns remain over the baseline/modelling data, scenario and sensitivity testing etc.	MVDC	N/A	Details of the baseline and approach to assessment are detailed in the ES chapter.	ES Chapter 17 Socio-Economics [APP-042]

3.127	Economic Benefits	Concerns remain over the stated national and wider economic benefits of the scheme and the extent to which these are accurate or conflated.	MVDC	N/A	The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].
3.128	Construction related procurement	For construction related procurement GAL should seek to ensure that contractors (including any sub contractors) deliver social value in employment and skills (i.e. contractors/subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff).	ESCC	N/A	Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value).	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.129	CITB national skills academy	Sub-contractors should work to the CITB national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement.	ESCC	N/A	The proposed delivery model in the ESBS is based on the CITB National Skills Academy.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.130	Employment Skills and Business Strategy	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	ESCC	N/A	The ESBS includes specific engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.131	Non- Construction Skills	In non-construction, the option should include upskilling existing workforce.	ESCC	N/A	Upskilling is part of the ESBS.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.132	Social value measures	Ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.	ESCC	N/A	Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value). The ESBS also proposes engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.133	Inward Investment Service and Strategy	We are also keen that GAL uses its unique position in the region to 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)	ESCC	N/A	Inward investment is part of the ESBS.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].

		international trade opportunities with destinations aligned to LGW's route network				
3.134	Baseline data	The baseline data is more than 10 years old in places. There's no read across between the PEIR and Economic Impact Assessment. The employment, supply chain and labour market assessment in the PEIR is based on high-level quantitative data and does not evidence the types of jobs required. Not clear why the Outline Employment, Skills and Business Strategy plan is dependent on the proposed expansion. No reference to the opportunity for growth around international visitor economy, working with local partners and national sector bodies.	WSCC	N/A	A range of data sources have been considered in the baseline depending on the specific indicators being considered and the availability of data at different geographical scales. The latest data has been used where available, with historic data points also included to help assess trends over time. The ES and Economic Impact Assessment use consistent impact areas where appropriate.	ES Chapter 17 Socio-Economics [APP-042] Section 17.5.
3.135	Assessment of the socio-economic impacts	The assessment of the socio-economic impacts has been from a purely 'numbers-based approach', that is, local planning authorities are planning for houses and, therefore, the workers will be provided . However, this excludes analysis of key issues, such as market signals, affordable housing, or constraints on housing supply. Therefore, GAL's approach is considered to be overly simplistic. Fails to take account of the type and quality of employment being generated (unskilled/semi-skilled/skilled) at the Airport and how this translates into the need for different types of housing	WSCC	N/A	A similar comment was made in the Autumn 2021 consultation; GAL's response stated that the Assessment of Population and Housing Effects adopts the same approach as applied in Strategic Housing Market Assessments which are typically prepared for the purposes of plan-making. Following other comments raised on the approach taken to assessing housing effects which were received in the Autumn 2021 and Summer 2022 consultations (and as outlined in GAL's responses), a range of analysis has been added to the Assessment of Population and Housing Effects throughout the process, including analysis of potential affordable housing demand (based on a breakdown of jobs by classification), temporary housing demand during construction, additional commentary on housing trajectory points raised (including past delivery trends and potential impacts of water/nutrient neutrality) and additional detailed outputs at a local authority level.	Appendix 17.9.3 Assessment of Population and Housing Effects [APP- 201].
3.136	Mitigation measures LPAs & communities	There is significant concern regarding the lack of financial support for local authorities and the communities affected. As part of its second runway proposal to the Airports Commission, GAL offered a significant package of financial measures totalling circa £74m to local authorities deliver essential community infrastructure; this included a Home Owners Support Scheme and Local Highway	WSCC	N/A	Discussions will be held with the Local Authorities regarding the legal agreement that will be secured in connection with a Development Consent Order. Community funding and investment is addressed in Section 2.7 of the Planning Statement.	Section 2.7 Planning Statement [APP-245].

		Development Fund, amongst other measures. Therefore, it is questioned why the PEIR only identifies very few mitigation measures for the local authorities and communities adversely affected by the NRP				
3.137	LEP strategies	The strategic documents referenced highlight the LEP strategies and work towards local Industrial Strategies. This work is effectively paused, and a Government LEP review is imminent.	WSCC	N/A	Noted, this position has evolved since the PEIR stage. The LEP strategy and LIS are no longer referenced, and local authority economic development strategies are referred to instead. The ESBS is designed to be flexible by having Implementation Plans that are updated periodically to take account of changes in policy and local organisational structures.	ES Chapter 17 Socio-Economics [APP-042] Table 17.2.3. ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].
3.138	'Study area' and 'labour market area'	The geographies used as the 'study area' and 'labour market area' are muddled and not consistent throughout the various documents – the PEIR has the Local Study Area and the Labour Market Area; the Economic Impact Assessment uses the Gatwick Diamond and C2C LEP area.	WSCC	N/A	The economic impact of the Project in terms of employment and GVA has been assessed on the UK as a whole, as well as on three sub-national areas: the Gatwick Diamond (local authorities close to the airport), a defined Labour Market Area (the relevant labour market area around the airport), and the Six Authorities Area (a whole sub-regional area).	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].
3.139	Study Areas	States that the study areas are cumulative, so wider areas incorporate the smaller areas; therefore, clarity is needed on what is being referenced across all reports.	WSCC	N/A	Clarification is set out in Socio-Economic Chapter, with maps also provided.	ES Chapter 17 Socio-Economics [APP-042] para 17.4.12 and Socio-Economic Effects Figures [APP-052] Figure 17.4.1.
3.140	Trends in the Local Study Area	This chapter refers to trends in the Local Study Area – however, because this area includes the whole of Crawley Borough and only parts of the other local authorities (Horsham, Mid Sussex, Reigate and Banstead, Tandridge and Mole Valley) the overview is skewed. It would be useful if there was more teasing out of the differences amongst those local authorities	WSCC	N/A	See response to row 3.96 regarding the geographies used.	See response to row 3.96 above.
3.141	Trends between the local authorities and the smaller areas of the local study area	There needs to be more around the differences in the trends between the local authorities and the smaller areas of the local study area – as well as the differences in occupations of residents and occupations of workers in the area.	WSCC	N/A	The Socio-Economic Chapter provides data at all geographies where this is available; these are described throughout the Chapter and data is included as an Appendix. This baseline analysis includes analysis of population, economic activity, unemployment, occupation, qualification, earnings, deprivation, employment, commuting and business profile.	ES Chapter 17 Socio-Economics [APP-042] Section 17.6 Baseline and Appendix 17.6.1 [APP-197] Socio-Economic Data Tables [APP-197].

3.142	FE/HE provision	reference to other FE/HE provision in the local study area should be considered – Haywards Heath? East Surrey (Redhill) North East Surrey College - Epsom and Ewell?	WSCC	N/A	The ESBS sets out the overarching strategy for how GAL will engage with stakeholders including FE/HE (Further Education/Higher Education). This will be supported by an Implementation Plan that will provide more detail on that engagement. As it draws up the Implementation Plan, GAL will consult with local authorities on which partners need to be involved.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	
3.143	Growth of Freight	The increase in capacity is also expected to facilitate the growth of freight by 10% in 2029, 27% in 2038/9 and 20% in 2047/48 – is this realistic given that most freight is transported from Gatwick in passenger rather than cargo planes?	WSCC	N/A	The growth in freight is driven by the increased capacity of passenger services primarily on wide body aircraft to long haul markets.	ES Appendix 4.3.1: Forecast Data Book [APP-075].	
3.144	Low value jobs and lack affordable housing	Concerns raised on low value jobs generated through the project and once Runway operational and lack of affordable housing in the area.	RBBC	N/A	See response to row 3.102 above regarding impact on affordable housing provision.	See response to row 3.102 above.	
3.145	Induced effects of construction employment	Induced effects of construction employment - assume there will be an assessment of induced economic activity associated with construction in the ES. Need clarity on reasons for this as typically induced effects are taken account of as part of socio-economic work.	MSDC	N/A	Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic. Wider effects of the construction phase have been assessed in terms of potential impacts on the construction supply chain measured relative to the scale of construction sector enterprises (as opposed to employment which is used for direct effects only) in each of the assessment areas.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]. Section 17.9 of ES Chapter 17: Socio-Economic [APP-042].	
3.146	Labour supply	Labour supply - SE lower than average share of workers in infrastructure and because of decline in infrastructure output there is unlikely to be a shortage in labour supply. Given large proportion of Gatwick jobs are likely to require skills which are interchangeable across several industries and based on projected increase in total output, this would suggest local labour available for scheme maybe more limited.	MSDC	N/A	ES Chapter 17: Socio-Economics provides an assessment of the Project's effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.	ES Chapter 17 Socio-Economic [APP-042]. ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	

3.147	New construction labour	New construction labour - Assumption that there will be new entrants to construction, is the applicant going to be identifying where these entrants will be coming from. Not specific about where these are coming from. No analysis of existing skills in local areas has been undertaken to inform this analysis	MSDC	N/A	There will be new entrants in all labour market sectors over the next seven years. These (broadly) will come from the same places as where existing workers live (ie existing towns and cities). The spatial distribution of those workers is set out in ES Appendix 17.9.1. This is specific to the existing construction skills in the local area.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].	
3.148	Population and Housing Report	Population and Housing Report - Impact on housing does not take full account of increased pressure on temporary accommodation created by migration. This is too large to capture impacts at a local authority level. How will local authorities understand the extent of impacts on their areas?	MSDC	N/A	To determine the potential housing effects, the number of NHB workers (ie those who will temporarily migrate to the area) allocated to each local authority area has been compared with the total number of bed spaces available in the private rented sector. Table 6.1.1 of ES Appendix 17.9.3 sets out the distribution of NHB construction works (at peak) within the key authorities. In MSDC, it is expected that there would be six NHB workers requiring temporary accommodation within the district. Represented as a proportion of total bed spaces in MSDC, this accounts to 1.41%.	ES Chapter 17 Socio-Economic [APP-042]. ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].	
3.149	Population and Housing Report	Population and Housing Report - What data sources are being used to assess hotel, B+B and temporary accommodation capacity	MSDC	N/A	Lichfields undertook primary research, splitting them into three broad categories – on-airport, off-airport in close proximity (ie within 15 minutes), and off-airport (up to 30 minutes away).		
3.150	Gravity Model testing / calibrating	Gravity Model testing/calibrating and Results - 100% home based theoretical example assuming all construction workers are home based (90 mins). Theoretical breakdown of where these would be based. Gravity model captures distribution of construction work force. It is not clear how numbers have been split by locality, types of workers based in different localities and whether there would be sufficient supply of labour to fill these positions	MSDC	N/A	The approach to developing the Gravity Model is set out in Section 4 of ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note. Table 5-2 sets out the distribution of home based workers across the local authority areas. This is based on both the number of construction workers who live there and the distance from the site.	ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note [APP-199].	
3.151	Demand by occupations	Demand by occupations - sets out potential demand for occupations from project. No further information about where potential employees for these occupations would reside. Have info by LA in other places so why not here.	MSDC	N/A	The Gravity Model uses data on all construction workers at local authority level. Occupations are not sufficiently disaggregated at that spatial scale.	ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note [APP-199].	
3.152	Travel to work data	Travel to work data is pre – covid. Based on GAL's update, it confirms that the extent to which Covid-19 implications have not been	MSDC	N/A	The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions		

		considered and that no update of the data will be made prior to submission. Suggest that GAL should be updating TWT data.			are expected to rebound to pre-pandemic levels before the Project's commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability. There is no evidence that Covid has changed the spatial distribution of travel to work patterns. It has changed the frequency with which some occupations attend their place of work or work from home. Many roles at Gatwick cannot be done from home so these would not be affected by such changes. The Employer Survey therefore remains the most robust means of estimating travel patterns.	
3.153	Study areas	We understand what the applicant's study areas are but don't fully agree with the rationale for selecting these study areas. The applicant has not considered sensitivities or capturing impacts at individual local authority level. Therefore, this assessment falls short in identifying how the scheme will impact on receptors within specific local authorities. At the minimum, why is it not possible for the applicant to focus on an assessment of effects for those local authorities in close proximity to the scheme?	MSDC	N/A	ES Chapter 17: Socio-Economics provides an assessment of the potential socio-economic effects of the Project, including effects on employment and the labour market. economic activity We have explained the approach to assessment at TWGs. The assessment focuses on the five defined study areas, but also provides employment estimates at the Local Authority level. Detailed data on economic activity at the local authority level is contained ES Appendix 17.6.1: Socio-Economic Data Tables, namely Tables 2.1.5 and 2.1.6.	ES Chapter 17 Socio-Economics [APP-042].
3.154	Induced effects of construction employment	Assessment of induced effects of construction employment - In the workshop, Applicant said it didn't make sense to do this. We will need further clarity on the reasons for this as typically induced effects are taken account of as part of socio-economic assessment work.	MSDC	N/A	Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic. Wider effects of the construction phase have been assessed in terms of potential impacts on the construction supply chain measured relative to the scale of construction sector enterprises (as opposed to employment which is used for direct effects only) in each of the assessment areas.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]. Section 17.9 of ES Chapter 17: Socio-Economic [APP-042].
3.155	Availability of construction workers	The applicant confirmed that the analysis on the availability of construction workers	MSDC	N/A	Baseline analysis of the current labour market in the local area has been completed within the SE	ES Chapter 17 Socio-Economics [APP-042]

		considered the split by local area. However, there is no breakdown provided of where different workers are based locally and no further details have been provided on this. As such it remains unclear how this work links into the socio-economic assessment. In conclusion, it is difficult to understand whether there is currently an available pool of workers in the local areas to meet the employment demand from the scheme and whether there will be constraints placed on local labour supply. With regards to new entrants to construction, is the applicant going to be identifying where these entrants will be coming from?			Chapter, including analysis of population, economic activity, unemployment, occupation, qualification, earnings, deprivation, employment, commuting and business profile. The future baseline (including working age population and labour supply) is also set out. These inform the assessment of effects, which include effects on employment, the labour market, business disruption and business displacement. There will be new entrants in all labour market sectors over the next seven years. These (broadly) will come from the same places as where existing workers live (ie existing towns and cities). The spatial distribution of those workers is set out in ES Appendix 17.9.1.	Section 17.6 Baseline Conditions and Section 17.9 Effects ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]
3.156	Construction workers	At a previous workshop there was a presentation of a theoretical exercise with an assumption that 80% of construction workers were home based (within 90min of the airport) and 20% were non-home based (NHB). The applicant confirmed that the 20% NHB assumption was informed by the Gatwick construction team – function of the contracting (contractors for some of those things will come from other parts of the country). They argued that there is a lot of construction workers and specialists living in the area given the location of Gatwick - unlike Hinckley Point, for example, which had a NHB worker ratio of 64% (highly specialised infrastructure and located in a rural area). It is still not entirely clear that this assumption is based on actual evidence/data and it would be helpful if this were confirmed. At the minimum, and alongside the information from the construction team, we would have thought the applicant could demonstrate some appropriate comparators to further justify the 20%.	MSDC	N/A	This is explained in the Gatwick Construction Workforce Distribution Note. The average proportion of non-home based workers in England is 5% and in the South East is 7%. Based on GAL's experience of major construction, a higher % was tested because of the specialist areas of work required and the need to contract for these workers nationally rather than regionally. This therefore tests a higher impact on local accommodation markets.	Section 4.1 of ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]
3.157	Infrastructure labour	The applicant confirms that they are not projecting that the supply of infrastructure labour will fall but that the CITB is projecting demand for infrastructure labour to fall. The point made by AECOM on Slide 52 from the previous presentation, that whilst the	MSDC	N/A	This is an infrastructure project, so the supply of infrastructure labour is most relevant. To the extent that other types of construction workers could have relevant skills that would increase the supply of available labour. Appendix 17.9.1 is	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]

		projection for infrastructure output is showing a decline, the “total” output (last row in the table) is showing an increase over the same period. The applicant’s response does not address this question. Given the nature of the skills required for the Gatwick scheme, the majority would be applicable across multiple sectors, not just infrastructure. Therefore, it is questionable whether the demand of labour relevant to the Gatwick scheme will actually fall as suggested in Slide 52 (previous presentation).			based on all construction workers, not just those in infrastructure.	
3.158	Gravity Model	Distribution of construction workforce by local authority has been captured through a Gravity Model (function of labour supply by travel zone and distance from the site). The model distributes/allocates workers between the zones based on distance alone. It is not clear how this distribution between each zone is made. The use of distance from the site as primary criteria for allocation of construction workforce seems very simplistic and would assume that all zones in the 90-min area have a similar proportion of construction workforce. This is unrealistic and there needs to be a further granular assessment	MSDC	N/A	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note sets out the technical detail behind the Gatwick Gravity Model (GGM). It explains the inputs into the GGM, the estimated distribution of workers by Local Authority (LA) and the robustness checks undertaken. The distribution between each zone is based on its distance from the site and the number of workers who live there. The Gravity Model uses distance because it draws on a dataset of construction worker travel patterns which is itself distance-based.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] Section 6.1.
3.159	Magnitude of impact	Due to the number of receptors, phases and impact areas, the applicant has opted to assess magnitude of impact based on set thresholds. These thresholds are not informed by guidance but decided by the applicant and are similar across all receptors, phases and impact areas: <ul style="list-style-type: none"> • Up to 1% change: very low magnitude of impact • 1% to 7.5% change: low magnitude of impact • 7.5% to 15%: medium magnitude of impact • Over 15% change: high magnitude of impact This approach appears very simplistic. Whilst we do appreciate the high number of assessments that will be needed, applying the same thresholds to all receptors skew the analysis. For instance, we would expect an	MSDC	N/A	As shown in ES Chapter 17 Socio-Economics, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment, however proposed thresholds were presented during Topic Working Groups for comment.	ES Chapter 17 Socio-Economics [APP-042] Table 17.4.5-6

		increase of 5% in housing demand to be high, not low. On the other hand, an increase of 5% in access to sport, leisure facilities and open space may be considered as low.				
3.160	Study areas of socio-economic assessment	From what we understand, the study area for the socio-economic assessment is the Labour Market Area. This is too large a study area to appropriately capture impacts at a local authority level. How will local authorities (particularly those in close proximity to the scheme) understand the extent of impacts on their areas?	MSDC	N/A	<p>Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023</p>	ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197]
3.161	Outputs for population, housing, jobs and labour supply	We understand that outputs for population, housing, jobs and labour supply will be presented for each scenario at local authority level in an appendix to the Population and Housing Report. There is mention of local pinch points, with that in mind can you clarify to what extent there will be interpretation and analysis of these outputs at a local authority level particularly for those authorities located in close proximity to the scheme. Can you also confirm how will this be taken account of to inform the socio-economic assessment given this is being undertaken at a larger study area level. Could you also confirm the extent to which you have engaged with local authorities to inform these outputs?	MSDC	N/A	<p>ES Appendix 17.6.1: Socio-Economic Data Tables contains the outputs that have informed the socio-economic assessment. This includes presentation of the outputs at a local authority level. The evaluation of this data is set out in ES Chapter 17 Socio Economic.</p> <p>A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023.</p>	<p>ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197]</p> <p>ES Chapter 17 Socio-Economic [APP-042]</p>
3.162	Temporary accommodation	Additionally, the impact on housing does not appear to fully take into account the increased pressured on temporary accommodation created by migration. This is a particular issue in some of the local authorities which currently	MSDC	N/A	To determine the potential housing effects, the number of NHB workers (ie those who will temporarily migrate to the are) allocated to each local authority area has been compared with the total number of bed spaces available in the private	<p>ES Chapter 17 Socio-Economic [APP-042].</p> <p>ES Appendix 17.9.3 Assessment of</p>

		have a very high number of people in temporary accommodation / hotels, with current provision low due to high pressure from migration which will place constraints on this type of accommodation. Given migration is projected to accelerate this may go beyond being a temporary constraint.			rented sector. Table 6.1.1 of ES Appendix 17.9.3 sets out the distribution of NHB construction works (at peak) within the key authorities. In MSDC, it is expected that there would be six NHB workers requiring temporary accommodation within the district. Represented as a proportion of total bed spaces in MSDC, this accounts to 1.41%.	Population and Housing Effects [APP-201].	
3.163	Data sources	please could you clarify what data sources are being used to assess hotel, B&B and temporary accommodation capacity	MSDC	N/A	Lichfields undertook primary research, splitting them into three broad categories – on-airport, off-airport in close proximity (ie within 15 minutes), and off-airport (up to 30 minutes away).		
3.164	Outputs at LPA level	We understand the applicant will present the outputs for the HMA (but not LPA area, as there are too many of them) at next meeting. Outputs at LPA level will be calculated but won't be shared with LPAs before the DCO submission. Whilst presenting all outputs for all 17 authorities is helpful, there is a need to demonstrate that key issues/pinch points/constraints within local authorities are sufficiently taken account of particularly those authorities in close proximity to the scheme. Please can you clarify how you will provide reassurance that locally specific issues within these areas have been appropriately taken account of.	MSDC	N/A	A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023.	ES Chapter 17 Socio-Economic [APP-042]	
3.165	ARELS	ARELS said that airport-related land requirement to 2038 is in the order of 16-17 hectares in the base case scenario, increasing to 35-39.5 hectares with the Northern Runway. Therefore, 19 to 22.5 hectares of airport related land requirement is attributable to the Northern Runway. Slide 45 then states that of the 19-22.5 ha, around 15-18 ha could be attributed to off-airport requirement, equivalent to less than 1 ha per annum potentially across the ARELS FEMA. It is unclear how it was estimated that 15-18ha could be attributed to "off-airport" requirement and what "off-airport" means. The airport-related land requirement will cater for hotels, industry and warehousing (cargo, freight,	MSDC	N/A	The ARELS work has been completed. The study has assessed land supply implications associated with identified growth – consideration has been given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration has been given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS has assessed the total quantum of future airport-related space. GAL would be happy to discuss the ARELS work with the authorities; however, it should be noted that the ARELS has not assessed suitability or deliverability of the land identified by local authorities (i.e. where space should be located). Growth as a result of the NRP		

		<p>airline catering, maintenance, distribution and logistics) as well as office. It would therefore be reasonable to assume that all that land requirement will be needed in immediate proximity of the airport. Therefore, there would still be a requirement to deliver 35-39.5 hectares of airport-related land in and around the airport by 2038 (and not 15 to 18 ha within the entire FEMA as slide 45 seems to suggest). Slide 46 suggests that one of the next steps will be to verify whether there is a current and forecast surplus or shortfall in space, identified employment land allocations and the availability at certain sites within the FEMA. This verification should be done at a more local level, where land will be required (rather than the FEMA level). As well as making the identification of suitable land more challenging, the concentration of activities around the airport will result in a concentration of the impact more locally (note: partially included but not specific issue).</p>			<p>will emerge over a long period of time and will to a large extent be indistinguishable from background changes in land use patterns. Businesses serving the airport or its supply chains, or those that use it as passengers will have the opportunity to grow and some of that will mean they need to expand. How and where they do that will be a matter for them and their ability to either find premises or get planning consents to accommodate that growth. It would be spurious to seek to estimate with any precision how space should be provided and where it should be located.</p>		
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Table 4: Planning Baseline Projects

1.1.1 The below issues relate to the consideration of specific developments within the baseline scenario. The GAL response confirms how each of the listed developments have been treated with respect to the baseline scenario.

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
4.1	Future Baseline Projects	Gatwick Rail Station Expansion Development (South Terminal) (Category 1)	JLAs	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.10 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.2	Future Baseline Projects	Pier 6 Western Extension (North Terminal) (Category 1)	JLAs	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.2 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.3	Future Baseline Projects	Echo Romeo Rapid Exit Taxiway Runway 23 (Category 1)	JLAs	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.4 of ES Chapter 4 Existing Site and Operation (APP-029)	
4.4	Future Baseline Projects	Hilton MSCP (South Terminal) (Category 1)	JLAs	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.6 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.5	Future Baseline Projects	Electric Vehicle Charging Forecourt (South Terminal) (Category 2)	JLAs	Category 2 Development which although not under construction has a planning permission including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.8 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.6	Future Baseline Projects	Multi Storey Car Park 7 (North Terminal) (Category 3)	JLAs	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.6 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.7	Future Baseline Projects	Robotic Car Parking (South Terminal) (Category 3)	JLAs	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.6 of ES Chapter 4 Existing Site and Operation [APP-029].	

4.8	Future Baseline Projects	South Terminal Welcome Roundabout - minor highway works within the highway boundary (Category 3)	JLAs	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.		Para 4.4.9 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.9	Future Baseline Projects	North Terminal Welcome Roundabout - minor highway works within the highway boundary (Category 3)	JLAs	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	N/A	Para 4.4.9 of ES Chapter 4 Existing Site and Operation [APP-029].	
4.10	Capacity/ utilisation (baseline)	It is noted that the number of annual aircraft movements at Gatwick plateaued in the period 2017-2019 at c.285,000 annual aircraft movements. The DCO single runway baseline is cited as 318,000 aircraft movements, a 12% increase in aircraft movements. This would suggest that GAL envisages being able to accommodate growth in demand beyond current levels without the NRP.	JLAs	LGW, capacity utilisation today (2019/2023): <ul style="list-style-type: none"> In the summer season, LGW operates at capacity during the core hours of the day and in the night period. Demand significantly exceeds capacity as per slot applications of airlines Any notable capacity that has become available in recent years has been taken up (e.g. through new slot transactions) and trading in slots demonstrates excess demand. Today, GAL is not able to accommodate all the demand from airline customers or new entrants 	N/A	ES Appendix 4.3.1 Forecast Data Book [APP-075].	
4.11	Capacity/ utilisation (baseline)	There are proposals to increase capacity at a number of London airports, including London City, London Luton and Stansted (expanded terminal infrastructure). It also remains Government policy under the Airports National Policy Statement that a third runway should be constructed at Heathrow.	JLAs	LHR/LTN are operating at or very close to their planning caps. Apart from STN (which requires some development to support), very limited capacity exists in the LON airport system.	N/A	ES Appendix 4.3.1 Forecast Data Book [APP-075].	

4.12	Future Baseline Projects	HDC has requested that GAL share the two elements of the Future Baseline (Future Air Traffic Forecasts and Future Baseline Developments) before submission of the DCO application.	HDC	N/A	Both elements were fully set out in the PEIR and are now set out in the Forecast Data Book (APP-075) and in ES Chapter 4 (APP-029).	ES Chapter 4 Existing Site and Operation [APP-029] and ES Appendix 4.3.1 Forecast Data Book [APP-075].	
4.13	Need Case, Demand Forecasts and Capacity Assessments	Lack of information and clarity re: Need Case, Demand Forecasts and Capacity Assessments and a number of other issues being requested by York Aviation, on behalf of the local authorities, since Autumn 2021 and which are still to be fully addressed to the satisfaction of the local authorities.	HDC	N/A	<p>These matters are fully set out in the application documents. Outstanding issues on matters raised by York Aviation are the subject of the draft Statement of Common Ground.</p> <p>GAL will continue the SoCG engagement but, if issues remain after the authorities have fully digested the application – and these are matters of principle, they will have to be examined in the normal way.</p>	Needs Case [APP-250] and ES Appendix 4.3.1 Forecast Data Book [APP-075].	
4.14	Need case	Further information and justification of the approach to the Associated Development and the need for and provision of additional hotel and office space as part of the Project (and what is needed for development outside of the DCO). In the Planning TWG 4 held on 23/11/22 GAL's slide deck indicated that "the delivery of new hotels and offices is not necessary as a source of additional revenue for the applicant". However, when HDC queried this, GAL confirmed that these new facilities would result in additional revenue for	HDC	N/A	The fact that new commercial premises will be let on commercial leases is normal and should not be a matter of concern. The premises are not proposed principally for that purpose. The submitted application material (at APP-028 and APP-029) explains why additional hotel and office accommodation is needed as the airport grows.	Section 3.6 of ES Chapter 3 Alternatives Considered [APP-028], ES Chapter 4 Existing Site and Operations [APP-029] and Section 5.2 of ES Chapter 5 Project Description [APP-030].	

		GAL through commercial leasing arrangements. Greater clarity around all of these issues is required.					
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Table 5: Transport

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
5.1	Transport Strategy	At a high level, we still do not feel that we're having our concerns answered in respect of fundamentals around GAL's transport strategy and the surface access proposals that are coming out of that. It still seems as though the strategy of providing for forecast growth is dictating the transport solution and, given that the current demand is primarily car based, that will be the future profile. We still need to see greater detail around the intended Passenger Transport options, including rail and long-distance coach	JLAs	We are committed to increasing the share of journeys made by sustainable modes. However, private car use will continue to be an important consideration in our access proposals. Our strategy takes account of all forecast trip-making, both for the airport and for non-airport journeys. Our modelling methodology allows us to assess the impact of growth in airport related car trips, albeit at a lower mode share, alongside non-airport background growth. This is being used to determine the need for improvements to the road layout. Our proposed highway design provides the level of enhancement required for forecast road traffic up to 2047 allowing for a shift to sustainable modes. We will set out further thinking on bus and coach improvements in future Topic Working Groups and will provide full details in the DCO submission.	The Surface Access Commitments document sets out the commitments around bus and coach services. The Transport Assessment sets out how these interventions are included in the modelling to inform the assessments by mode.	Chapters 3, 9, 10, 11 and 14 of the Transport Assessment [APP-258] Section 4 of ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.2	Modal Split Targets	We have requested more challenging modal split targets and will be interested in the scenario testing around this	JLAs	We will provide further information regarding mode split targets along with our analysis of transport model outputs in coming months. GAL believes it's targets are already challenging and exceed those put forward by other UK airports seeking to grow. It is important that the targets are realistic and achievable, based on sound analysis.	The Surface Access Commitments document sets out mode share commitments for the Project to be achieved by three years after the commencement of dual runway operations and annually thereafter., as well as future aspirational mode shares targets which indicate GAL's longer-term goals.	Sections 4 and 7 of ES Appendix 5.4.1: Surface Access Commitments [APP-090] Annex B: Strategic Transport Modelling Report of the Transport Assessment [APP-260].	
5.3	Car Parking	We noted that the net increase parking totals now appear lower than implied in statutory consultation - an additional 4,200 for the Northern Runway growth in passenger numbers? This prompts some queries around the relationship between these figures and the level of change proposed to the road network. We query whether as GAL has no control over off airport unauthorised spaces, additional spaces should be provided based on the assumption that unauthorised spaces will	JLAs	This is correct, our proposals for net additional spaces for Northern Runway Project is 4,200 spaces, including on-airport provision to balance the loss of unauthorised off-airport spaces. This is also set out in our Summer 2022 Consultation, which asks for views on this approach. Additional passenger parking demand from the Northern Runway Project is only one of several contributors to road traffic. Passenger parking spaces are occupied for around 10 days on average and so one space typically generates an arrival and departure trip only once every 10 days. This compares with daily drop off/pick up airport trips,	Chapter 2 and Table 2.4.1 of the Transport Assessment describe the car parking provision for the Project. The Project would result in a net increase of up to 1,100 car parking spaces.	Chapter 2 of the Transport Assessment [APP-258] Section 5.2 [para 5.23.83 onwards] of the ES Chapter 5: Project Description [APP-030]	

		be taken out of circulation. We noted that parking that might be granted with associated developments, such as hotels and offices, has not been included in totals.		taxi journeys and background non-airport journeys which make up a larger proportion of daily trips and therefore have a greater impact on the required road capacity. No additional parking will be offered with new offices included within the Northern Runway Project. Proposals for new hotels assume a ground lease of a certain area and while prospective hotel providers may propose limited ground floor parking underneath a hotel building above this would be a commercial decision for them. Only limited additional spaces could be created in this way and restrictions on the height of the building (associated with aerodrome safeguarding) means ground floor parking would reduce the space available for hotel rooms or other facilities.			
5.4	Active Travel	We would like to see more linkages for active travel coming out of South Horley, directly into North Terminal, and using the public rights of way either side of the main London to Brighton railway line from Horley into the South Terminal and station.	JLAs	Topic Working Group 2 set out thoughts on active travel links, particularly between Horley and the airport. We have also set out our approach to managing active travel routes during construction.	Section 14.4 of the Transport Assessment sets out the walking and cycling improvements proposed as part of the Project. In particular, improvements around North Terminal and Longbridge Roundabout will improve permeability and linkages.	Section 14.4 of the Transport Assessment [APP-258].	
5.5	Active Travel	Slide 8 of TWG 1 mentions that highway network effects will include flows and performance across the Strategic Road Network – will roads on the local road network also be included?	JLAs	We will provide flows and other model outputs for relevant links and junctions throughout the local network and on the strategic road network.	Annexes B and C of the Transport Assessment provide the outputs of the strategic and VISSIM modelling respectively, which are discussed in Sections 12 and 13 of the Transport Assessment.	Section 12.9 of ES Chapter 12: Traffic and Transport [APP-037]. Chapters 12 and 13 of the Transport Assessment [APP-258] and Annex B [APP-260] and Annex C [APP-261] of the Transport Assessment	
5.6	Active Travel	Slide 17 of TWG 1 mentions that engagement with Local Highway Authorities is ongoing – what is the programme for these engagements, and can these involve National Highways given that the proposed highway improvements will directly affect all four highway authorities (NH, WSCC, SCC, GAL)?	JLAs	GAL has a MoU covering its engagement with National Highways, which covers a number of areas for discussions, some of which should remain bilateral. We have also met with representatives from West Sussex CC and Surrey CC in relation to both our concept design and modelling approach. We anticipate these meetings will continue through to DCO submission and will support a Statement of Common Ground with each party.	N/A	Section 12.3 of ES Chapter 12: Traffic and Transport [APP-037] sets out a summary of consultation and engagement.	
5.7	Active Travel	Slide 24 of TWG 1 mentions that parking charges for passengers are being tested in the model – why not test the effect of	JLAs	Our model is testing different options for constraining staff parking as well as passenger parking. This considers both pricing and availability since we have	N/A	Chapter 6 of the Transport Assessment [APP-258].	

		applying parking charges for employees to encourage them to use sustainable modes?		different approaches that we could take and greater flexibility on incentives for sustainable travel, particularly for those living closest to the airport.		Commitments 11 and 12 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]. Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037].	
5.8	Coach Strategy	Slide 25 of TWG 1 lists 6 new coach routes – how have these coach routes been identified and what market testing has taken place (or is planned)?	JLAs	We will provide further detail on the approach to increasing public transport mode share in the next Topic Working Group. The choice of routes is plotted against areas where there are significant numbers of people travelling to Gatwick but currently a relatively low public transport mode share. The higher number of people means there is a greater chance of sustaining a viable service in the future. We have excluded areas already served by frequent, direct rail links as these would be more attractive than bus/coach.	The proposed bus and coach routes are set out in Section 5 of the Surface Access Commitments. The commitments provide funding for the routes identified, or others which result in an equivalent level of improved public transport accessibility.	Paragraphs 5.2.1 and 5.2.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]. Section 11.3 of the Transport Assessment [APP-258].	
5.9	Local Bus Enhancements	Slide 26 lists bus service frequency enhancements – how have these been identified and what market testing has taken place (or is planned)?	JLAs	A similar approach has been taken for local bus services, improving connectivity and frequency in order to stimulate a higher mode share, where there are considerable number of staff trips but public transport is not achieving the share we would like to see.	The proposed bus and coach routes are set out in Section 5 of the Surface Access Commitments. The commitments provide funding for the routes identified, or others which result in an equivalent level of improved public transport accessibility.	Paragraphs 5.2.1 and 5.2.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]. Section 11.3 of the Transport Assessment [APP-258].	
5.10	Car Parking Strategy	Parking – how will the revised parking proposals support the achievement of the sustainable transport mode share targets?	JLAs	By limiting the number of additional spaces provided we are decreasing the number of spaces available per million passengers. We are also increasing the cost of on-airport parking and forecourts relative to other modes. Because GAL does not control the pricing and supply of all parking (only on-airport parking) there is a balance to be struck so that passengers don't choose off-airport parking, rather than shift to sustainable modes.	N/A	Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.11	Surface Access Mitigations Strategy	As GAL will be aware, we raised a number of comments in relation to Traffic and Transport issues and at this stage it is difficult to see how GAL is planning to respond to this feedback. Much of the	JLAs	The area on and immediately around the airport sees the greatest impact as a result of the Northern Runway Project and it is important that our mitigation is acceptable to National Highways and the Local Highway Authorities. We are studying the wider	Chapter 12 of the Transport Assessment discusses the strategic highway model outcomes and Annex B which provides the more technical Strategic Transport Modelling Report. Section 12.9 of ES Chapter 12: Traffic	Chapter 12 [APP-258] and Annex B [APP-260] of the Transport Assessment .	

		focus for the discussions on Surface Access mitigation is on the immediate impact on and around the Airport, with little acknowledgement of the wider transport impacts beyond the immediate airport. GAL is projecting a significant uplift in passenger throughput which will have implications for travel within the District, particularly given the potential for in combination effects as a result of planned and potential further development. For example, the A264 is an important east-west route connecting Horsham with Crawley, the A24 to the west and the M23 to the east, and forms an important part of the road network providing forward destination links to and from the Airport.		transport impacts and have explicitly covered a wide area in our transport model for this purpose. This includes the routes mentioned. All A-roads, all B-roads and most C-roads within 25-30 kilometres of the airport along with unclassified roads close to the airport are included in the highway model. These models are being analysed to determine if specific mitigation is required at other locations and, should this be the case, details will be shared with stakeholders. We continue to develop potential improvements for public transport and active travel that will help to reduce the impacts of road traffic.	and Transport sets out the assessment of environmental effects including those influenced by traffic.	Section 12.9 of ES Chapter 12: Traffic and Transport [APP-037].	
5.12	Impacts on wider transport network	The Council would therefore like to understand, in detail, what work is being undertaken on understanding the impacts on the wider transport network beyond the immediate airport boundary and when and how these findings will be shared and discussed with the local authorities. The Council also wishes GAL to note that we have presented concerns for potential impacts on the A264 in this response as one example, however, these concerns can equally be applied to other important A roads in the District, including the A24, A29, A272 plus rural routes, which we know suffer from rat running as those travelling to and from the Airport look to avoid congestion on main routes.	JLAs	Our transport models provide detail of the change in traffic flow and speed on the network, allowing comparison of the existing network with and without background growth (i.e. the existing network, with committed improvements but with no Northern Runway Project) and between the future baseline and with the project. This allows us to compare the operation of the existing network against the incremental change with the project, including our highway proposals. This analysis uses planning data for developments provided by the LPAs. The models cover a wide area and include all the routes mentioned. We also have a modal choice model that includes local bus routes, coach services to and from the airport and the regional railway network for the South East. We are therefore able to present changes resulting from the Northern Runway Project on all travel routes across a wide area and separate these effects from background levels that would occur without the project.	Chapter 12 of the Transport Assessment discusses the strategic highway model outcomes and Annex B provides the more technical Strategic Transport Modelling Report. Section 12.9 of ES Chapter 12: Traffic and Transport sets out the assessment of environmental effects including those influenced by traffic.	Chapter 12 [APP-258] and Annex B [APP-260] of the Transport Assessment . Section 12.9 of ES Chapter 12: Traffic and Transport [APP-037].	
5.13	Car Parking Strategy	At this stage, it is difficult to comment effectively in the absence of a detailed and robust Car Parking Strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project (NRP). A Car Parking Strategy would also need to be	JLAs	We have set out our proposals to reduce the amount of car parking provided per million passengers both with and without the project. Our current proposals assume only 4,200 net, additional spaces to cater for Northern Runway Project growth. This assumes that we will increase the efficiency of how we use spaces during the year (noting that overall capacity is related	Chapter 2 and Table 2.4.1 of the Transport Assessment describe the car parking provision for the Project. The Project would result in a net increase of up to 1,100 car parking spaces.	Chapter 2 and Table 2.4.1 of the Transport Assessment [APP-258] Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport	

		intrinsically linked to the Transport and Sustainability Strategies for the Northern Runway Project. Currently, the parking proposals lack any robust justification for the number of spaces. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal shift aspirations will be achieved.		to our summer peak period). The number of spaces reflects a gradual reduction in parking mode share, assisted by proposals to increase parking charges and improve public transport provision. Our transport models include measures to attract people to sustainable modes and this will be used to develop our mode share targets. A Parking Strategy and Surface Access Strategy will be prepared and included in the DCO. Further information will be provided on mode share targets in future Topic Working Groups.		[APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.14	Car Parking Strategy	The Council has had regard to the 2019 Annual Parking Survey that the local authorities adjacent to the airport jointly undertake (the 2019 Survey being the most recent pre-pandemic survey). At the time, this Survey identified that there were 16,508 vacant authorised spaces in total (with 12,070 spaces on-airport and 4,438 authorised spaces off-airport). Additionally, the Parking Survey found that there were 6,644 unauthorised spaces.	JLAs	Through our Section 106 commitments GAL will continue to ensure that all parking capacity for airport growth is provided on-airport, as the most sustainable location for these trips.	N/A	Section 5.2 [para 5.23.83 onwards] of the ES Chapter 5: Project Description [APP-030] Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.15	Car Parking Strategy	The Council considers that these findings demonstrate that, despite the large provision of authorised spaces available to airport users, unauthorised car parking facilities still exist. The approach of solely providing additional car parking at the Airport fails to properly consider other important factors, such as the implications of pricing in the choices airport users make, again something which could be addressed in a robust Car Parking Strategy. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking and all such facilities should be convenient, safe and secure and priced to make illegal off-airport parking less attractive.	JLAs	GAL seeks to strike a balance between providing sufficient capacity on airport whilst also promoting a reduction in parking demand without this demand migrating to off-airport parking. Note, if on-airport parking becomes less attractive past evidence indicates many passengers will choose other places to park or shift to taxis and pick up/drop off before changing to public transport.	The policy towards authorised off-airport parking, and the enforcement of unauthorised off-airport parking are matters for local authorities. GAL supports the current policies of local authorities that any increase in airport-related parking should take place on-airport as the most sustainable location but that this provision should be consistent with GAL's approach to promoting an increase in the use of sustainable modes. The Surface Access Commitments document submitted with the DCO sets out our proposal to support local authorities with the management and enforcement of off-airport parking and traffic issues.	Section 5.2 [para 5.23.83 onwards) of the ES Chapter 5: Project Description [APP-030] Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.16	Car Parking Strategy	As currently presented and in the absence of a cogent approach to the	JLAs	GAL has provided an updated approach to parking on-airport and we have set out proposals to limit the	N/A	Section 5.2 [para 5.23.83 onwards) of the	

		provision of car parking facilities for the NRP, it is difficult for the Council to effectively comment on the most appropriate requirements to serve the development and provide the optimum solution for minimising the negative impacts of unauthorised parking in the district.		number of additional spaces provided, alongside measures to attract people to sustainable modes. GAL will continue to support LPAs exercise their powers to limit off-airport parking.		ES Chapter 5: Project Description [APP-030] Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.17	Coach Strategy	The consideration of a Coach Strategy and the assessment of high frequency routes, including a route from Worthing through Horsham is welcomed. Can GAL please provide more details on what this assessment encompasses and how it is being undertaken. The Council is assuming that routes are being tested through the provision of temporary coach services. If this is the case, can GAL please confirm how these routes are being promoted to attract travellers.	JLAs	We will provide further detail on the approach to increasing public transport mode share in the next Topic Working Group. The choice of routes is plotted against areas where there are significant numbers of people travelling to Gatwick but currently a relatively low public transport mode share. The higher number of people means there is a greater chance of sustaining a viable service in the future. We have excluded areas already served by frequent, direct rail links as these would be more attractive than bus/coach. We have not developed a marketing strategy for these routes, it is far too early to do so. Our analysis of how popular they would be is based on the modelling undertaken for the project.	Chapter 7 of the Transport Assessment and Section 5 of the Surface Access Commitments documents describe the coach routes assumed in the modelling work and the commitments GAL is making to them.	Chapter 7 of the Transport Assessment [APP-258] Commitment 5 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.18	Coach Strategy	It would be helpful if GAL could also advise what assessment of the success (or otherwise) of the schemes is being undertaken. We are keen to understand the findings of the assessment and potential outcomes. Additionally, it would be helpful to understand if sections of the routes are being assessed and what this may mean for delivery of coach services, e.g. if part of a route was underused, but uptake of the service increased at a certain point, what implications would this have for the viability and provision of the route.	JLAs	The detailed analysis of the routes is still being developed but we will be able to provide further detail in future Topic Working Groups. In all cases we expect the introduction of these routes to require commercial negotiations between GAL and service providers to ensure the services are given the best chance of success. This may require services to be adapted over time to best represent the needs and behaviour of passengers	Chapter 7 of the Transport Assessment and Section 5 of the Surface Access Commitments documents describe the coach routes assumed in the modelling work and the commitments GAL is making to them. Section 6 of the Surface Access Commitments document describes the proposed approach to monitoring progress.	Chapter 7 of the Transport Assessment [APP-258] Commitment 5 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.19	Local Bus Enhancements	It is noted on slide 24 that GAL is “testing a series of upgrades to existing local bus services”. Can GAL please expand on this and identify if any upgrades are being tested and could be delivered within	JLAs	Further information will be provided in the next Topic Working Group. The modelling considers passengers’ choice of all modes, which is based on relative journey times compared with other modes. In the case of Horsham rail services provide considerably	Chapter 7 of the Transport Assessment and Section 5 of the Surface Access Commitments documents describe the coach routes assumed in the modelling work and the commitments GAL is making to them.	Section 7.3 of the Transport Assessment [APP-258]. ES Appendix 5.4.1:	

		Horsham District. It would be helpful to understand if a collaborative approach is being undertaken for this work, i.e. to work with developers and bus companies to consider a more strategic approach to the provision of services.		quicker journeys than local bus services and as a result, the models indicate that new or enhanced bus services would not attract sufficient passengers and would therefore be unsustainable.		Surface Access Commitments [APP-090].	
5.20	Local Bus Enhancements	The Council notes on slide 26 that no local bus enhancements have been identified for routes travelling from anywhere in Horsham District to the Airport. The Council considers this to be a missed opportunity and we would like to receive, in writing, justification why GAL has chosen not to identify enhancements for bus services within the District, particularly given the proximity of the District to the Airport.	JLAs	We are aware that additional bus services will be provided to serve the West of Ifield development, and these will be included in our cumulative development test to connect to Gatwick for employee journeys to work.	Chapter 7 of the Transport Assessment and Section 5 of the Surface Access Commitments documents describe the coach routes assumed in the modelling work and the commitments GAL is making to delivering them, or others which result in an equivalent level of improved public transport accessibility.	Para 5.3.20 and Chapter 7 of the Transport Assessment [APP-258]. ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.21	West of Ifield	It is understood that the quantum of development at Land West of Ifield that is being assessed as part of the additional sensitivity testing is based on the EIA Scoping details (between 3,250 – 4,000 dwellings).	JLAs	Comments relating to planning will be addressed by other Topic Working Groups	Section 9.4 of Annex B of the Transport Assessment (Strategic Transport Modelling Report) and Section 12.11 of ES Chapter 12: Traffic and Transport set out the cumulative development tests that have been undertaken. Land West of Ifield has been tested with 3,250 dwellings, 15,000 sqm office space, 3,500 sqm food store, 6,000 sqm retail, 900 pupil secondary school and 1,450 pupil secondary school.	Section 9.4 of Annex B of the Transport Assessment [APP-258] Section 12.11 of ES Chapter 12: Traffic and Transport [APP-037]	
5.22	West of Ifield	As GAL will be aware, revisions to the National Planning Policy Framework (NPPF) made in July 2021, set out that “where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery” (para 22).	JLAs	Our modelling reflects Local Plan information provided by each LPA. The proposal for 3,250 dwellings is included in our cumulative development test based on information supplied by Homes England.	N/A	Para 5.3.10 to para 5.3.26 of the Transport Assessment [APP-258]	
5.23	West of Ifield	GAL will also be aware that Homes England has identified a wider strategic opportunity area to the west of Crawley for 10,000 new homes. Within this context, the Council considers that there is a requirement for GAL to consider the impact of 10,000 new homes in this	JLAs	The transport modelling follows DfT’s Transport Appraisal Guidance advice relating to the treatment of growth, including specific developments that are “near certain” or “more than likely” in core scenarios and “reasonably foreseeable” in sensitivity tests. These scenarios will be tested to a 2047 time horizon.	N/A	Para 5.3.10 to para 5.3.26 of the Transport Assessment [APP-258]	

		location and to specifically assess what the cumulative impacts of this significant development would be in conjunction with the Northern Runway Project.					
5.24	Car Parking Provision	MVDC acknowledges the clarification on the net increase of parking spaces, now proposed to be 4,200 spaces on site at the airport (please note MVDC's use of GAL's previous figures in our 'Planning A' comments dated 24 May 2022). It is still not clear whether this reduced figure has taken into account the additional parking need that will be associated with new facilities that will be built as part of the NR project, such as hotels and offices, or those developments that do not fall within the Nationally Significant Infrastructure Project (NSIP).	JLAs	The allocation of 4,200 spaces allows for the reduction in unauthorised off-airport parking, as stated in our presentation to the first Topic Working Group and set out in our Summer 2022 consultation material. No additional parking will be offered with new offices included within the Northern Runway Project. Proposals for new hotels assume a ground lease of a certain area and while prospective hotel providers may propose limited ground floor parking underneath a hotel building above this would be a commercial decision for them. Only limited additional spaces could be created in this way and restrictions on the height of the building (associated with aerodrome safeguarding) means ground floor parking would reduce the space available for hotel rooms or other facilities.	Chapter 2 and Table 2.4.1 of the Transport Assessment describe the car parking provision for the Project. The Project would result in a net increase of up to 1,100 car parking spaces.	Section 2.3 of the Transport Assessment [APP-258]. Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.25	Modal Shift	GAL is responsible for achieving a modal shift away from private cars. MVDCs current and future policies (draft Policy INF6) would further encourage the use of alternative sustainable travel modes. However, providing for GAL's forecasted growth appears to be what is driving the transport strategy and its surface access proposals. Given that the current demand is primarily car based, it appears as though private car use is also going to be the future profile. MVDC considers it essential that GAL demonstrate the justified growth needs that will be generated by the NR project and provide greater detail on GAL's intended Passenger Transport options before the ES is finalised. Only once these needs have been demonstrated a transport strategy can address modal shift.	JLAs	We are committed to increasing the share of journeys made by sustainable modes. However, private car use will continue to be an important consideration in our access proposals. We have set out that the growth in airport related car trips, even at a lower mode share, and the non-airport background traffic growth triggers the need for investment in roads around the airport. This is to ensure that they provide capacity for the future and avoid the network becoming congested. GAL proposes to fund these improvements in connection with the Northern Runway Project. Measures to attract passengers and staff to sustainable modes are being developed and tested using our transport models, to demonstrate the proposals have the desired impact.	The Surface Access Commitments document sets out the mode share commitments and the interventions identified across all modes.	Para 8.6.13 onwards of the Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.26	Car Parking Strategy	Further to the above point, given the drastically reduced quantum of parking spaces to cope with the Northern Runway passenger number growth, MVDC queries the need for GAL to provide the significant	JLAs	Our modelling methodology allows us to assess the impact of growth in airport related car trips, albeit at a lower mode share, alongside non-airport background growth. This is being used to determine the need for improvements to the road layout. Our proposed	N/A	Para 6.2.10 of the Transport Assessment [APP-258]. Section 12.8.3 onwards	

		level of changes to the road network surrounding the airport.		highway design provides the level of enhancement required for forecast road traffic up to 2047 allowing for a shift to sustainable modes. Additional passenger parking demand from the Northern Runway Project is only one of several contributors to road traffic. Passenger parking spaces are occupied for around 10 days on average and so one parking space typically generates an arrival and departure trip only once every 10 days. This compares with daily drop off/pick up airport trips, taxi journeys and background non-airport journeys which make up a larger proportion of daily trips and therefore have a greater impact on the required road capacity.		of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.27	Car Park Charges	MVDC awaits to see the finalised proposals for the public and sustainable transport upgrades in future TWGs, particularly improved local bus services. MVDC also keenly awaits the testing outcomes of the increased forecourt and car parking charges, designed to encourage the use of sustainable modes of transport to see whether this alters GAL's proposals ahead of the DCO submission.	JLAs	Noted. Further information will be provided in future Topic Working Groups.	The Surface Access Commitments document sets out the mode share commitments and the interventions identified across all modes.	Para 6.7.2 onwards of the Transport Assessment [APP-258]. Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037]. ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.28	Legislation and Policy	The scope of the legislation and policy is comprehensive and there is nothing further to consider in relation to this matter. Explain their policy fit/compliance with SCC LTP: increase in planes and cars vs. carbon emissions/Net Zero/health etc. Demonstrate the assumption that Heathrow R3 would have no impacts on passenger forecasts at Gatwick.	JLAs	Section 12.2 of Chapter 12: Traffic and Transport (PINS Doc Ref: App-037) to the Environmental Statement (ES) identifies the legislation and policy context for traffic and transport which has been taken into account in the environmental impact assessment. This includes, as listed in Table 12.2.2 of that same document, the Surrey Local Transport Plan, and specifically the aim to significantly reduce transport carbon emissions to meet the net zero challenge and to support delivery of Surrey's other priority objectives of enhancing Surrey's economy and communities, as well as the health and quality of life of Surrey's residents. In respect of this policy, as part of its Application, GAL has developed Surface Access Commitments (SACs) (PINS Doc Ref: APP-090) which identify the sustainable transport mode share outcomes which	N/A	Sections 12.2, 12.8, 12.11.79 to 12.11.81 and Table 12.2.2 of ES Chapter 12: Traffic and Transport [APP-037] Section 20.7.2 to 20.7.6 of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

				<p>GAL is committing to, together with commitments to the interventions and measures that GAL will use to achieve those mode shares. These interventions include measures that will increase public transport choice and encourage the use of public transport and active travel modes, alongside measures aim to reduce levels of private care use amongst air passengers and staff. Further information on the SACs is included in Section 12.8 of Chapter 12 and within the SACs document itself.</p> <p>Chapter 12 also provides commentary on the potential implication of a Heathrow third runway (Section 12.11.79 to 12.11.81), with a fuller analysis provided in Section 20.7.2 to 20.7.6 of Chapter 20: Cumulative Effects and Inter-relationships to the ES (PINS Doc Ref: App-045).</p>			
5.29	Legislation and policy – Soil surveys	Address the issues raised re. the DCO plans and schedules / identify which have not been actioned - see "DCO Plans and Schedules Comment Sheet SCC (Atkins)_v1" sent to Darren Atkins by Judith Jenkins 28/3/23	JLAs	The comments received from SCC have been considered as part of the development of the final DCO plans and schedules that are now available on the PINs website. We will discuss our responses to the comments raised and confirm if there are any further matters outstanding as part of SoCG discussions.	N/A	<p>DCO Schedules: Schedules 1, 3, 4, 5 and 6 of the Draft Development Consent Order [APP-002]</p> <p>Drawing sets illustrating surface access highways proposals: Works Plans [APP-017], Rights of Way and Access Plans [APP-018], Parameter Plans [APP-019], Surface Access Highways Plans [APP-020 to APP-022] and Traffic Regulation Plans [APP-023 to APP-025]</p> <p>Surface Access Landscape Proposals contained in ES Appendix 8.8.1: Outline Landscape and Ecology</p>	

						Management Plan - Part 1 [APP-113]	
5.30	Policy and Legislation	<p>The scope of the matters scoped into the assessment is agreed.</p> <p>Provide further detail of basis for determining the thresholds of assessment and significance. For instance, all active travel links should be in scope for assessment regardless of changes in traffic volumes.</p>	JLAs	<p>Section 12.4 of Chapter 12 to the ES explains the methodology applied to the assessment of traffic and transport effects, with Table 12.4.1 summarising the issues considered as part of the assessment.</p> <p>The IEMA guidance on assessing the environmental effects of road traffic recognises that small changes in traffic flow are unlikely to have any more than a negligible effect on receptors such as pedestrians and cyclists. Consequently, to allow the ES to focus on locations where significant effects may be more likely, the thresholds described in Section 12.4 of Chapter 12 to the ES (paragraph 12.4.10 in particular) have been adopted to screen out locations where traffic flow changes are expected to be small and to lead to negligible effects.</p>	N/A	Section 12.4 of ES Chapter 12: Traffic and Transport [APP-037]	
5.31	Policy and Legislation	<p>The extent of the area of detailed modelling and the study areas (including links) are agreed.</p> <p>Include roads to the north and west of the existing VISSIM model to capture important junctions.</p>	JLAs	Section 12.4.6 to 12.4.15 of Chapter 12 summarises the study area and modelling approach taken in respect of the highway network. The area covered by the microsimulation model remains as indicated in the Autumn 2021 consultation, as it is considered that the strategic model, which covers a much wider area but includes the local road network in the vicinity of the Airport, provides an appropriate means of assessing local network performance.	N/A	Section 12.4.6 to 12.4.15 of ES Chapter 12: Traffic and Transport [APP-037]	
5.32	Assessment Methodology – Baseline studies	Undertake model sensitivity tests to address areas of concern, such as: - Age of data (2016) and impacts of Covid (distribution and volume of demand)	JLAs	Section 12.4.25 to 12.4.31 of Chapter 12 to the ES	Para 12.5.13 of ES Chapter 12: Traffic and Transport explains that GAL will be reviewing the guidance from the DfT about the impact of the Covid pandemic and the potential need for updates to the transport modelling	Para 12.5.13 of ES Chapter 12: Traffic and Transport [APP-037]	
5.33	Assessment Methodology – Baseline studies	Address the issues raised re. the WCHAR report / identify which have not been actioned (see "Gatwick NRP WCH Assessment - Atkins Comment Sheet - Issue V1.1" sent by Rich Franklin to Darren Atkins on Mon 30/01/2023 @ 11:31)	JLAs	The comments received from SCC have been considered as part of the subsequent development of the WCHAR Assessment Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	Responses to comments raised and an updated copy of the report were issued on 05/10/23. We will seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part of SoCG discussions.	N/A	

5.34	Assessment Methodology – Baseline studies	Address the issues raised re. the WCHAR review report / identify which have not been actioned (see "Gatwick NRP GG 142 WCH Prelim Review Report - Atkins Comment Sheet - Iss V1.1" sent by Rich Franklin to Darren Atkins on Mon 06/02/2023 15:34)	JLAs	The comments received from SCC have been considered as part of the subsequent development of the WCHAR Review Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	Responses to comments raised and an updated copy of the report were issued on 05/10/23. We will seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part of SoCG discussions.	N/A	
5.35	Assessment Methodology – Baseline studies	Allow SCC to review the ES before confirming agreement with this statement, as we have not seen evidence that comments raised in Statutory Consultation Dec 21 feedback have been addressed	JLAs	Noted. To assist, Section 12.3 to Chapter 12 of the ES provides a summary of key comments received and a signposting to how they've been addressed in the Application. In particular, Tables 12.3.2 and 12.3.3 highlight such information in respect of the Autumn 2021 and Summer 2022 consultations.	N/A	Section 12.3 of ES Chapter 12: Traffic and Transport [APP-037]	
5.36	Assessment Methodology – Baseline studies	<p>Undertake model sensitivity tests to address areas of concern, such as:</p> <ul style="list-style-type: none"> - On busiest airport days and busiest network days - To determine what measures are required to meet/exceed targets of improving the public transport experience radically – to achieve 60% of our passengers, and 50% of our staff, using public transport to the airport (R2 ASAS) - Impact of full car park on the network (and what that means to mode share) 	JLAs	Section 12.5 of Chapter 12 to the ES identifies and explains the information and assumptions which have informed the assessment of traffic and transport effects. Technical details regarding such assumptions are further identified in Annex B - Strategic Transport Modelling Report (PINS Doc Ref: App - 260) to the Transport Assessment.	N/A	<p>Section 12.5 of ES Chapter 12: Traffic and Transport [APP-037]</p> <p>Annex B of the Transport Assessment [Strategic Transport Modelling Report] [APP-260]</p>	
5.37	Assessment Methodology – Baseline studies	<p>The models have been developed to standards that depart from WebTAG. Whilst that is pragmatic, it does not mean that SCC can be sure that the approach being adopted will meet important mode share targets and that the impacts are properly assessed and understood. As a result, SCC require GAL to:</p> <p>Include a maximum value from an 'uncertainty range' be added to all highway link flows to understand the possible impact (i.e. if 10% accuracy on</p>	JLAs	Please see response in relation to Reference T.03.01 above.	N/A	N/A	

		<p>link flow was used for validation rather than 5%, add 5% to the modelled flow).</p> <p>Consider the impacts of public transport model validation in terms of in-vehicle time and screen line performance and whether these forecasts are too optimistic in terms of public transport mode share.</p> <p>Confirm whether there is any interaction between the highway and public transport models and thus bus and coach travel might not have accurate journey times modelled.</p> <p>Confirm that the Variable Demand Model (VDM) excludes trip frequency and time of day choice as described in TAG UNIT M2.1 Variable Demand Modelling (para 4.5.1) and what the impact of this is on demand for travel.</p> <p>Undertake turning movement validation such that performance of the highway model at locations pertinent to the development of the microsimulation model.</p> <p>Give reassurances that public transport forecasts are correct as the model seems to over-estimate the public transport and Greater London and the South East and does so significantly for the county of Surrey - which could under-estimate highway impacts.</p> <p>Undertake a sensitivity test to demonstrate that the realism test results for car fuel costs, which is at the high end or indeed higher than TAG criteria, would not result in a greater shift away from car than might be otherwise be expected to happen.</p>					
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5.38	Assessment Methodology – Baseline studies	Provide further details of traffic volumes on the SRN as we have concern that in reality traffic would use the LRN.	JLAs	Section 11 of Annex B to the Transport Assessment provides the assessment of the future baseline, including in relation to the highway network.	N/A	Section 11 of Annex B of the Transport Assessment [Strategic Transport Modelling Report] [APP-260]
5.39	Assessment Methodology – Baseline studies	Explain why, if the PEIR states (12.6.57) that BAU and NRP would have common targets, covered by the ASAS of a 60% sustainable travel mode share for passengers by 2030, that this is not met in neither scenario. Without such explanation, the future baseline cannot be considered as the right place to ascertain the impacts of the NRP.	JLAs	<p>Section 12.6.68 to 12.6.76 to Chapter 12 to the ES explains the role of the existing Airport Surface Access Strategy in the future baseline modelling for the traffic and transport assessment. Specific to the Northern Runway Project, the Surface Access Commitments identify the mode share targets which build upon the existing ASAS measures and explains the interaction between the SACs and the ASAS (see section 2 of the SACs).</p> <p>Section 12.8 to Chapter 12 to the ES provides further clarification on the role of the SACs in the assessment of the traffic and transport effects. The modelling demonstrates that the identified measures and interventions lead to an increase in annual average air passenger public transport mode share from around 45% prior to the Covid-19 pandemic up to 52% in the future baseline years, and 54% to 56% in the "with Project" scenario.</p>	N/A	<p>Paragraphs 12.6.68 to 12.6.76 and section 12.8 of ES Chapter 12: Traffic and Transport [APP-037]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>
5.40	Assessment Methodology – Baseline studies	Confirm parking numbers (there is a discrepancy in the ES project description); clarify reasoning/justification for reduction in spaces per staff/passengers; clarify why highway mitigation has not been reduced in line with reduction in number of additional spaces proposed (18,500 to minimal); clarify position re. offsite car parking; provide parking strategy	JLAs	<p>Section 5.2.83 to 5.2.90 of Chapter 5: Project Description (PINS Doc Ref: App-030) to the ES explains the car parking proposals included as part of the Application and the rationale which has informed the same.</p> <p>Specific to off-site car parking, Commitment 8 to the SAC confirms GAL's commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority, and/or to support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.</p>	N/A	<p>Section 5.2.83 to 5.2.90 of ES Chapter 5: Project Description [APP-030]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>
5.41	Assessment Methodology – Baseline studies	Confirm whether they have permission for the additional 6,570 spaces that are assumed in the base?	JLAs	Section 4.4.6 and 4.4.7 of Chapter 4: Existing Site and Operation (PINS Doc Ref: APP-029) to the ES provides the planning status and anticipated timeline	N/A	Section 4.4.6 and 4.4.7 of ES Chapter 4: Existing Site and Operation [APP-029]

				for the new car parks proposed in the absence of the Project.			
5.42	Assessment Methodology – Baseline studies	State mechanism for ensuring that parking is not overprovided - DCO requirement? The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106?	JLAs	As noted in earlier response, the car parking proposals and their justification are included in Sections 5.2.83 to 5.2.90 of the Project Description. In addition, and in recognition of the Surface Access Commitments, GAL has committed to using parking charges to influence passenger travel choices to achieve the necessary mode share outcomes specified in the SACs.	N/A	Sections 5.2.83 to 5.2.90 of ES Chapter 5: Project Description [APP-030]	
5.43	Assessment Methodology – Baseline studies	The charging mechanism for parking/airport access that is fed into the model needs to be tied into a permission if the outcome mode share is demonstrated to be dependent upon at least that level of charge	JLAs	Sections 12.8.5 to 12.8.9 of Chapter 12 to the ES identifies and explains the surface access interventions, including parking pricing, included within the strategic transport model. As noted in Section 12.8.6, whilst a level of charge has been identified for the purposes of the model, the SACs do not commit to a specific price as GAL needs to be able to retain flexibility to adjust charges as necessary to respond to progress in achieving the committed mode share outcomes.	N/A	Sections 12.8.5 to 12.8.9 of ES Chapter 12: Traffic and Transport [APP-037]	
5.44	Assessment Methodology – Baseline studies	Address the issues raised re. the Highways Design Strategy report / identify which have not been actioned (see "GAL NRP DCO Review of Highways Design Strategy Report_v1" sent by Sue Janota to Darren Atkins on Thu 16/02/2023 @ 15:46)	JLAs	The comments received from SCC have been considered as part of the subsequent development of the Highways Design Strategy Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	Responses to comments raised and an updated copy of the report were issued on 05/10/23. We will seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part of SoCG discussions.	N/A	
5.45	Assessment Methodology – Baseline studies	Address the issues raised re. the Longbridge Roundabout Departures from Standard / identify which have not been actioned (see "Gatwick NRP DCO_SCC Departures Review_v2" sent by Mike Green to Darren Atkins on Fri 10/03/2023 16:33)	JLAs	The comments received from SCC have been considered as part of the subsequent development of the Longbridge Roundabout Departures from Standard submission documents. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	Responses to comments raised and an updated copy of the report were issued on 05/10/23. We will seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part of SoCG discussions.	N/A	
5.46	Assessment Methodology – Baseline studies	Address the issues raised re. the Drainage Strategy Report which have not been actioned sent by Mike Burch to Darren Atkins 30/9/22	JLAs	Updated Drainage Strategy Report issued on 27/03/23 with responses to comments raised by SCC. A further review will be undertaken as part of SoCG discussions to confirm if there are any issues that remain outstanding.	N/A	N/A	
5.47	Assessment Methodology – Baseline studies	Address the issues raised re. the Maintenance and Operations Report and Statutory undertakers diversion report	JLAs	Updated copies of the Maintenance and Operations Report and Statutory Undertakers Diversions Report were issued on 14/07/23 with responses to comments raised by SCC. A further review will be undertaken as	N/A	N/A	

		which have not been actioned sent by Judith Jenkins to Darren Atkins 13/1/23		part of SoCG discussions to confirm if there are any issues that remain outstanding.			
5.48	Assessment Methodology – Baseline studies	Address the issues raised re. the Structures Option Report which have not been actioned sent by Alan Mclean to Darren Atkins 17/1/23	JLAs	Updated Structures Options Reports were issued on 27/03/23 with responses to comments raised by SCC. A further review will be undertaken as part of SoCG discussions to confirm if there are any issues that remain outstanding.	N/A	N/A	
5.49	Assessment Methodology – Baseline studies	Address the issues raised re. the RSA / identify which have not been actioned (see "Gatwick NRP_RSA Response Report Review_v1_Issue" sent by Mike Green to Darren Atkins on 18/04/23	JLAs	Following subsequent discussions with SCC, these items are expected to be discussed further as part of SoCG discussions following progression of discussions regarding the departures from standard.	N/A	N/A	
5.50	Assessment Methodology – Baseline studies	Confirm how the proposals fit in with the proposed Horley business park	JLAs	As explained in response to the equivalent point in Table 12.3.2 of Chapter 12 to the ES, as there are no firm proposals for Horley Business Park it is not included in the core scenario considered in the transport model given its level of uncertainty. This approach is in keeping with TAG Unit M4. Instead, it considered as part of the cumulative effects assessment discussed in Section 12.11 of Chapter 12. The South Terminal roundabout improvements proposed as part of the Project do not preclude the opportunity for access to be provided for the Business Park should it ultimately become necessary for that development.	N/A	Table 12.3.2 and Section 12.11 of ES Chapter 12: Traffic and Transport [APP-037]	
5.51	Assessment Methodology – Baseline studies	Provide further detail behind assumptions that bus and coach operators will increase services to meet demand. Demonstrate the impacts of situations in which dynamic car park pricing meaning that the car parks will be 'operationally' full. Provided bus priority where it would assist bus/coach accessibility and does not hinder active travel accessibility on every new/altered junction. Increase the frequency on existing routes or create new routes as a result of the NRP that serve the SCC area for both bus and rail modes.	JLAs	Chapter 11 of the Transport Assessment explains the existing bus and coach provision at the Airport and the assumptions made in respect of their services under both the future baseline and with Project scenarios. In particular, Section 11.3.17 (by reference to the Surface Access Commitments) identifies the improvements in bus and coach provision as part of the Project and the financial support which GAL is committing to ensure the same. Sections 11.3.20 to 11.3.25 compares the future baseline and with project scenarios in respect of bus and coach journeys and highlights that bus and coach operators are able to adjust capacity to manage demand more readily than other modes, e.g. rail.	N/A	Chapter 11 of the Transport Assessment [APP-258]	

		Undertake road improvements in a phased way before the northern runway comes into routine use.					
5.52	Assessment Methodology – Baseline studies	Contribution to Brighton Mainline Upgrade Programme (BMUP) and CARS based on % impact as GAL NRP will increase demand on services while improvements will also benefit GAL to achieve ambitious modeshare targets	JLAs	Section 9.4.19 to 9.4.25 provides commentary in respect of the BMUP and CARS and confirms that as such improvements are not sufficiently advantage to be considered as committed at this stage (applying the TAG Unit M4 classification), such improvements have not been included in the strategic transport model, but GAL will continue to work closely with Network Rail to support such improvements.	N/A	Section 9.4.19 to 9.4.25 of the Transport Assessment [APP-258]	
5.53	Assessment Methodology – Baseline studies	Make bus improvements relevant to SCC? (More/increased services, bus priority at junctions + BSIP? - Redhill-Horley-Gatwick metrobus 100 corridor has scope to become a Superbus network)	JLAs	Please see response in the first row to this specific question reference above.	N/A	N/A	
5.54	Assessment Methodology – Baseline studies	Confirm how the North Downs Line services would change as part of the scheme	JLAs	As noted in Section 9.6.4 and 9.6.5 of the Transport Assessment, the impact of the Project on North Downs Line services is expected to be very small. Seated Load Factors would be slightly higher with the Project than in the future baseline. There would be sufficient seated capacity in all years on the North Downs Line in the with Project scenario, except in 2047 (07:00-08:00) where the Seated Load Factor would increase to just above 1.0 between Reigate and Redhill. This would also occur in the future baseline and would not be worsened by the Project. It indicates low density standing on the short journey leg between Redhill and Reigate, and there would still be spare standing capacity at this time.	N/A	Section 9.6.4 and 9.6.5 of the Transport Assessment [APP-258].	
5.55	Assessment Methodology – Baseline studies	Confirm that the highway improvements will be made before Northern Runway comes into use	JLAs	Table 12.8.1 of Chapter 12 to the ES explains the mitigation proposed as part of the Project and how such measures have been secured. Specific to the highway improvement works, the modelling shows that they will be required for the Project by the assessment year 2032 (i.e. 3 years after the modelled runway opening year). Accordingly, the commitment to have completed those works by the 3rd anniversary of the commencement of dual runway operations (unless otherwise agreed with National Highways as the relevant authority) is secured pursuant to Requirement 6(2) of Schedule 2 to the draft DCO (PINS Doc Ref: App-006).	N/A	Table 12.8.1 of ES Chapter 12: Traffic and Transport [APP-037].	

5.56	Assessment Methodology – Baseline studies	Confirm monitoring/what happens if modeshare targets not met	JLAs	Section 6 of the Surface Access Commitments sets out GAL's proposed approach to monitoring and reporting on the commitments set out in that document, through the production of an Annual Monitoring Report (AMR), together with the steps which it will take in circumstances where the AMR shows that the mode share commitments have not been met or, in GAL's opinion (acting reasonably), that they may not be. This approach builds on the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group, which has seen GAL continue to invest in achieving sustainable transport mode shares.	N/A	Section 6 of the ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
5.57	Assessment Methodology – Baseline studies	(GAL have shown some detailed construction information - SCC has raised specific initial queries. Key areas = Longbridge Roundabout area and Balcombe Road + Construction routing shows traffic making U-turn at Longbridge roundabout - will need to understand impact)	JLAs	Section 5.3 of the Project Description describes the proposed construction approach for the Project which has informed the assessment.	N/A	Section 5.3 of ES Chapter 5: Project Description [APP-030]	
5.58	Assessment Methodology – Baseline studies	Confirm if any construction is taking place beyond 2029? (based on title of matter)	JLAs	Following from the response above, the indicative construction sequencing is included at Table 5.3.1 and section 5.3.55 onwards of the Project Description describes the anticipated construction activities which will continue beyond assessment year 2029, including in respect of the surface access highway improvements (sections 5.3.71 to 5.3.74).	N/A	Table 5.3.1 and Section 5.3.55 onwards of ES Chapter 5: Project Description [APP-030]	
5.59	Assessment Methodology – Baseline studies	Improve mitigation for footpath diversions (some lengthy and unsuitable)	JLAs	Appendix 19.8.1: Public Rights of Way Management Strategy to Chapter 19 of the ES (PINS Doc Ref: App - 215) describes GAL's approach to managing impacts on Public Rights of Way (PROW) because of the construction and operation of the Project to reduce disruption to users of such PROWs as far as possible. Requirement 22 of Schedule 2 to the draft DCO secures that detailed PROW implementation plans for individual PROWs would be developed prior to the commencement of construction (to be in general alignment with the PROW Management Strategy) and subject to prior approval by the relevant planning authority.	N/A	ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215] Requirement 22 of Schedule 2 to the draft DCO [APP-006]	

5.60	Assessment Methodology – Baseline studies	<p>Undertake additional microsimulation and junction modelling in proximity to the airport (and wider than considered at present).</p> <p>Demonstrate that volumes of traffic forecast on SRN are variable and that that SRN would have capacity for this extra traffic, such that resilience to problems and the impact on the LRN is as reported.</p>	JLAs	<p>Microsimulation modelling has been carried out for 2032 and 2047 with and without the Project, covering the network in the vicinity of the Airport, as set out in Section 13 of the Transport Assessment. The area covered by the microsimulation model remains as indicated in the Autumn 2021 consultation, as it is considered that the strategic model, which covers a much wider area but includes the local road network in the vicinity of the Airport, provides an appropriate means of assessing local network performance. The effects of the Project in relation to driver delay have been considered, as explained in Section 12.9 of Chapter 12 to the ES and Section 12 of the Transport Assessment. The strategic modelling work, described in Section 12 of the Transport Assessment, considers 2029, 2032 and 2047 with and without the Project and demonstrates the effects on the performance of the wider SRN and the local road network within the modelled area.</p>	Please see Annex C of the Transport Assessment which is on the VISSIM microsimulation modelling undertaken for the highway network around the airport.	<p>Sections 12 and 13 of the Transport Assessment [APP-258].</p> <p>Annex C of the Transport Assessment [APP-258].</p> <p>Section 12.9 of ES Chapter 12: Traffic and Transport [APP-037]</p>	
5.61	Assessment Methodology – Baseline studies	<p>The assessment of effects for the Interim Assessment Year of 2032 is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.</p>	JLAs	Noted	N/A	N/A	
5.62	Assessment Methodology – Baseline studies	<p>The assessment of effects for the Design Year of 2047 is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information</p>	JLAs	Noted	N/A	N/A	
5.63	Assessment Methodology – Baseline studies	<p>The consideration of potential changes to the assessment as a result of climate change is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.</p>	JLAs	Noted	N/A	N/A	

5.64	Assessment Methodology – Baseline studies	<p>The zone of influence and list of other developments and plans considered within the cumulative effects assessment is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.</p>	JLAs	Noted	N/A	N/A	
5.65	Assessment Methodology – Baseline studies	<p>The cumulative effects assessment for the year of 2029 is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.</p>	JLAs	Noted	N/A	N/A	
5.66	Assessment Methodology – Baseline studies	<p>The cumulative effects assessment for the year of 2032 is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information</p>	JLAs	Noted	N/A	N/A	
5.67	Assessment Methodology – Baseline studies	<p>The cumulative effects assessment for the year of 2047 is agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information</p>	JLAs	Noted	N/A	N/A	
5.68	Assessment Methodology – Baseline studies	<p>The identified topics for inter-related effects are agreed.</p> <p>At this stage - we have focused on overall effects and will consider the particular</p>	JLAs	Noted	N/A	N/A	

		years in more detail once we have the necessary information.					
5.69	Assessment Methodology – Baseline studies	The identified topics for inter-related effects are agreed. At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.	JLAs	Noted	N/A	N/A	
5.70	Assessment Methodology – Baseline studies	The mode share commitments within the Surface Access Commitments are agreed. Query whether targets ambitious enough + need to be compared with BAU	JLAs	As noted in earlier responses, Section 12.8 to Chapter 12 to the ES explains the approach proposed in respect of the Surface Access Commitments, including the mode share targets in respect of air passenger and staff journeys. Sections 12.8.12 and 12.8.13 provide the comparison with the future baseline mode shares and show the improvements provided as a result of the Project. Section 7 to the Surface Access Commitments identifies the further aspirational mode share-targets which go beyond the committed outcomes under the SACs, and which GAL will strive to achieve in line with its wider aspirations for sustainable transport to and from the airport.	N/A	Section 12.8 of ES Chapter 12: Traffic and Transport [APP-037] Section 7 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.71	Assessment Methodology – Baseline studies	The suite of further actions under the Surface Access Commitments are agreed. Provide confidence that the traffic models are sufficiently robust to be giving accurate forecasts of the impacts of the commitments. Given that the commitments are not met regarding public transport mode share, provide further measures to meet the commitments.	JLAs	Please see responses to earlier questions in respect of the approach taken to the development and methodological approach followed in respect of the strategic transport model and its outputs, including in relation to the surface access commitments.	N/A	N/A	
5.72	Assessment Methodology – Baseline studies	The securing mechanism for the Surface Access Commitments (via the Section 106 Agreement) is agreed.	JLAs	Noted. The requirement to comply with the Surface Access Commitments is secured through Requirement 20 of Schedule 2 to the draft DCO.	N/A	ES Appendix 5.4.1: Surface Access Commitments [APP-090] Requirement 20 of	

		SCC need to further review the mechanisms in light of the order and completion of T.10.02				Schedule 2 to the draft DCO [APP-006]	
5.73	Assessment Methodology – Baseline studies	The Outline Construction Workforce Travel Plan (APP-TBC) is agreed. SCC need to review the document	JLAs	Noted. The Outline Construction Workforce Travel Plan is submitted as Annex 2 to Appendix 5.3.2: Code of Construction Practice (CoCP) (PINS Doc Ref: App-084) and secured by Requirement 13 of Schedule 2 to the draft DCO.	N/A	Annex 2 to ES Appendix 5.3.2: Code of Construction Practice [APP-084] Requirement 13 of Schedule 2 to the draft DCO [APP-006]	
5.74	Assessment Methodology – Baseline studies	The provision of a Travel Plan (incl. ongoing monitoring) for construction and operation in accordance with the Outline Construction Workforce Travel Plan (APP-TBC) is agreed. The securing mechanism (via the Section 106 Agreement) is agreed. SCC need to review the document	JLAs	As above	N/A	N/A	
5.75	Assessment Methodology – Baseline studies	The Construction Traffic Management Plan (APP-TBC) is agreed. The securing mechanism (via the Section 106 Agreement) is agreed. Assess the impact of construction traffic at the Longbridge Roundabout (routing shows traffic making U-turn at Longbridge roundabout)	JLAs	Noted. The Outline Construction Traffic Management Plan is submitted as Annex 3 to the CoCP (PINS Doc Ref: App-085) and secured by Requirement 12 of Schedule 2 to the draft DCO.	N/A	Annex 3 to ES Appendix 5.3.2: Code of Construction Practice [APP-085] Requirement 12 of Schedule 2 to the draft DCO [APP-006]	
5.76	Assessment Methodology – Baseline studies	The Construction Traffic Management Plan (APP-TBC) is agreed. The securing mechanism (via the Section 106 Agreement) is agreed. Assess the impact of construction traffic at the Longbridge Roundabout (routing shows traffic making U-turn at Longbridge roundabout)	JLAs	Section 15 of the Transport Assessment provides an assessment of the Project's construction activities on the transport network. Section 15.5.12 to 15.5.15 identifies the proposed works in respect of the Longbridge roundabout with Section 15.6 providing the assessment conclusions.	N/A	Chapter 15 of the Transport Assessment [APP-258]	
5.77	Assessment Methodology – Baseline studies	The Construction Traffic Management Plan (APP-TBC) is agreed. The securing	JLAs	See response above.	N/A	Chapter 15 of the Transport Assessment [APP-258].	

		<p>mechanism (via the Section 106 Agreement) is agreed.</p> <p>Confirm time of year of construction/assess impact (concern about time of year / construction coinciding with Summer)</p>					
5.78	Transport and Highways	Response to Surrey County Council's extensive 'Issues Tracker'	JLAs	Please refer to separate SCC Transport Issues Tracker.	N/A	N/A	
5.79	Transport and Highways	A Designer's Response to the Stage 1 Road Safety Audit for the proposed highway mitigation between the Longbridge roundabout and M23 spur. To detail exactly how the road safety issues are to be addressed and the design amended accordingly;	JLAs	A Stage 1 Road Safety Audit has been undertaken for the highway improvement works proposed as part of the Project. The draft Stage 1 Road Safety Audit Response Report was shared on 27th March 2023 with SCC, WSCC and National Highways. The agreed actions arising from the Road Safety Audit are being discussed with the relevant highway authorities.	N/A	N/A	
5.80	Transport and Highways	The rationale for the reclassifying of the M23 spur to an 'A' class road	JLAs	The decision to reclassify the M23 Spur to an 'A' road was made following engagement with National Highways after the Autumn 2021 Consultation. The change in classification is expected to contribute to a change in character of the proposed road (e.g. as a result of changes to signage), forming part of a broader package of measures that aim to encourage drivers to adopt appropriate speeds on this section of the scheme with safety benefits for users. Further details are also contained in the technical highway design reports supporting the SoCG process with the Highway Authorities.	N/A	N/A	
5.81	Transport and Highways	A rationale/justification for the desire to reduce the speed limit on London Road A23 to 40mph. An assessment is also required to see whether it accords with WSCC adopted Speed Limit Policy;	JLAs	<p>The urban/partially built-up characteristics of this section of the A23 London Road combined with the proposals to provide new and upgraded facilities for pedestrians and cyclists alongside and crossing the A23 London Road at the proposed new signal controlled junction with North Terminal Link are considered to most closely align with West Sussex Speed Limit Policy's Functional Hierarchy category for 40mph speed limit roads. It is expected that the proposed speed limit reduction would encourage reduced speeds on the road with safety benefits for all road users including active travel users.</p> <p>West Sussex Speed Limit Policy highlights that "lower traffic speeds may also encourage more walking and</p>	N/A	N/A	

				<p>cycling". This aligns with the scheme's objective of increasing sustainable mode share through measures which include the scheme's proposed active travel infrastructure improvements.</p> <p>This topic is being discussed further with WSCC. Further details are contained in technical highway design reports supporting SoCG process with highways authorities.</p>			
5.82	Transport and Highways	A commitment to provide a draft copy of the Transport Assessment in advance of submission of the DCO;	JLAs	<p>The Transport Assessment forms part of the DCO Application and is available to view on PINS website. The main report is contained in APP-258 and its accompanying annexes (Annexes A to E) are contained in APP-259 to APP-263.</p> <p>The draft Transport Assessment was shared with National Highways on 31st May 2023.</p>	N/A		Transport Assessment [APP-258] and Annexes A to E [APP-259 to APP-263]
5.83	Transport and Highways	Draft highway boundary plans do not accord with WSCC records for London Road. Agreement needs to be reached as to the revised extent of highway boundaries maintainable by each Highway Authority;	JLAs	GAL are facilitating with LPAs an understanding of the discrepancy.	N/A		N/A
5.84	Transport and Highways	The draft PRoW strategy and design detail on active travel routes, including widths, cross sections, crossing details, appearance, and how they meet LTN1/20.	JLAs	<p>The Project proposes improvements to active travel routes, and which are explained in paragraph 5.2.116 to 5.2.119 of ES Chapter 5: Project Description. The proposals are also shown on Figure 5.2.1d and further details are provided on the Surface Access Highway Plans - General Arrangement Plans.</p> <p>The DCO Application contains the Public Rights of Way Management Strategy under ES Appendix 19.8.1 and which sets out the approach to managing impacts on public rights of way during construction and operation of the Project.</p>	N/A		ES Chapter 5: Project Description [APP-030] ES Figure 5.2.1d [APP-053] Surface Access Highway Plans - General Arrangement Plans [APP-020] ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]
5.85	Walking and cycling infrastructure	The requirements of national policy with regard to assessing and improving walking and cycling infrastructure should be fully addressed.	CBC	N/A		Section 8.4 of the Planning Statement covers Surface Access and Impacts on Transport Networks including sustainable transport and active travel considerations. Section 8.4 of the	Section 8.4 of the Planning Statement [APP-245]

					statement sets out the relevant policy context, assessment undertaken and a summary of planning policy compliance.	ES Chapter 19 Agricultural Land Use and Recreation [APP-044]	
5.86	Crawley Western Link Road	Support should be provided for the Crawley Western Link Road.	CBC	N/A	The Crawley Western Link Road scheme is not confirmed within the list of future infrastructure changes as it is not a committed scheme. It is not required by the NRP scheme to support future airport growth.	N/A	
5.87	ASAS	CBC welcome that GAL are progressing an ASAS for the Northern Runway Project to promote sustainable travel. However, it is disappointing that a such a comprehensive transport strategy is not available alongside either the PEIR last autumn or this current consultation. The mode share targets and assumptions in the ASAS need to be understood in order to justify the parking provision and traffic modelling / highway works etc. The ASAS needs to clearly identify the measures which will be implemented to achieve its targets and show how they will interrelate, including the Public Transport Strategy, the Parking Strategy, and the Active Travel Strategy. Without these, the council cannot judge whether the measures being proposed are sufficient or, in the case of the highway works and parking proposals, perhaps overproviding. This is a significant missing piece of the project without which other aspects cannot be fully understood or commented upon at this stage.	CBC	N/A	<p>We have prepared a Surface Access Commitments (SAC) document as part of the DCO submission. This document sets out clearly the committed mode shares and the interventions which will be implemented to achieve the mode shares. The SAC will be secured as a legally binding commitment under the DCO.</p> <p>As confirmed in paragraph 2.1.9 of the SAC document, GAL will produce a new ASAS in line with the existing policy requirements. Subject to the DCO consent being granted, any future ASAS will be developed in full cognisance of the commitments GAL is making about surface access outcomes and measures as part of the Project, as secured by the SAC document, and become the means through which those commitments are delivered.</p>	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.88	ASAS	CBC feels that the ASAS should set more ambitious targets with clear metrics separated by mode (public transport (rail, bus, coach), walking, cycling). Targets should be set for each mode separately so that progress can be monitored and the effectiveness of any interventions or initiatives for each mode can be measured and assessed.	CBC	N/A	The Surface Access Commitments document provides mode share commitments for air passengers in terms of public transport; airport staff journeys in terms of public transport, shared travel and active modes; drop-off and pick-up car journeys; and active modes for staff within 8km of the airport. These are considered to be appropriate overarching	Section 4.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

					mode shares and allows for interventions to be flexible in targeting different modes.		
5.89	ASAS	CBC also questions the definition of sustainable transport modes, which appears to include low/zero emission vehicles. The aim of the ASAS should be to move more journeys from single occupancy car use, so zero/low emission vehicles should not be included in a sustainable transport target, as this does nothing to reduce congestion and pressure on car parking, and still has some impacts on air quality.	CBC	N/A	Definitions are provided in paragraph 4.2.2. of the Surface Access Commitments document. Low / zero emission vehicles are not included in the definitions associated with the mode share commitments.	Paragraph 4.2.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.90	Bus access	What work has been undertaken to investigate routes to serve new development, for example, West of Crawley, including the Western Link Road /multi-modal corridor? CBC would welcome being consulted on proposals for improved bus and coach access to the airport, particularly improved local bus services.	CBC	N/A	The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.91	Car parking	GAL should be seeking to provide parking based on the passenger growth numbers associated with the DCO and within the context of its sustainable mode share surface access obligations. There is a need for a detailed parking strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project in the context of ambitious modal share targets for surface access. Currently, the parking proposals lack any robust justification for the number of spaces. The Parking Strategy, in the context of the sustainable transport strategy, should demonstrate the number of spaces required to support growth associated with the DCO, and show that Gatwick, together with existing authorised off-airport parking can meet these parking needs. This would support the Local Plan	CBC	N/A	The revised proposals for the number of parking spaces required takes account of estimates of mode share, and is based on detailed transport modelling. This means that the increase in use of sustainable modes significantly limits the additional spaces required for growth beyond those that are needed to replace spaces lost during construction. GAL's current s106 obligations require all capacity for airport growth to be accommodated on-site and the proposals assume no increase in off-airport authorised capacity. In order to minimise the amount of additional parking, whilst allowing enough capacity for growth GAL has assumed an improvement in the efficiency of use, higher space occupancy and more flexibility in making spaces available for pre-booking and split between self-park and valet-park. Details of how the modal share aspirations will be	Chapter 2 of the Transport Assessment [APP-258] Section 5.2 [para 5.23.83 onwards) of the ES Chapter 5: Project Description [APP-030] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

		Policy approach. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal share aspirations will be achieved. Ensuring 'sufficient but no more than necessary' Parking Provision.			achieved are contained in the Surface Access Commitments document.	
5.92	Car parking	The council is of the view that a mechanism is required to ensure that the amount of parking provision on-airport is provided only when it is needed, and this must be monitored, therefore enabling it to be managed in line with the requirements of the S106 legal agreement. Whilst it is appreciated that an element of flexibility is required by both GAL and the Local Authorities to ensure 'sufficient but no more' parking provision, GAL's wide-ranging permitted development rights provide significant scope for new parking coming forward on airport without the need for planning permission. The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106 was suggested at the Planning A TWG, and we welcome GAL's willingness to discuss options, with possible mechanisms including a 'requirement' on the DCO or an obligation within the S106 legal agreement. We note that in this event, GAL would retain the option to apply for planning permission, thus enabling new parking proposal to be assessed in light of a demonstrable need and within the context of the sustainable surface access strategy.	CBC	N/A	<p>The proposals for additional parking are largely to replace capacity lost during construction, the timing and location of these replacement spaces are therefore linked to ensuring there is sufficient parking available through the construction phase, when there will be a significant loss of existing sites. There is a very small net overall increase in parking provision and the additional spaces will only be made available once there is evidence of need through monitoring of growth.</p> <p>Discussions with respect of relevant S106 agreements has not yet taken place.</p>	Section 5.2 (para 5.23.83 onwards) of the ES Chapter 5: Project Description [APP-030]
5.93	Car parking	There is also need for a mechanism to ensure that the 'sufficient but no more' parking approach can be maintained over the construction period of the project (para 3.2.6) as areas of parking are lost (either temporarily or permanently) and replacement parking is provided	CBC	N/A	<p>The proposals for additional parking are largely to replace capacity lost during construction, the timing and location of these replacement spaces are therefore linked to ensuring there is sufficient parking available through the construction phase, when there will be a significant loss of existing sites. The number of on-airport parking spaces will continue to be monitored annually and further</p>	<p>Section 5.2 (para 5.23.83 onwards) of the ES Chapter 5: Project Description [APP-030]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>

					monitoring will be undertaken in accordance with the Surface Access Commitments document.		
5.94	Car parking	CBC keenly awaits the testing outcomes of the increased forecourt and car parking charges, designed to encourage the use of sustainable modes of transport to see whether this alters GAL's proposals ahead of the DCO submission	CBC	N/A	Increased forecourt and car parking changes are included in the strategic transport modelling which indicates the expected mode shares with the Project. These are set out in Section 6.10 (future baseline) and Chapter 7 (with Project) of the Transport Assessment.	Section 6.10 and Chapter 7 of the Transport Assessment [APP-258] Annex B: Strategic Transport Modelling Report of Transport Assessment [APP-260]	
5.95	Bus and coach infrastructure	Has an assessment of current bus and coach infrastructure been made? This should be undertaken to determine the physical improvements (physical works) needed to make bus and coach travel more attractive and enable a greater modal shift.	CBC	N/A	The opportunities for implementing additional physical works associated with bus infrastructure was considered during highway design development. This notes the constraints that exist within the main transport corridors and the need to balance infrastructure proposals with environmental, land and community impacts. The package of proposals highlighted in the Surface Access Commitments identify several specific measures to encourage journeys by bus, coach and other sustainable modes and this is reflected in the proposed mode shares.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.96	Bus and coach infrastructure	Improved bus and coach provision is needed for early morning and late-night flights, especially if considering increasing forecourt charges when there are no other options for accessing the airport at these times. What work has been undertaken to investigate routes to serve new development, for example, West of Crawley, including the Western Link Road /multi-modal corridor? CBC would welcome being consulted on proposals for improved bus and coach access to the airport, particularly improved local bus services.	CBC	N/A	The need for early morning and evening services is already recognised by GAL and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as strengthening weekend services. GAL has worked with Metrobus to develop an extensive, 24-hour, local bus network. GAL is currently funding some of these local bus services through its Sustainable Transport Fund. Typically, GAL will provide Metrobus with catchment information and Metrobus will provide a proposed route and a funding plan for the period before the route is expected to become commercially viable. Improved provision of bus and coach services have been discussed within the Topic Working Groups leading up to DCO submission and are set out in the Transport Assessment and Surface Access Commitments document. It is	Paragraphs 11.2.9 and 11.2.10 of the Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

					noted that GAL already support 24hr bus services operated by Metrobus providing access to the airport. Bus services associated with the West of Ifield development are a matter for the promoter of that site and GAL has taken account of their proposed services in its cumulative development scenario.	
5.97	Active travel infrastructure	Inadequate consideration of potential for improvements to existing provision or opportunity for new active travel infrastructure to enable greater take up of walking and cycling. If improvements to pedestrian and cycle networks are limited to within the airport, then increases in active travel mode share will simply not happen. Proposals focus on upgrading infrastructure based on existing usage patterns and volumes, rather than seeking to enhance connectivity for pedestrians and particularly people on bikes into Crawley, and beyond. Many Gatwick staff live in Crawley, where much of the residential area is within 5km of the airport, providing a significant opportunity to increase the active travel to work for staff from the current 3%, if the connectivity is improved through new links and improvements to existing routes, as long as they are of high quality.	CBC	N/A	<p>There was considerable engagement on active travel proposals through the Topic Working Groups and proposals are included within the design of highway measures and segregated pedestrian and cycle infrastructure within the DCO. These proposals are not limited to areas within GAL land. Proposals take account of staff distribution, existing and future travel behaviour, nature of employment (high proportion of shift work involving travelling at night) and proposals made by local authorities in their Local Cycling and Walking Infrastructure Plans (LCWIPs).</p> <p>The physical improvements as part of the Project form part of GAL's commitment to supporting more active travel by employees living close to the airport, which includes a specific mode share target as set out in the Surface Access Commitments document. A wider package of measures will be delivered to help achieve Commitment 4 including additional signage, promotion, staff incentives and information. GAL will also enhance on-site facilities to ensure sufficient cycle storage, changing facilities, lockers and showers are available and these support the aim of encouraging more staff to walk and cycle.</p> <p>The scope and nature of the proposed physical improvements have also been developed with due consideration of schemes identified in local plans (including the Reigate and Banstead LCWIP (May 2022) and Crawley LCWIP (2021) and seek to complement these proposals as well as take account of key safety considerations at each location. The measures included in the final</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>Figure 12.6.2 in the ES Traffic and Transport Figures [APP-059]</p>

					<p>design proposals, as illustrated in illustrated in the plan drawing that forms Figure 12.6.2 in the ES Traffic and Transport Figures document, are expected to lead to a range of benefits for active travel users on key routes to and from the airport with improved connectivity and safety of routes including those between Longbridge Roundabout, North Terminal and South Terminal; Southern Horley and the airport; and between Balcombe Road and South Terminal with further benefits for active travel users on and around Longbridge Roundabout and those travelling between Longbridge Roundabout and Riverside Garden Park. These measures complement existing key active travel routes including providing enhanced connectivity to routes such as NCR 21 which provides onward connectivity to/from Crawley and are expected to contribute to the achievement of the surface access commitments with respect to mode share targets. In addition to the enhanced connectivity provided to/from the airport, the proposed infrastructure would also provide enhanced connectivity and route options for active travel users travelling between Crawley and destinations such as southern Horley, Riverside Garden Park and the various link roads connected to Longbridge Roundabout.</p> <p>In addition to the above, Commitments 13 and 14 in the SAC, respectively set out that “GAL will continue to use the Sustainable Travel Fund to support measures that will help to achieve the mode share commitments. GAL will maintain the annual increase in the tariff value on air passenger spaces” and that “GAL will also set aside a Transport Mitigation Fund (TMF) to support further interventions, particularly should the need arise for additional measures in the area surrounding the Airport as a direct result of airport-related growth. The intention of this fund is to give assurance that resource will be available for additional interventions in support of the commitments</p>		
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					<p>set out in this document, or to provide mitigation of an unforeseen or unintended impact from the Project. This may relate to physical infrastructure, changes to public transport services or facilities off-airport. Requests for and decisions on allocation from the TMF would be addressed through the Transport Forum Steering Group and sub-groups of it.”</p> <p>In summary, as part of the SAC for the Project, GAL is committed to increasing the active travel mode share for staff who live within walking and cycling distance through the improvements listed above and a range of supporting initiatives to promote and encourage active travel. No further mitigation is required.</p>		
5.98	Active travel infrastructure	Concern regarding indeterminate length of time of temporary diversions for walking and cycling routes during the construction period, including the Sussex Border path and NCN21. The plans to sever the key national cycle network route NCN21 require people on bikes to dismount and push for a significant distance which may not be possible for some people with mobility impairments. The proposed prohibition of cycling over a section of the NCN21 as indicated in the proposals will sever the existing continuous traffic free cycle facility. This section not only forms part of NCN 21 but also the transnational ‘L’Avenue Verte’ route between London and Paris.	CBC	N/A	The proposed temporary diversions of PROW routes during construction have been developed to maintain safety for PROW users during construction. Additional details in relation to the management of temporary PROW diversions is set out in Section 4 of the Environmental Statement Appendix 19.8.1: Public Rights of Way Management Strategy. Further details in relation to the temporary diversion provisions will be developed in consultation with local authorities through the construction stage after the DCO has been granted.	Section 4 of the ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]	
5.99	Active travel infrastructure	The materials presented do not show any assessment of the quality of current active travel provision. The current provision is simply indicated as a given, but this is predominantly of poor quality, and does not meet the required standards. The quality of the existing NCN21 cycle route through the GAL campus is extremely poor, as is the condition of some of the public footpaths which are important	CBC	N/A	<p>The quality of existing active travel provision has been considered through the development of the design of the surface access active travel infrastructure design proposals. Existing site conditions have been discussed with local authorities through forums such as the Active Travel Topic Working Groups.</p> <p>Key proposed improvements to existing active travel provision are summarised below:</p>	<p>Figure 1.2.2 appended to ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 [APP-113]</p> <p>Figure 12.6.2 in the ES Traffic and Transport Figures [APP-059]</p>	

		<p>recreation routes, and this has not been acknowledged by GAL. The information provided does not outline any specific proposals for improvements.</p>			<ul style="list-style-type: none"> • The existing shared use paths and toucan crossings at Longbridge roundabout are to be enhanced with increased segregated provision for pedestrians and cyclists • Existing footways and shared use paths on A23 Brighton Road are proposed to be improved (e.g. through the introduction of a new cyclist ramp eastbound which will enable cyclists to re-join the carriageway running parallel to traffic with safety benefits compared to existing provision where cyclists need to turn onto the live lane directly). • The existing footway on the northern side of A23 London Road is to be widened providing improved connectivity on the northern side of A23 London Road between Longbridge Roundabout and Riverside Garden Park via the existing ramp with onward connectivity to NCR 21 and South Terminal. Improved footway provision also connects to the new signal-controlled crossing on A23 London Road. the existing speed limit on A23 London Road at this location is proposed to be reduced from 50mph to 40mph, which is expected to improve the attractiveness of the route for pedestrian users as well as result in safety benefits for users. • The scheme includes proposals to provide replacement open recreational space in place of the existing Car Park B at on the western side of the London to Brighton rail line (both north and south of Airport Way). The Car Park B sketch landscape concept is illustrated in Figure 1.2.2 appended to ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1. These proposals include new surfaced paths for pedestrians that run north/south parallel to the rail line and Footpath 355a, providing an attractive alternative route for users travelling between the Crescent road and South Terminal. • A new signal controlled crossing is to be introduced across Longbridge Way just west of North Terminal Roundabout to replace the existing informal crossing point utilised by 	<p>Surface Access Highways Plans – General Arrangements [APP-020]</p> <p>Rights of Way and Access Plans [APP-018]</p> <p>ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]</p>	
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					<p>Sussex Border Path (Footpath 346/2Sy), with expected safety benefits for users.</p> <ul style="list-style-type: none"> • Existing uncontrolled pedestrian crossings of the Northway/North Terminal Approach links to North Terminal Roundabout (at similar locations to the Sussex Border Path (Footpath 346/2Sy) crossings of these arms) are to be upgraded to full toucan crossings with full dropped kerb provision, with anticipated safety benefits for users. • A section of the existing pedestrian footway on the western verge of B2036 Balcombe Road is to be upgraded, increasing the path width to 2m in accordance with Design Manual for Roads and Bridges (DMRB) CD 143 guidance. The total verge width provision in this location, including offsets to the carriageway and underbridge abutment provide future proofing for potential future upgrade to shared use path provision. • The existing Footpath 367 Sy which runs parallel to the southern side of Gatwick Spur and connects to Balcombe Road would be diverted locally to the south where the existing alignment clashes with the proposed Gatwick Spur Westbound Diverge and associated drainage infrastructure provision. The replacement path provision would include improved visibility to/from the crossing of Balcombe Road as a result of the increased set back of the Balcombe Road underbridge abutment, which currently limits visibility, from the edge of the carriageway. <p>GAL is also committed to delivering improvements to NCR 21 between Car Park B and a location just south of Gatwick Airport train station, although these improvements may be delivered as part of a separate scheme.</p> <p>These improvements to existing active travel infrastructure will be complemented by the new active travel connections which form part of the scheme, including:</p>		
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					<ul style="list-style-type: none"> • A new predominantly segregated pedestrian and cyclists route is proposed between Longbridge Roundabout and North Terminal on the western side of A23 London Road to supplement the existing NCR 21 connection to the airport with onward upgraded shared use path provision to provide connectivity for cyclists to/from South Terminal via Perimeter Road North. • A new signal controlled pedestrian crossing is proposed at the new signal controlled junction on A23 London Road northeast of North Terminal Roundabout with a new onward footway connection to/from North terminal Roundabout. This location takes account of journey time considerations for pedestrians travelling between southern Horley and the airport. The new more direct route for pedestrians is expected to lead to an increased proportion of staff travelling by foot from this area. • A new east/west connection for pedestrians into Riverside Garden Park on the northern side of Airport Way, with onward connectivity to NCR 21, southern Horley and the northern side of A23 London Road via existing paths in Riverside Garden Park. • A new pedestrian link connecting Gatwick's Ring Road South to B2036 Balcombe Road. • To improve connectivity and safety for cyclists on the northern side of A23 London Road the proposed surface access works include the provision of a new ramp connection to/from Riverside Garden Park providing cyclists with direct access to National Cycle Route 21, with onward connectivity to/from South Terminal and southern Horley. <p>A high level overview of key active travel improvements is illustrated in Figure 12.6.2 in the ES Traffic and Transport Figures. Additional design detail is illustrated in the Surface Access Highways Plans – General Arrangements.</p>		
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					As set out in section 4.1 of the Public Rights of Way Management Strategy, surfaces directly affected through the temporary works together with diversion routes would be restored/be to a suitable condition post construction in accordance with the detailed PRow implementation plans.	
5.100	Active travel infrastructure	Of the little active travel infrastructure shown as part of the revised highway proposals (the A23 London Road – identified as Section 5 in the document), CBC is concerned that GAL have not applied LTN 1/20 standards to the design. The Council considers that the shared use provision is wholly inappropriate in this urban/built-up area context, and that GAL is not showing ambition to deliver high quality infrastructure in the spirit of Gear Change and LTN 1/20 which is needed to enable the switch to active modes.	CBC	N/A	<p>Substantial active travel infrastructure improvements are proposed as part of the surface access works for the scheme as summarised above and as illustrated in Figure 12.6.2 in the ES Traffic and Transport Figures and the Surface Access Highways Plans – General Arrangements. These proposals have been developed with due consideration of the guidance set out in LTN 1/20 and the relevant LCWIPs including the Reigate and Banstead LCWIP (May 2022) and Crawley LCWIP (2021) as well as due consideration of the site context, usage numbers, broader active travel connectivity and route corridors and environmental considerations. The Project's active travel infrastructure proposals include substantial segregated provision for pedestrians and cyclists. Limited sections of shared use path provision are proposed where considered appropriate, e.g. due to site constraints, efforts to minimise environmental impacts such as tree loss or impacts to flood plains and carbon considerations. It is noted that similar localised shared-use path provision forms part of proposals set out in the local LCWIPs on numerous corridors that are under consideration for future upgrade and that LTN1/20 provides guidance on the implementation of shared-use path provision.</p> <p>With respect to the proposed active travel path connection between Longbridge Roundabout, North Terminal Roundabout and South Terminal (located on the western side of A23 London Road), the proposed solution comprises predominantly segregated path provision between Longbridge Roundabout</p>	<p>Figure 12.6.2 in ES Traffic and Transport Figures [APP-059]</p> <p>Surface Access Highways Plans – General Arrangements [APP-020]</p>

					<p>and North Terminal Roundabout (with the exception of over the A23 London Road River Mole bridge) and shared use provision between North Terminal Roundabout and South Terminal.</p> <p>Segregated provision north of North Terminal Roundabout was considered to be warranted for a number of reasons including anticipated relatively high volumes of pedestrians travelling on this route between Car Park Y and North Terminal.</p> <p>Paragraph 5.5.3 of LTN 1/20 summarises the criteria where shared-use path provision may be considered adequate as follows: <i>“However, away from the highway, and alongside busy interurban roads with few pedestrians or building frontages, shared use might be adequate (see Chapters 6 and 8). Such facilities should be designed to meet the needs of cycle traffic, however – including its width, alignment and treatment at side roads and other junctions. Conversion of existing footways to shared use should only be considered when options that reuse carriageway or other (e.g. verge) space have been rejected as unworkable.”</i></p> <p>The shared-use path provision on this active travel route (predominantly located alongside Perimeter Road North and a short section on the A23 London Road bridge over the River Mole) is considered to align with the LTN 1/20 criteria outlined above as follows:</p> <p>1) Site and Road Characteristics The A23 London Road is an inter-urban link between Horley and Crawley, which also facilitates local access to/from Gatwick Airport. It has few building frontages. Gatwick’s internal Perimeter Road North and Gatwick Way roads facilitate connectivity between North Terminal and South Terminal with both roads having partially built-up characteristics.</p>		
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					<p>These links has few building frontages, with Gatwick Police Station as the main exception on the northern side.</p> <p>2) Pedestrian and Cyclist Demand <u>Pedestrian Demand</u> The existing number of pedestrian users on Perimeter Road North/Gatwick Way is relatively low and the design proposals are anticipated to provide more attractive alternative routes for pedestrians to complement the existing infrastructure provision.</p> <p>The pedestrian demand assumptions were informed by results of the walking and cycling survey user counts undertaken for the scheme, with due consideration of the target mode share growth and seasonality considerations. The user count survey indicated that the current volume of pedestrians travelling across Northway and North Terminal Approach with onward movements to/from Perimeter Road North is a fraction of the volume of pedestrians travelling on other internal roads such as Longbridge Way in the existing situation and substantially below 300 movements per hour. The Inter Terminal Shuttle provides connectivity for pedestrians between North and South Terminal on a route that runs broadly parallel with the existing footway between North Terminal and South Terminal and partially explains the low pedestrian usage on this footway.</p> <p>In terms of infrastructure connections between key origins and destinations, NCR21 provides a direct link between southern Horley/Crawley and South Terminal. The Inter Terminal Shuttle provides an alternative route for pedestrians between the terminals, which is particularly convenient for passengers travelling with baggage as well as staff. The proposed new signal-controlled crossing on</p>		
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					<p>A23 London Road would provide a direct link between southern Horley and North Terminal for pedestrians, which would be expected to further reduce pedestrian demand on Perimeter Road North and the western side of A23 London Road. As a result pedestrian demand on the shared-use sections of the route is considered likely to remain relatively low.</p> <p><u>Cyclist Demand</u> Whilst cyclists are envisaged to make use of the proposed shared use path between the terminals, the busier cyclist routes to / from the airport are anticipated to be (i) the new active travel path between Longbridge Roundabout and North Terminal Roundabout and (ii) the NCR 21 connection to South Terminal (from both Horley to the north and Crawley to the south).</p> <p>3) Design to meet the needs of cyclists Due consideration will be given to LTN 1/20 guidance on the design of the shared-use routes. Recommended minimum widths of shared use provision for routes carrying up to 300 pedestrians per hour are given in Table 6-3. Based on the results of the walking and cycling survey counts undertaken for the scheme, it is expected that usage numbers are likely to remain below this level in the design year for the shared use path section with due consideration of the target mode share growth and seasonality considerations. Path widths will be designed accordingly. Crossings and junctions will be upgraded to accommodate shared-use by cyclists (e.g. through the introduction of new signal-controlled toucan crossings across Northway and North Terminal Approach at North Terminal Roundabout.</p> <p>4) Impacts of alternative segregated provision The provision of a shared-use path instead of</p>		
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					<p>a wider segregated path along Perimeter Road North would minimise the environmental impacts of the proposals (e.g. by reducing tree loss associated with the scheme on the northern side of the active travel path). The provision of localised shared-use path provision on the A23 London Road bridge over the River Mole, would minimise the flood risk impacts of the proposed bridge widening. Both sections would reduce the carbon footprints of the proposed works compared to segregated provision.</p> <p>Based on the above, localised shared-use path provision is considered adequate at these locations taking account of the guidance set out in LTN 1/20.</p>		
5.101	Rail services	The capacity of Rail Services remains a concern for the council. Improvements to Gatwick Station are welcomed but do not provide additional space on trains, nor additional services, and there is a need for further information to understand how GAL proposes to ensure services are enhanced to serve the NRP.	CBC	N/A	<p>Crowding on rail services has been assessed and is described in Chapter 9 of the Transport Assessment. A full set of rail data is included in ES Appendix 12.9.2.</p> <p>The Project would increase the number of rail passengers across the day, but based on line loading, Seated Load Factor and standing capacity assessments, no significant increase in crowding on rail services is expected as a result of the Project.</p>	<p>Chapter 9 of the Transport Assessment [APP-258]</p> <p>ES Appendix 12.9.2: Rail Passenger Flows [APP-154]</p>	
5.102	Robotic parking	Re the baseline assuming for 2500 additional robotic spaces. In the absence of any evidence that the technology and capacity is feasible, these should be considered as new proposals as part of the DCO. For the current robotic parking trial (an increase of 100 spaces for a temporary three-month period) CBC agreed that this fell within permitted development, though its response was still considered within the context of the Crawley Borough Local Plan airport-parking policy. The officer report also set out that: 'The comments of WSCC and Surrey CC are also noted and while the proposal is acceptable for a trial period, the proposal if implemented would have potential to significantly increase parking	CBC	N/A	<p>As explained in Section 4.4 of ES Chapter 4, a GPDO Consultation was submitted for a trial of Robotic Parking in 2019 (Crawley Borough Council reference CR/2018/0935/CON). The trial was delayed due to COVID-19 pandemic. It is proposed to extend robotic parking over a larger area of existing car park to provide the additional 2,500 spaces in three phases - 500 spaces in 2024 and 1000 spaces in each of 2025 and 2026. These further phases will also come forward as permitted development subject to GDPO consultations with Crawley Borough Council.</p>	<p>ES Chapter 4: Existing Site and Operation [APP-029]</p>	

		capacity, the full highway impact of which would need to be properly assessed'. The Officer Report can be viewed at: Delegated report_CR20180935CON (1).pdf. The difference between a 100-car increase for a temporary three-month basis, and 2,500 cars in permanence is a significant leap, and effectiveness by no means guaranteed. CBC does not consider that this proposal can be included in the baseline as no formal consultation on details of this proposal have taken place though the Part 8 of the General Permitted Development Order process and at this stage there is insufficient detail to ascertain if such a proposal would be considered as permitted development.					
5.103	Active travel infrastructure	CBC would like to understand whether Active Travel England will be shown all the schemes that are being proposed and have a chance to 'quality control' them to ensure all active travel provision would be delivered to comply with LTN 1/20 – and be in the full spirit of Gear Change to enable a significant shift to active travel.	CBC	N/A	Neither Active Travel England or Sustrans have provided any comment or engagement to date. GAL is in contact with both organisations to ensure their views can be considered.	N/A	
5.104	Active travel infrastructure	In accordance with DMRB Part 5 HD42/17 WCHAR should have been completed prior to highway design to inform opportunities for improvement in active travel infrastructure and connectivity.	CBC	N/A	A DMRB Walking, Cycling and Horse-riding Assessment and Review was undertaken in 2019 as part of the separate Business as Usual signalisation scheme for the North and South Terminal Roundabouts, covering a similar study area to the subsequent NRP WCHAR study area. This 2019 assessment informed early WCH considerations for the scheme and was subsequently supplemented by the production of an additional WCH Assessment and Review, which was developed during 2022 and 2023 in parallel to the development of the design proposals with engagement between relevant members of the design team and other stakeholders. This work was further supplemented by a series of active travel design studies undertaken in consultation with local authorities through the	N/A	

					Active Travel Transport Topic Working Groups in 2022.		
5.105	Active travel infrastructure	Cycling and walking improvements should not be based on current usage, but designed to enable the government's target of 50% of urban journeys by active travel to be achieved.	CBC	N/A	The proposed active travel infrastructure improvements (a summary of which is provided in response to item 5.99 above) have been designed with due consideration of relevant design guidance, including the guidance set out in LTN 1/20, to offer substantial additional capacity on the upgraded routes.	N/A	
5.106	WCHAR surveys	CBC feel that the timing of the user surveys for the WCHAR was not ideal, given the time of year, and that the clocks had reverted from summer time. This will impact on user numbers given the current poor provision.	CBC	N/A	Noted. Due consideration has been given to seasonality considerations with respect to the timing of the user surveys when drawing conclusions regarding current usage volumes and patterns.	N/A	
5.107	CLOS and junction assessments	Have CLOS and junction assessments been made of the proposals – and can these be shared?	CBC	N/A	<p>These tools that form part of the funding process for schemes seeking government funding have not been applied to the NRP proposals. The NRP scheme will be funded by GAL.</p> <p>The scheme has been subject to a Stage 1 Road Safety Audit, which is subject to ongoing discussion with the relevant highway authorities, giving due consideration of safety considerations as well as a DMRB WCH Assessment and Review. The principles behind the CLOS and junction assessments with respect to achieving the desired outcomes for LTN 1/20's five core principles of good cycle design have been given due consideration through the development of the design proposals.</p>	N/A	
5.108	NCN 21 upgrades	CBC would like to understand the specific proposal for the NCN 21 upgrades that are mentioned in the presentation and how these will meet LTN 1/20.	CBC	N/A	<p>Further information was provided in the Active Travel Transport Topic Working Groups on the envisaged improvements to NCR 21. The key features are envisaged to be:</p> <ul style="list-style-type: none"> Localised improvements to NCR 21 route between the southern end of Car Park B allocation just south of the rail station (approx. 50m south of the existing rail footbridge south of the rail station) to include improvements under terminal / station buildings. The nature 	ES Chapter 19 Agricultural Land Use and Recreation [APP-044]	

					<p>of the works is envisaged to comprise improvements to lighting, enhanced segregation of pedestrians and cyclists, wayfinding and road marking improvements.</p> <ul style="list-style-type: none"> • Short section of NCR 21 to be widened south of rail station at localised pinch point (approx. 50m south of the existing rail footbridge south of the rail station). The path is proposed to be widened to the north and east to provide enhanced shared use provision for pedestrians and cyclists. Existing vegetation north of the path at this location is proposed to be removed to accommodate the footprint change. The existing Network Rail fenceline would need to be relocated further east to accommodate path footprint change. (Note: This proposed change would require access to and modification to earthworks within a parcel of Crown Land and is subject to acquiring rights over the parcel of Crown land) <p>The package is to be within the DCO boundary and is to minimise tree loss and impacts to Gatwick Stream.</p> <p>The design detail is to be developed further at a later design stage. The delivery timeline is also to be confirmed with potential that some or all works will be undertaken as part of NRP or as a separate scheme.</p>		
5.109	Active travel infrastructure	Opportunities for active travel connection to Horley's proposed business park should also be explored, CBC would like to understand the timing of delivery of the Active Travel provision, and how this relates to the highway construction schedule. A timetable for construction of active travel improvements is needed – attractive active travel options need to be in place in time for the highways construction period, to give good incentive for people to switch their mode and opportunity to reduce construction congestion.	CBC	N/A	<p>Active travel connections between Gatwick Airport and Horley Business Park are matters for the promoter of that development given they would relate to users of the site accessing Gatwick Airport Railway Station and existing bus stops on or adjacent to the airport and not in connection with airport growth or the Northern Runway Project.</p> <p>Active Travel provision in relation to the Project will be influenced by the timing of the proposed highway works, ensuring that the quality, continuity and safety of existing or new infrastructure can be optimised and implementation is managed efficiently.</p>	N/A	

5.110	ASAS	In relation to the proposed ASAS targets, the ambition for active travel modeshare is very low, given the location of the airport between two urban centres. Schiphol airport has an active travel target of 15% for employees within a 25km radius (aiming to build on the growth of e-bikes).	CBC	N/A	The Surface Access Commitments document sets out the commitment for at least 15% of airport staff journeys originating within 8km of the Airport to be made by active modes. This has been informed by data on staff locations.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.111	Hotel parking	However, the policy includes some important criteria which the Council would expect to be addressed by GAL in justifying its hotel proposals in the DCO, particularly demonstrating that the hotel proposals do not compromise ability of airport to meet operational requirements going forward. Any parking provision at new hotels should be limited and considered in the context of the overarching parking and transport strategies.	CBC	N/A	Table 2.4.1 of the Transport Assessment sets out the car parking provision for the Project. Adequate and appropriate provision will be made for servicing and disabled parking for hotels.	Chapter 2 of the Transport Assessment [APP-258]	
5.112	Car Parking Strategy	The Council welcomes clarification as to the number of new car parking spaces proposed through the DCO, as this number has varied during discussions with the Local Authorities, for example there appears to be discrepancy in the figures between information provided for the Planning A and Transport Topic Working Group meetings that have been held in recent months. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking. We reiterate that, in addition to being provided on-airport, any new airport parking provision must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. The Summer Consultation Document provides a high-level overview of parking need associated with DCO passenger growth, but there is a need for a detailed parking strategy that carefully considers and justifies the car parking	HDC	N/A	The revised proposals for the number of parking spaces required takes account of estimates of mode share, and is based on detailed transport modelling. This means that the increase in use of sustainable modes significantly limits the additional spaces required for growth beyond those that are needed to replace spaces lost during construction. GAL's current s106 obligations require all capacity for airport growth to be accommodated on-site and the proposals assume no increase in off-airport authorised capacity. In order to minimise the amount of additional parking, whilst allowing enough capacity for growth GAL has assumed an improvement in the efficiency of use, higher space occupancy and more flexibility in making spaces available for pre-booking and split between self-park and valet-park. Details of how the modal share aspirations will be achieved are contained in the Surface Access Commitments document.	Table 2.4.1 of the Transport Assessment [APP-258].	

		requirements of the Northern Runway Project in the context of ambitious modal share targets for surface access. Currently, the parking proposals lack any robust justification for the number of spaces. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal share aspirations will be achieved.					
5.113	Car Parking Strategy	Discrepancies between car parking space figures provided in various communications. Detailed Car Parking Strategy required in which GAL demonstrate how a balance is achieved between modal share aspirations, meeting the “sufficient but no more than necessary” parking requirement in the Airport’s S106 legal agreement (Obligation 5.6.1) and deterring unsustainable off airport parking locations, and unauthorised parking. Should include pricing strategy.	HDC	N/A	Table 2.4.1 of the Transport Assessment sets out the car parking provision for the Project. The Surface Access Commitments document sets out the approach to car parking pricing. The proposals for additional parking are provided in the ES Project Description. Proposals for parking capacity both replace capacity lost during construction and provide for a small net increase for growth, taking account of the estimated sustainable mode shares contained in the Surface Access Commitments. The Surface Access Commitments include provision for monitoring noting there is already annual monitoring of parking capacity through the current s106 agreement. Car parking pricing strategy is a commercial matter for GAL and is consistent with our commitments to provide sufficient but no more parking than necessary allowing for our support for increasing use of sustainable transport modes.	Table 2.4.1 of the Transport Assessment [APP-258]. Paragraph 5.2.9 of ES Appendix 5.4.1: Surface Access Commitments [APP-090] ES Chapter 5: Project Description [APP-030]	
5.114	Car Parking Strategy	HDC has had regard to the 2019 Annual Parking Survey that the local authorities adjacent to the airport jointly undertake (the 2019 Survey being the most recent pre-pandemic survey). At the time, this Survey identified that there were 16,508 vacant authorised spaces in total (with 12,070 spaces on-airport and 4,438 authorised spaces off-airport). Additionally, the Parking Survey found that there were 6,644 unauthorised spaces. HDC considers that these findings demonstrate that, despite the large provision of authorised spaces	HDC	N/A	The policy towards authorised off-airport parking, and the enforcement of unauthorised off-airport parking are matters for local authorities. GAL supports the current policies of local authorities that any increase in airport-related parking should take place on-airport as the most sustainable location but that this provision should be consistent with GAL's approach to promoting an increase in the use of sustainable modes. The Surface Access Commitments document submitted with the DCO sets out our proposal to support local authorities with the management and	Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

		available to airport users, unauthorised car parking facilities still exist. The approach of solely providing additional car parking at the airport fails to properly consider other important factors, such as the implications of pricing in the choices airport users make, again something which could be addressed in a robust Car Parking Strategy. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking and all such facilities should be convenient, safe and secure and priced to make illegal off-airport parking less attractive.			enforcement of off-airport parking and traffic issues.	
5.115	Car Parking Strategy	HDC would be keen to explore the possibility of an annual funding contribution from GAL to support the employment of a dedicated Enforcement Officer.	HDC	N/A	The Surface Access Commitments document sets out the commitments to funding for transport initiatives as part of the Project. Commitment 8 sets out funding to support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]
5.116	Car Parking Strategy	The Council is of the view that the provision of car parking at the airport to meet future demand will need to be carefully monitored and, as part of the Development Consent Order, an appropriate mechanism should be attached to the application to ensure that GAL provides parking only as and when it is required, enabling it to be managed in line with the requirements of the S106 legal agreement.	HDC	N/A	The proposals for additional parking are provided in ES Chapter 5 Project Description. Proposals for parking capacity both replace capacity lost during construction and provide for a small nett increase for growth, taking account of the estimated sustainable mode shares contained in the Surface Access Commitments. The additional spaces will only be made available once there is evidence of need through monitoring of growth. The Surface Access Commitments include provision for monitoring noting there is already annual monitoring of parking capacity through the current s106 agreement.	ES Chapter 5 Project Description [APP-030] Transport Assessment [APP-258]
5.117	Car Parking Strategy	The Council accepts that several of the parking proposals have already been through the EIA screening process with Crawley Borough Council and may therefore reasonably form part of the baseline. However, this isn't the case for the 2,500 additional robotic spaces being proposed which should be considered as new proposals as part of the DCO. We	HDC	N/A	As explained in Section 4.4 of ES Chapter 4, a GPDO Consultation was submitted for a trial of Robotic Parking in 2019 (Crawley Borough Council reference CR/2018/0935/CON). The trial was delayed due to COVID-19 pandemic. It is proposed to extend robotic parking over a larger area of existing car park to provide the additional 2,500 spaces in three phases - 500 spaces in 2024 and 1000 spaces in each of	ES Chapter 4: Existing Site and Operation [APP-029]

		are therefore of the view that GAL should undertake the necessary screening with Crawley Borough Council to support inclusion of the 2,500 spaces to ascertain whether these qualify as Permitted Development. Otherwise, these spaces should be removed from the baseline.			2025 and 2026. These further phases will also come forward as permitted development subject to GDPO consultations with Crawley Borough Council.		
5.118	Mitigation	HDC should be invited to participate in Joint Steering Groups to be involved in draft proposals for mitigation – i.e., Local Highways Fund, Public Transport Infrastructure Fund, Active Travel Infrastructure Fund and Local Parking and Traffic Monitoring given the proximity of the District to the airport's boundary.	HDC	N/A	The Surface Access Commitments document sets out commitments to funding. Section 6.2 of the Surface Access Commitments describes the monitoring commitments and the need to engage and present the Annual Monitoring Report to the Transport Forum Steering Group (TFSG). The TFSG consists of GAL, local highway and planning authorities, transport operators and agencies, business and passenger representatives and other interested parties.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.119	Assumptions and forecasts	Fundamental questions around assumptions and forecasts which still need to be addressed and clarified (see Section 42 Consultation response).	HDC	N/A	The model assumptions and forecasting have followed TAG guidelines and been discussed directly with WSCC at engagement sessions regarding the transport modelling and additionally at the relevant Topic Working Groups. Detailed information regarding the transport modelling is included within Annex B (Strategic Transport Modelling Report) of the Transport Assessment.	Annex B: Strategic Transport Modelling Report of Transport Assessment [APP-260]	
5.120	Railway capacity	Concerns around rail capacity, particularly given uncertainty around the Croydon Area Remodelling Scheme (CARS) and subsequent impact on road network if rail capacity not adequately considered.	HDC	N/A	Crowding on rail services has been assessed, as described in Chapter 9 of the Transport Assessment. A full set of rail data is included in ES Appendix 12.9.2. The modelling excludes CARS in both the future baseline and with Project scenarios (see section 9.4 of the Transport Assessment). The Project would increase the number of rail passengers across the day, but based on line loading, Seated Load Factor and standing capacity assessments, no significant increase in crowding on rail services is expected as a result of the Project.	Chapter 9 of the Transport Assessment [APP-258] ES Appendix 12.9.2: Rail Passenger Flows [APP-154]	
5.121	Transport modelling	HDC have previously requested a focused meeting with GAL's transport consultants and WSCC transport team, to discuss transport modelling outputs and	HDC	N/A	GAL has held several meetings with WSCC and SCC as relevant highway authorities to discuss modelling matters including base models, forecasting approach and model outputs, and modelling outputs were	N/A	

		how these relate to the transport network in the District.			discussed more widely in Topic Working Groups.	
5.122	Transport modelling	It is noted that in PEIR Chapter 12, paragraph 12.11.3 “no more traffic at Heathrow” is assumed, should a third runway be built. The Council queried how realistic this is. The provision of a third runway at Heathrow Airport is Government policy and therefore is currently anticipated to be delivered. Whilst the narrative from Heathrow Airport is a “no more traffic” scenario, this is yet to be properly scrutinised through the Heathrow DCO process so it is considered that additional traffic as a result of a third runway should be included in the transport modelling.	HDC	N/A	This relates to information from the time of the PEIR. Paragraphs 8.1.4 to 8.1.6 of the Transport Assessment describe the approach taken to the third runway at Heathrow, which is not included in the assessment of the Project. This approach provides a conservative assessment from a traffic and transport perspective. If Heathrow's third runway was to come forward, traffic levels at Gatwick would be likely to decline in the period immediately following the opening of the third runway, meaning that the impacts of the Project, such as traffic and therefore associated noise and emissions would be lower in the 2032 assessment year than are reported in the DCO Application. By not including the Heathrow third runway, the 2032 assessment is therefore conservative. However, by 2047, there would be little difference between demand at Gatwick Airport with or without the Heathrow third runway and accordingly the outcomes reported in the DCO Application for this scenario would be unchanged irrespective of developments at Heathrow.	Paragraphs 8.1.4 to 8.1.6 of the Transport Assessment [APP-258]
5.123	Impacts on road network	Lack of consideration given to impacts on the road network beyond the immediate airport boundary (e.g., A264 (including cumulative effects), A24, A29, A272, and rural routes which suffer rat-running as those travelling to the airport by car look to avoid congestion on main routes). Scale of mitigation required around the airport suggests it is unlikely no mitigation will be required elsewhere so concern that this is the conclusion reached by GAL. The use of the M23 Spur for a proportion of final journeys to the airport does not mitigate the use of roads in the wider area for earlier parts of the same journey.	HDC	N/A	The transport modelling covers a large area which includes all roads in neighbouring Districts, as indicated in Diagram 5.3.3 of the Transport Assessment. A magnitude of impact assessment was undertaken across the modelled area to understand the impact of the Project on junctions and links within the model. This process is outlined in Chapters 5 and 12 of the Transport Assessment and in section 6.12 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. The assessment results are presented in Section 12.8 of Annex B of the Transport Assessment.	Chapters 5, 12 and 13 of Transport Assessment [APP-258] Sections 6.12 and 12.8 of Annex B: Strategic Transport Modelling Report of the Transport Assessment [APP-260]
5.124	Transport modelling	Conflict between findings in Horsham and Crawley transport modelling, which shows congestion at J10 of the M23 and GAL's own findings that J9 improvements will	HDC	N/A	The performance of Junction 10 has been reviewed with National Highways and did not flag material concerns beyond the modelling needing some signal refinement in 2029 at the	Section 11.7 of Transport Assessment Annex B: Strategic

		lead to a reduction in traffic throughput at J10.			<p>NB offslip / circulatory node. Paragraph 11.7.17 of Transport Assessment Annex B outlines that each of the onslip/offslips and mainline through Junction 10 see increased volumes at the AADT level but also on a time period basis. This is supported by the plots presented in the reporting.</p> <p>It is worth noting that there is a network coding change due to the improvements at this junction - this has the consequence of representing the change as reductions on some elements of the merge and diverges as a consequence of network structure change. As such given the zoomed out nature of some of the plots within the reporting it may appear that there are reductions. The immediate links adjacent to the junction (on / offslips) are consistent in the base and forecast and all show increases.</p>	Transport Modelling Report [APP-260]	
5.125	Transport modelling – detailed information requested	<p>In order to reach an informed view, the Council flags the need for following:</p> <ul style="list-style-type: none"> • A draft Transport Assessment, draft Air Surface Access Strategy (ASAS) and Sustainable Travel Plan to be available for comment ahead of the formal DCO application, to include: • A core modelling scenario to include all growth likely to come forward (i.e. West of Ifield, Horley Business Park etc.) by way of a 'worst case scenario' that takes account of cumulative impacts, transparent assumptions and appropriate sensitivity tests • A clear breakdown and analysis of existing and proposed staff and passenger car parking respectively, including the nature of provision and relevant charging / restrictions • A strategy for reducing off-airport parking • Confirmation of mode share targets, and the impact these will make against a 'business as usual' scenario 	HDC	N/A	<p>The approach taken to considering future development West of Ifield and at Horley Business Park is described in Annex B (Strategic Transport Modelling Report) of the Transport Assessment. These developments are not sufficiently certain to be included in the core scenarios for the assessment of the Project, but have been included in a separate cumulative scenario which is described in Chapter 14 of Annex B of the Transport Assessment.</p> <p>Table 2.4.1 of the Transport Assessment sets out the car parking provision for the Project.</p> <p>The committed mode shares are contained in the Surface Access Commitment document, along with commitments GAL is making to surface access interventions.</p> <p>Chapter 7 of the Transport Assessment sets out the interventions tested in the strategic transport modelling which has demonstrated how the committed mode shares can be achieved.</p>	Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

		<ul style="list-style-type: none"> • A strategy to achieve those mode share targets, including consideration of maximising opportunities for connecting new growth areas and existing populations to the airport (for example new multi-mode link from A264 to A23 i.e. the Crawley Western Link Road) • A package of funded mitigation improvements that go well beyond just on-site / spur road highways and other improvements, worked up in collaboration with local planning authorities • Presentation of the above in a non-technical summary report. 					
5.126	Active travel	Insufficient consideration has been given to future proofing active travel connections outside the core scenario, for instance, to the West of Ifield development.	HDC	N/A	<p>The proposed active travel infrastructure improvements (a summary of which is provided in response to item 5.99 above) will provide substantial additional capacity on the upgraded routes that would accommodate substantial future growth in active travel users on these routes.</p> <p>Matters related to active travel connections to the West of Ifield development are for the promoters of this site to present.</p>	N/A	
5.127	Local bus network	GAL has not proposed any local bus enhancements for Horsham District, including upgrades to existing local services. This is disappointing considering the proximity of many parts of the District to the airport. More detail required on the coach route proposed between Worthing and Gatwick, which would pass through Horsham.	HDC	N/A	The Surface Access Commitments document sets out the proposed bus and coach routes, and how these, or others which result in an equivalent level of public transport accessibility, would be implemented and funded.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.128	Mitigation measures	None of the mitigation discussed in the Summer 2022 Consultation Document is contained within Horsham District. However, it is noted that a significant amount of additional capacity is being created with extra lanes, through road widening schemes and new flyovers, amongst other interventions. Whilst these proposals are designed to mitigate the traffic impacts immediately around the	HDC	N/A	Chapters 12 and 13 of the Transport Assessment cover the strategic modelling and local VISSIM modelling which has been undertaken. Further technical details are contained in Annexes B and C of the Transport Assessment. The majority of the traffic associated with the Project is expected to use strategic roads; an assessment has been undertaken on the magnitude of impact at junctions across the whole of the road	Transport Assessment [APP-258] Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] Transport Assessment Annex C: VISSIM	

		Airport, it is not clear at this stage what consideration has been given to mitigation beyond its immediate vicinity. Clearly GAL anticipates a significant increase in traffic volumes accessing the Airport to justify such significant road improvements and it is therefore logical to conclude that adverse impacts may be experienced beyond the immediate locality into adjoining local authority areas, such as Horsham District, including key connecting routes and more rural roads.			network covered by the strategic transport model. No significant adverse impact is identified on local routes. It should also be noted that the Surface Access Commitments document includes commitment to a Transport Mitigation Fund to provide mitigation of an unforeseen or unintended impact from the Project.	Forecasting Report [APP-261] Section 5.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.129	Surface access mitigation	HDC has raised a number of comments in relation to Traffic and Transport issues and at this stage it is difficult to see how GAL is planning to respond to this feedback. Much of the focus for the discussions on Surface Access mitigation is on the immediate impact on and around the Airport, with little acknowledgement of the wider transport impacts beyond the immediate airport. GAL is projecting a significant uplift in passenger throughput which will have implications for travel within the District, particularly given the potential for in-combination effects as a result of planned and potential further development. For example, the A264 is an important east-west route connecting Horsham with Crawley, the A24 to the west and the M23 to the east, and forms an important part of the road network providing forward destination links to and from the Airport.	HDC	N/A	Chapter 12 of the Transport Assessment explains the strategic modelling work that has been undertaken and is accompanied by a comprehensive technical report contained in Annex B (Strategic Transport Modelling Report) of the Transport Assessment. The majority of the traffic associated with the Project is expected to use strategic roads and there would thus be limited impact on local routes. Annex B of the Transport Assessment contains a series of link flow plots from the strategic modelling which demonstrate the low level of change expected on local roads. The assessment also include consideration of the magnitude of impact at junctions within the coverage of the model.	Transport Assessment [APP-258] Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.130	Cumulative effects	Concerns around the cumulative effects on rail services in the District with an uplift in passenger numbers using the services on the Arun Valley Line which travels through the District including connections between Horsham and Crawley. This part of the route, especially, has the potential to see increased passenger numbers from identified nearby development in the north of the District in-combination with the Northern Runway Project.	HDC	N/A	The future baseline scenarios contain developments with an uncertainty level of 'near certain' or 'more than likely', in accordance with TAG Unit M4. Paragraphs 9.6.2 and 9.6.3 and Table 9.6.1 of the Transport Assessment explain the assessment of the peak Seated Load Factor on the Arun Valley Line. This shows that in the future baseline and with Project scenarios, there would be seats available and no crowding	Paragraphs 9.6.2 and 9.6.3, Table 9.6.1 of the Transport Assessment [APP-258] ES Appendix 12.9.2: Rail Passenger Flows [APP-154]	

					<p>issues are expected. Therefore no further detailed analysis has been necessary.</p> <p>The full set of rail data, including information for the Arun Valley Line, is contained in ES Appendix 12.9.2.</p>		
5.131	Impacts on highway network	<p>The Council notes that the highway network flow changes as a result of the NRP in 2047 have been assessed against the 2047 BAU with the majority of impacts found to affect the M23 and M25. It is further noted that no adverse impacts have been identified on the A24 or any other routes in Horsham District. The Council considers that this approach does not highlight where there are existing capacity issues. If junctions are already congested in the BAU scenario, then the impact of the scheme will be constrained by the limited capacity for traffic to grow. The Horsham Transport Study (2021) highlights that there are a number of junctions along the A24 where there are capacity issues which will be exacerbated by further development. It will be important, therefore, for GAL to provide details of which junctions are congested in the BAU scenario. Whilst the Council does not expect GAL to solve existing problems, it is necessary for GAL to demonstrate that there is adequate capacity to serve the NRP and would not lead to problems for existing users and / or overload existing infrastructure. In these circumstances, the Council will expect adequate mitigation to address any adverse impacts of the scheme.</p>	HDC	N/A	<p>A magnitude of impact assessment was undertaken across the modelled area to understand the impact of the Project on junctions and links within the model. This process is outlined in Chapters 5 and 12 of the Transport Assessment and in Section 6.12 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. The assessment results are presented in section 12.5 of the Transport Assessment and in section 12.8 of Annex B of the Transport Assessment.</p> <p>An assessment of future baseline conditions is provided in section 11.8 of Annex B of the Transport Assessment - it is noted that there are changes in road layout on the A264/A24 which lead to changes in traffic flow. Section 11.9 of Annex B of the Transport Assessment highlights small increases in journey time along some sections of the corridor, but reductions elsewhere following capacity enhancements.</p>	<p>Chapters 5 and 12 of Transport Assessment [APP-258]</p> <p>Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] - Sections 6.12, 11.9 and 12.8</p>	
5.132	Car Parking Strategy	<p>GAL are proposing 1100 parking spaces, this follows a change since the Summer 2022 Consultation (down from 4200 spaces). However there is no evidence to justify how this projected need from the NRP has resulted in this 1100 figure.</p>	MVDC	N/A	<p>The revised proposals for the number of parking spaces required takes account of estimates of mode share, and is based on detailed transport modelling. This means that the increase in use of sustainable modes significantly limits the additional spaces required for growth beyond those that are needed to replace spaces lost during</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	

					<p>construction. GAL's current s106 obligations require all capacity for airport growth to be accommodated on-site and the proposals assume no increase in off-airport authorised capacity. In order to minimise the amount of additional parking, whilst allowing enough capacity for growth GAL has assumed an improvement in the efficiency of use, higher space occupancy and more flexibility in making spaces available for pre-booking and split between self-park and valet-park. Details of how the modal share targets will be achieved are contained in the Surface Access Commitments document</p>		
5.133	Car Parking Strategy	There is a need for a detailed parking strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project in the context of ambitious modal share targets for surface access.	MVDC	N/A	<p>The revised proposals for the number of parking spaces required takes account of estimates of mode share, and is based on detailed transport modelling. This means that the increase in use of sustainable modes significantly limits the additional spaces required for growth beyond those that are needed to replace spaces lost during construction. GAL's current s106 obligations require all capacity for airport growth to be accommodated on-site and the proposals assume no increase in off-airport authorised capacity. In order to minimise the amount of additional parking, whilst allowing enough capacity for growth GAL has assumed an improvement in the efficiency of use, higher space occupancy and more flexibility in making spaces available for pre-booking and split between self-park and valet-park. Details of how the modal share targets will be achieved are contained in the Surface Access Commitments document</p>	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.134	Car Parking Strategy	The council is of the view that a mechanism is required to ensure that the amount of parking provision on-airport is provided only when it is needed, and this must be monitored, therefore enabling it to be managed in line with the requirements of the S106 legal agreement. Whilst it is appreciated that an element of flexibility is required by both	MVDC	N/A	<p>The proposals for additional parking are detailed in the Project Description. Proposals for parking capacity both replace capacity lost during construction and provide for a small nett increase for growth, taking account of the estimated sustainable mode shares contained in the Surface Access Commitments.</p>	ES Chapter 5: Project Description [APP-030] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

		GAL and the Local Authorities to ensure 'sufficient but no more' parking provision, GAL's wide-ranging permitted development rights provide significant scope for new parking coming forward on airport without the need for planning permission. The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106 was suggested. The Council welcome GAL's willingness to discuss options, with possible mechanisms including a 'requirement' on the DCO or an obligation within the S106 legal agreement. We note that in this event, GAL would retain the option to apply for planning permission, thus enabling new parking proposal to be assessed in light of a demonstrable need and within the context of the sustainable surface access strategy.			The Surface Access Commitments include provision for monitoring noting there is already annual monitoring of parking capacity through the current s106 agreement.		
5.135	Bus and Coach Provision	Improved bus and coach provision is needed for early morning and late-night flights, especially if considering increasing forecourt charges when there are no other options for accessing the airport at these times. Proposed provision is insufficient.	MVDC	N/A	<p>The need for early morning and evening services is already recognised by GAL and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as strengthening weekend services. GAL has worked with Metrobus to develop an extensive, 24-hour, local bus network. GAL is currently funding some of these local bus services through its Sustainable Transport Fund. Typically, GAL will provide Metrobus with catchment information and Metrobus will provide a proposed route and a funding plan for the period before the route is expected to become commercially viable.</p> <p>The Surface Access Commitments document sets out the commitments GAL is proposing to make in relation to enhancing bus and coach services.</p>	<p>Paragraphs 11.2.9-11.2.10 of Transport Assessment [APP-258]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	
5.136	Rail Strategy	With so much of the NRP hinging on the success of the Gatwick Rail Project, it is expected that accompanying Rail Strategies and plans be more detailed	MVDC	N/A	<p>Clarification is required on the reference to the "Gatwick Rail Project". The assessment reported in Chapter 9 of the Transport Assessment shows no significant increase in crowding on rail services is expected as a</p>	<p>Chapters 9 and 10 of the Transport Assessment [APP-258]</p>	

		<p>and demonstrate deliverability. This is not currently the case.</p> <p>While improvements are welcomed, the capacity of Rail Services remains a concern for the council, especially given the issues with the Selsdon Junction and funding issues with East Croydon Station upgrades. Further detail and more deliverable assurances and actions are needed to understand how GAL proposes to ensure services are enhanced to serve the NRP.</p>			<p>result of the Project. Chapter 10 of the Transport Assessment provides an assessment of the performance of Gatwick Station which shows that the Project would not require any additional works beyond those already committed to the station.</p>		
5.137	Rail, Coach and Bus Strategy	<p>Need a process whereby GAL liaises with the rail, coach and bus operators to get a better understanding of travel behaviour and how this may look in the future, and that this is taken into consideration when GAL develops their ASAS.</p>	ESCC	N/A	<p>GAL routinely liaises with public transport operators, whether separately or as part of discussions with the Transport Forum Steering Group and wider Gatwick Transport Forum.</p>	N/A	
5.138	Bus Connections	<p>Improve bus connections to East Sussex to reduce car use and to enable longer distance inter-urban journeys to be undertaken by public transport rather than by car.</p>	ESCC	N/A	<p>The Surface Access Commitments document sets out the proposed commitments to improve bus and coach services. It includes a number of identified services which are included in the modelling work, and GAL is committed to providing reasonable financial support in relation to those services, or others which result in an equivalent level of public transport accessibility.</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	
5.139	Uckfield route	<p>Unclear as to why the Uckfield route is categorised as a 'coach' route. This should be provided as a bus service, permitting local travel between bus stops.</p>	ESCC	N/A	<p>The intervention included in the modelling work is an express bus or coach service between Uckfield – East Grinstead – Gatwick (hourly in peaks, two-hourly at other times).</p>	<p>Paragraph 11.3.15 of the Transport Assessment [APP-258]</p>	
5.140	Bus Strategy	<p>There needs to be an integrated approach to public transport provision as there is an ESCC funded local bus service running parallel to the proposed coach route for the greater part of the route, between Uckfield and East Grinstead (this is currently the 2 hourly Monday to Friday daytime only route 261).</p>	ESCC	N/A	<p>This is noted. The routes identified in the Surface Access Commitments document, and explained in section 11.3 of the Transport Assessment, are included in the modelling and would form part of the suite of measures to deliver the committed mode shares. Nevertheless, as set out in the Surface Access Commitments document, further discussions with bus operators will be required on the specifics of delivering these routes, or alternative routes which provide an equivalent level of public transport accessibility.</p>	<p>Section 11.3 of Transport Assessment [APP-258]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	

5.141	Bus Strategy	Recommend extending the 261 route beyond East Grinstead so as to provide a direct service between Uckfield and Gatwick Airport. We wish to see the operational hours of the service extended to include early mornings, evenings and weekends. This would need a funding contribution from Gatwick Airport.	ESCC	N/A	The Surface Access Commitments document sets out the proposed commitments to improved bus and coach services. The services identified and included in the modelling work do not include extending route 261. GAL is committed to provide reasonable financial support in relation to the services identified, or others which result in an equivalent level of public transport accessibility, in order to achieve the committed mode shares	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.142	Gatwick – Crowborough service	Scope for a Gatwick – Crowborough service; suggest a separate ‘new’ route due to its geographical location and the limitations of the road network. There would be scope for a Crowborough – Gatwick route to run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick. Metrobus should be engaged with, as they run bus services in the Forest Row, East Grinstead, Crawley and Gatwick areas	ESCC	N/A	The Surface Access Commitments document sets out the proposed commitments to improved bus and coach services. The services identified and included in the modelling work do not include a route between Gatwick and Crowborough, although enhanced services via East Grinstead to Uckfield and Royal Tunbridge Wells are included in the proposals. GAL is committed to provide reasonable financial support in relation to the services identified, or others which result in an equivalent level of public transport accessibility, in order to achieve the committed mode shares.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.143	Demand Responsive Transport (DRT)	Any new services, with Demand Responsive Transport (DRT) in mind, should: <ul style="list-style-type: none"> • be wholly integrated with conventional public transport (i.e. integrated ticketing and service design) • complement existing bus services, i.e. only runs at times/to places when conventional bus services are not available • Where feasible, feed into conventional services (i.e. first mile/last mile principles). This does require high levels of integration, service reliability, public information, waiting facilities and ticketing. In East Sussex we would see DRT potentially feeding the proposed Uckfield/Crowborough links using the 	ESCC	N/A	Demand Responsive Transport (DRT) services are not currently included in the modelling work or the proposed surface access interventions for the Project. Opportunities to implement Demand Responsive Transit (DRT), Demand Responsive Service (DRS), Dial-a-Ride Transit (DART) or Flexible Transport Services (FTS) during the construction period are identified in the Outline Construction Workforce Travel Plan.	ES Appendix 5.3.2: Code of Construction Practice – Annex 2: Outline Construction Workforce Travel Plan [APP-086]	

		above principles, rather than running all the way to/from the Airport.					
5.144	Uckfield – Gatwick service extension	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.	ESCC	N/A	The Surface Access Commitments document sets out the proposed bus and coach routes, and how these, or others which result in an equivalent level of public transport accessibility, would be implemented and funded.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.145	Impacts on Ashdown Forest	Concern over the impacts of the NRP on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, Special Area of 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).	ESCC	N/A	The air quality assessment has included the calculation of air quality impacts at Ashdown Forest for consideration of significance by the scheme ecologists. These data have been used to inform the Habitats Regulations Assessment for the Project which concludes there would be no adverse effect on integrity from changes to air quality arising from the Project either alone or in combination.	ES Chapter 13: Air Quality [APP-038] ES Appendix 9.9.1: Habitats Regulations Assessment Report – Part 1 and Part 2 [APP-134 and APP-135]	
5.146	Highway Mitigation	WSCC is concerned about the performance of the proposed highway mitigation, which has not been demonstrated through a transport assessment. The proposed highway mitigation would increase some journey times (including potentially for emergency response vehicles) and result in a redistribution of traffic, including from the strategic to the local highway network. However, it has not been possible to assess this due to the lack of information provided	WSCC	N/A	Journey times are reported in section 6.6 of Annex C (VISSIM Forecasting Report) of the Transport Assessment.	Transport Assessment Annex C: VISSIM Forecasting Report [APP-261]	
5.147	Highways Report	Summary from main report - lack of evidence, pandemic implications on staff levels, assessments do not take into account the site-specific impacts of emerging large development sites in the area; these include West of Ifield, Gatwick Green, and Horley Business Park. Mitigation levels are unclear or limited (including active travel). Reactive, not proactive.	WSCC	N/A	Annexes B to D of the Transport Assessment provide evidence from the extensive modelling work which has informed the impact assessment of the Project. Paragraph 8.2.8 of the Transport Assessment comments on the implications of the pandemic for staff levels: <i>"Following the pandemic, there generally appears to be an increase in hybrid working at many employers, with staff dividing their working time between working from home and working at their employer's place of work. However, at Gatwick, a significant proportion of airport workers are not practically able to work from home because the nature of their</i>	Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] Section 12.11 of the ES Chapter 12: Traffic and Transport [APP-037] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	

					<p><i>job means that it can only be performed in person. The modelling work therefore assumes that employee attendance levels on site will be similar to those experienced pre-pandemic. This is a robust assumption as it leads to the assessment testing higher trip generation to the Airport and is likely to reflect a typical mid-week day. The transport modelling also assumes that the distribution of new employment will be comparable to existing employment."</i></p> <p>The future baseline scenarios contain developments with an uncertainty level of 'near certain' or 'more than likely', in line with guidance in TAG Unit M4. This and the forecasting assumptions are set out in detail in Annex B (Strategic Transport Modelling Report) of the Transport Assessment. Developments at Horley Business Park, West of Ifield and Gatwick Green are classed as less certain and therefore have not been included in the future year models. However, a separate cumulative development scenario has been created which includes these developments, as local stakeholders have indicated a wish to understand the potential cumulative traffic and transport impacts related to these developments and the Project. The results from these runs are assessed as cumulative effects in section 12.11 of ES Chapter 12 Traffic and Transport . Further information on these runs is provided in Chapter 14 of Annex B of the Transport Assessment.</p> <p>The Project includes the provision of active travel infrastructure as part of the proposed highway works, together with a range of other measures set out in the Surface Access Commitments document. The assessment in both the Transport Assessment and ES Chapter 12: Traffic and Transport indicates that with these measures in place, which form part of the Project, no other measures are</p>		
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					required to mitigate the effects of the Project in relation to surface access.		
5.148	Network Rail and National Highways schemes	Summary issue - There are Network Rail and National Highways schemes included in the future baseline assessments that are not fully funded or going through the relevant statutory planning process; these include the Croydon Area Remodelling Scheme (CARS), a strategic rail improvement, and the Lower Thames Crossing (LTC), a strategic highway improvement.	WSCC	N/A	This comment relates to the information at the time of the PEIR and the modelling was updated for the DCO Application with an updated uncertainty log compiled and core schemes included. CARS was removed from the model scenarios, but LTC meets the TAG criteria for being included within the core modelling scenarios.	Chapter 9 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.149	Traffic and transport access	Summary - need to address - concerns related to traffic and transport access, including the impact of other strategic development and forecasting assumptions about mode share for both passengers and staff;	WSCC	N/A	The future baseline scenarios contain developments with an uncertainty level of 'near certain' or 'more than likely'. This and the forecasting assumptions are summarised in Chapters 6 to 8 of the Transport Assessment and set out in detail in Chapters 6 to 8 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment.	Chapters 6 to 8 of Transport Assessment [APP-258] Chapters 6 to 8 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.150	Road Traffic Collisions	(App 5.3.3) There is a concern that there will be an increase in Road Traffic Collisions as a result of the increased infrastructure and road networks surrounding the airport, that will have an impact on emergency services and WSCC Highways departments.	WSCC	N/A	Temporary traffic management measures during construction will give due consideration to safety requirements and will be developed in consultation with relevant highway authorities and emergency services representatives to ensure that the traffic collision risks are adequately mitigated and that due consideration is given to emergency services access requirements. In addition to the indicative construction sequencing information set out in ES Appendix 5.3.3: Indicative Construction Sequencing, further information on how the scheme will manage safety considerations during construction are set out in the ES Appendix 5.3.2 Code of Construction Practice including Annex 3: Outline Construction Traffic Management Plan including section 7 of this document.	ES Appendix 5.3.3: Indicative Construction Sequencing [APP-088] ES Appendix 5.3.2: Code of Construction Practice [APP-082] ES Appendix 5.3.2: Code of Construction Practice Annex 3: Outline Construction Traffic Management Plan [APP-085]	
5.151	Assessment of severance	12.4.38 - The assessment of severance based on traffic flow fails to take account of the impacts of changes in the composition of traffic. The criteria for assessment of severance should also	WSCC	N/A	The assessment of severance is in accordance with Institute of Environmental Management and Assessment (IEMA) guidance. The assessment in terms of the impact of the increase in HGVs and the resulting traffic composition is contained in the	Section 12.4 of ES Chapter 12: Traffic and Transport [APP-037]	

		take into account the impact of an increasing number of HGVs.			pedestrian and cyclist amenity assessment. Section 12.4 of ES Chapter 12: Traffic and Transport outlines the methodology	
5.152	Highway Junctions	Table 12.4.6 Junctions operating over 85% of volume/capacity over an average time period can be very sensitive to increases in traffic volume leading to delays and traffic rerouting. A 4% increase in traffic volume on a link or junction operating at 99% of volume to capacity is likely to have a noticeable impact on users and sensitive receptors as volume would exceed capacity yet the proposed approach would categorise the magnitude of impact as 'low'. The V/C ranges used to classify the conditions at the junctions should be amended to; not significant (<85%), minor (85-90%), moderate (90-95%) and major (95%). This would ensure that changes taking a junction over capacity are either categorised as medium or high.	WSCC	N/A	This comment relates to the information at the time of the PEIR. The criteria used in the magnitude of impact assessment have been updated for the DCO Application and are set out in Chapter 12 of the Transport Assessment, Annex B (Strategic Transport Modelling Report) of the Transport Assessment and in ES Chapter 12: Traffic and Transport (Table 12.4.6).	Chapters 5 and 12 of Transport Assessment [APP-258] Table 31 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] ES Chapter 12: Traffic and Transport [APP-037].
5.153	Staff mode share targets	12.6.61 - The acknowledgement of the importance of 'push' measures to achieving mode share targets is welcome. Although increasing parking and forecourt charges are stated to have been included in the strategic modelling for passengers, there are no similar measures for staff. GAL should introduce similar measures to support the achievement of staff mode share targets.	WSCC	N/A	The modelling for the assessment includes an intervention representing the introduction of additional restraint on staff car parking activity. For modelling purposes this is configured as an increased parking charge, although GAL has yet to determine the most appropriate means of introducing additional restraint.	Chapter 7 of Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]
5.154	Passenger Mode share target	12.6.62 - There is a gap between the impact of the measures assessed in 2038 and 2047 and the passenger mode share target of 60%. GAL should introduce additional measures to fill the gap between the assessed impact and the mode share target.	WSCC	N/A	The reference to the mode share target is from the PEIR and is now superseded. The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment sets out the interventions which have been tested in the model to demonstrate the mode shares are achievable.	Chapter 7 of Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]
5.155	Staff Parking Spaces	12.6.62 - The impact of measures on sustainable transport mode share for staff is stated in Appendix 12.9.1 para 7.5.5 to achieve a 47% mode share. GAL should	WSCC	N/A	The reference to the mode share target is from the PEIR and is now superseded.	Chapter 7 of Transport Assessment [APP-258] ES Appendix 5.4.1:

		introduce additional measures to ensure the proposed mode share target of 60% is achievable and provide a rationale for the number of staff parking spaces due to be provided and the approach to management (e.g., pricing) of these spaces.			The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment sets out the interventions which have been tested in the model to demonstrate the mode shares are achievable. Table 2.4.1 of the Transport Assessment sets out the car parking provision for the Project.	Surface Access Commitments [APP-090] Table 2.4.1 of the Transport Assessment [APP-258]	
5.156	Trip Generation Forecast	12.9.3 - PEIR Chapter 5 Paragraph 5.3.99 states that any construction work in close proximity to existing runways and taxiways would be scheduled to take place overnight. It is unclear how this scheduling has influenced the construction trip generation forecast in Paragraph 12.9.3. Further information should be provided on the assumptions used to assess construction traffic impacts	WSCC	N/A	This comment refers to the information at the time of the PEIR and material which has since been updated for the DCO Application. Chapter 15 of the Transport Assessment provides information about construction impacts relevant top surface access. The Outline Construction Traffic Management Plan and Outline Construction Workforce Travel Plan set out proposals for the management of construction vehicle and work movements and activities.	Chapter 15 of the Transport Assessment [APP-258] ES Appendix 5.3.2 Code of Construction Practice Annex 2: Outline Construction Workforce Travel Plan [APP-086] ES Appendix 5.3.2 Code of Construction Practice Annex 3: Outline Construction Traffic Management Plan [APP-086]	
5.157	Demand Forecast	Appendix 12.9.1, Part 1, 6.1.9 - The demand forecast for 2021 appears overly optimistic. It is unclear what effect this will have on the future forecast scenarios. GAL should revise the forecast to take account of the ongoing impacts of the COVID19 pandemic.	WSCC	N/A	Changes to the assessment were made subsequent to published material for the Autumn 2021 consultation, to which this comment refers. Information relating to the forecast scenarios for airport growth are included in the Forecast Data Book within the DCO Application and reflected in the Transport Assessment and transport modelling.	ES Appendix 4.3.1: Forecast Data Book [APP-075] Transport Assessment [APP-258 to APP-263]	
5.158	Demand Forecast	Appendix 12.9.1, Part 1, 6.1.9 - Demand forecasting is inherently uncertain and the rate of growth in passenger demand could be higher or lower than forecast for a range of reasons, resulting in passenger demand reaching forecast levels earlier or later. The key assumptions explained in Chapter 4 regarding up-gauging by airlines and higher load factors suggest this is a central forecast rather than a	WSCC	N/A	Changes to the assessment were made subsequent to published material for the Autumn 2021 consultation, to which this comment refers. Information relating to the forecast scenarios for airport growth are included in the Forecast Data Book within the DCO Application and reflected in the Transport Assessment and transport modelling.	ES Appendix 4.3.1: Forecast Data Book [APP-075] Transport Assessment [APP-258 to APP-263]	

		worst-case scenario. GAL should provide an alternative 'high demand' forecast scenario to ensure the impacts of the project are understood in a worst-case scenario.				
5.159	Transport Modelling	Appendix 12.9.1, Part 1, 6.2.7 - The reporting (Appendix 12.9.1, paragraph 6.2.7) states that "the transport modelling assumes that the distribution of new employment will be comparable to existing employment". COVID-19 has potentially changed where people work/live, which may also influence their travel behaviour, so further evidence should be provided around this assumption and potentially sensitivity assessments should be undertaken to assess a different distribution and travel pattern of employees.	WSCC	N/A	Whilst there have been changes in the number of days some people commute to work, there is no evidence that people are commuting from different places as a result of Covid. In addition, given the nature of many of the roles at the airport, they are less suitable to be done remotely. The data from the survey of GAL staff from 2019 therefore remains the best estimate of commuting patterns.	N/A
5.160	Staff sustainable transport mode	Appendix 12.9.1, Part 1, 7.2.2 - The reporting (Appendix 12.9.1, paragraph 7.2.2) has a headline target of "60% of staff journeys to travel by sustainable modes...by 2030", which looks to contradict the modelling results that show "employee mode share by sustainable modes of 36% by 2047". Additional measures should be added to ensure the mode share target is achievable and evidence provided to substantiate the target.	WSCC	N/A	The reference to the mode share target is from the PEIR and is now superseded. The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment sets out the interventions which have been tested in the model to demonstrate the mode shares are achievable.	ES Appendix 5.4.1: Surface Access Commitments [APP-090] Chapter 7 of Transport Assessment [APP-258]
5.161	Low emission travel initiatives	12.9.1, Part 1, 7.2.2 - Combining the target for staff sustainable transport mode share with low emission travel initiatives (i.e. zero emission vehicles) will not help to address congestion and also has the potential to abstract investment from initiatives that support sustainable modes of transport (i.e. bus, rail walking and cycling). The target for low emission initiatives should be separated from the target for sustainable modes of transport.	WSCC	N/A	Definitions are provided in paragraph 4.2.2 of the Surface Access Commitments document. Low / zero emission vehicles are not included in the definitions associated with the mode share commitments.	Paragraph 4.2.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]
5.162	The Croydon Area Remodelling	Appendix 12.9.1, Part 1, 7.4.1 - The Croydon Area Remodelling Scheme and Lower Thames Crossing are not fully	WSCC	N/A	The reference is to the information at the time of the PEIR. The approach has been updated in the assessment for the DCO Application.	Chapter 9 of the Transport Assessment [APP-258]

	Scheme and Lower Thames Crossing	funded or going through the relevant statutory planning process and should only be considered 'reasonably foreseeable' at this stage. As such, and in line with DfT's TAG, they should be removed from the core assessment to understand the impacts of the project without these interventions.			The Croydon Area Remodelling Scheme is not included in any of the modelling scenarios. Lower Thames Crossing is currently at the examination stage and is included in the future baseline and with Project scenarios.	Table 57 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.163	Traffic Modelling	Appendix 12.9.1, Part 1, 7.6.8 - The reporting (Appendix 12.9.1, Part 1, paragraph 7.6.8) states that "Modelling shows an employee mode share by sustainable modes of 36% by 2047 and up to 43% including car share, comprising 15% rail, 17% bus and coach and 4% active travel". It is unclear whether these mode shares are an input to the model or as an output. Further details on how these numbers are arrived at is required.	WSCC	N/A	The reference to the mode share target is from the PEIR and is now superseded. The Surface Access Commitments document sets out the committed mode shares.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.164	TAG Data Book	Appendix 12.9.1, Part 4, 4.9.3 - The generalised costs used in the model were taken from TAG Data Book (July 2020 v1.14 -sensitivity test). The updated transport modelling for the DCO should use the latest available information (currently July 2021).	WSCC	N/A	This comment refers to the information at the time of the PEIR. The databook used for the modelling for the Application was v1.17 (released November 2021) which was the latest available information at the time the modelling was undertaken. Annex B (Strategic Transport Modelling Report) of the Transport Assessment provides more information about the inputs to the modelling process (Chapters 3 and 6).	Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] - Chapters 3 and 6	
5.165	TEMPRO 7.2	Appendix 12.9.1, Part 4, 7.2.2 - TEMPRO 7.2 has been used to produce traffic forecasts but the DfT is due to issue an updated version in late 2021/early 2022. How will this be taken into account as part of the DCO?	WSCC	N/A	The transport modelling used the TEMPRO version (7.2) which was available at the time the modelling was undertaken. Temprom 8 was released in August 2022 after the transport modelling for the Application was completed.	N/A	
5.166	Emergent Development Sites	Appendix 12.9.1, Part 4, 7.2.2 - The assessment does not take into account the site-specific impacts of emerging development sites in the area. There are large strategic development sites, such as West of Ifield, Gatwick Green and Horley Business Park, close to Gatwick that are emerging through the respective local	WSCC	N/A	This comment relates to the information at the time of the PEIR. The information provided with the Application includes information covering cumulative development scenarios. Chapter 9.4 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment details the uncertainty	Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] - Chapter 9 / 14 ES Chapter 12 Traffic	

		plans. Due to their proximity to Gatwick, these sites will have a cumulative impact on some of the same parts of the network. The cumulative impact assessment should take these sites into account. It is anticipated that the assessment will demonstrate the need to complete the Crawley Western Link Road (CWLR) to provide a through route, including bus priority, between A264 and A23 due to the cumulative impacts of the West of Ifield development and growth at Gatwick. It is also anticipated that further sustainable transport interventions will be needed to provide connectivity between Gatwick and these strategic sites, and to support the achievement of GAL's mode share targets.			log assumptions relating to these three future development sites. As outlined in paragraph 9.4.9 the eastern side of Crawley Western Link Road, and realignment of existing Rusper Road, is included as part of the modelling undertaken. Chapter 14 of Annex B of the Transport Assessment includes full details of the results of the model scenarios which include these three development sites. Section 12.11 of ES Chapter 12: Traffic and Transport also sets out the consideration of cumulative effects with the inclusion of these three future development sites	and Transport [APP-037]. ES Chapter 20 Cumulative Effects and Inter-relationships [APP-045]	
5.167	Strategic Model	Appendix 12.9.1, Part 4: General comment - More detailed technical notes on inputs to the strategic model should be provided, specifically on building the base model and demand matrices, forecasting & mode choice assumptions.	WSCC	N/A	This comment relates to the information at the time of the PEIR. The Transport Assessment submitted with the DCO Application includes a detailed Strategic Transport Modelling Report at Annex B which provides further technical background.	Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.168	Transport Assessment	Appendix 12.9.1, Part 4: General comment - Following the officer review of the PEIR, GAL published additional information on the transport assessment (Appendix 12.9.1 Preliminary Transport Assessment Report (PTAR) Part 4 Appendix A: Uncertainty Log). Therefore, additional comments may need to be made (post-consultation) once officers have had the opportunity to review the additional information.	WSCC	N/A	This comment relates to the information at the time of the PEIR. The Transport Assessment submitted with the DCO Application includes a detailed Strategic Transport Modelling Report at Annex B which provides further technical background.	Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
5.169	Strategic Model	Appendix 12.9.1, Part 5, 14.1.3 - The reporting states that "In terms of employees, the strategic model shows that a sustainable transport mode share of 47% is achievable and this would indicate that further measures are required, in particular these could include incentives around EV uptake as well as restrictions on staff parking". This	WSCC	N/A	The reference to the mode share target is from the PEIR and the mode share commitments have since been updated. The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment which sets out the interventions which have been	Transport Assessment [APP-258] Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] ES Appendix 5.4.1:	

		statement appears to be contradicted by Appendix 12.9.1, Part 1, paragraph 7.6.8, which states that modelling shows an employee sustainable transport mode share of 36% by 2047 and up to 43% including car share.			tested in the model to demonstrate the mode shares are achievable.	Surface Access Commitments [APP-090]	
5.170	Traffic Flow	Appendix 12.9.1, Part 4, 10.2 Traffic flow change diagrams included in Appendix 12.9.1, Part 4 show differences between 2016 and 2029 and then between 2029 and 2032 and then between 2032 and 2047. There is no comparison of traffic change between 2016 and 2047 therefore the impact on the local road network is difficult to gauge and the true impacts may well be masked. Additional comparisons should be provided to show the differences between 2016 and 2032 and 2016 and 2047.	WSCC	N/A	<p>This comment relates to the information at the time of the PEIR.</p> <p>This information has not been provided in the reports which accompany the DCO Application because the effects of the Project are assessed in a given year against the future baseline in that same year. The information contained in the Application documents can be used to identify traffic flows in each year to allow comparison across years.</p>	Transport Assessment [APP-258] Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]	
5.171	Annual Average Daily Traffic	Appendix 12.9.1, Part 4, 10.3 - The Annual Average Daily Traffic (AADT) flows diagrams are for the forecast years only, with no comparison against earlier year e.g. 2016. Comparisons should be provided to show the differences between 2016 & 2029, 2016 & 2032 and 2016 & 2047	WSCC	N/A	<p>This comment relates to the information at the time of the PEIR.</p> <p>This information has not been provided in the reports which accompany the DCO Application because the effects of the Project are assessed in a given year against the future baseline in that same year. AADT changes from one assessment year to the next for the future baseline can be found in section 11.8 and in Figures 80 - 83 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. Similar information for the With Project scenarios can be found in Section 12.8 and Figures 152 to 155 of Annex B of the Transport Assessment.</p>	Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]	
5.172	Journey time impacts	Appendix 12.9.1, Part 4, 10.4, 10.5, 10.6 - Journey time impacts (Appendix 12.9.1, Part 4, Section 10.4) have been shown for the 2029, 2032 and 2047 forecast years as a comparison between the 'future baseline' and the 'with project' so there looks to be no notable impact. There is no comparison of journey time between 2016 and 2029, 2016 and 2032 and 2016 and 2047 so true impacts may	WSCC	N/A	<p>This comment relates to the information at the time of the PEIR.</p> <p>The information provided in the Application documents now provides journey times for each year including 2016. For the future baseline, journey times on the SRN and on routes in Performance Areas A-D are provided in Section 11.9 of Annex B (Strategic Transport Modelling Report) of the Transport</p>	Transport Assessment [APP-258] Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]	

		well be masked. Comparisons should be provided to show the differences between 2016 & 2029, 2016 & 2032 and 2016 & 2047.			Assessment) and Figures 84, 90, 100, 110 and 120 respectively. For the Project scenarios, equivalent information is provided in Section 12.8 of Annex B of the Transport Assessment and in Figures 156,161,170, 178 and 187. The Project information is also summarised in Diagrams 12.5.2 to 12.5.6 of Section 12.5 of the Transport Assessment		
5.173	Journey times the Volume/Capacity (V/C) ratio	Appendix 12.9.1, Part 5, 10.7 - As with the journey times the Volume/Capacity (V/C) ratio is shown for the forecast years only with no comparison between 2016 and 2029, 2016 and 2032 and 2016 and 2047 so true impacts may be masked for both road link impacts and junction impacts. Comparisons should be provided to show the between 2016 & 2029, 2016 & 2032 and 2016 & 2047.	WSCC	N/A	<p>This comment relates to the information at the time of the PEIR.</p> <p>This information has not been provided in the reports which accompany the Application because the effects of the Project are assessed in a given year against the future baseline in that same year. Section 11.9 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment sets out future baseline V/Cs for the SRN and Performance Areas A to D and section 12.8 provides equivalent information for the with Project scenarios. Section 12.8 of Annex B of the Transport Assessment also provides information on the magnitude of impact assessment, which considers changes in V/C ratios at junctions as a result of the Project.</p>	Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]	
5.174	HGVs and LGVs	Appendix 12.9.1, Part 5, 12.2.10 - The reporting (Appendix 12.9.1, Part 5, Paragraph 12.2.10) states that "For HGVs and LGVs, the shift patterns in August 2027 mean that, for the busiest daytime shift, the monthly total construction vehicles are 14,508 vehicles, equivalent to 7,254 in one direction. When divided by 22 working days and spread over a 10-hour shift, the estimated vehicle trip generation" is 33 Light Goods Vehicles (LGV) and Heavy Goods Vehicles (HGV) in and out an hour along the M23 Spur. The robustness is questioned, as there may be nothing to stop more construction trips arriving or departing in an hour period.	WSCC	N/A	<p>This comment refers to the information at the time of the PEIR and material which has since been updated for the Application. Chapter 15 of the Transport Assessment provides information about construction impacts relevant top surface access.</p> <p>The Outline Construction Traffic Management Plan and Outline Construction Workforce Travel Plan set out proposals for the management of construction vehicle and work movements and activities.</p>	<p>Chapter 15 of the Transport Assessment [APP-258]</p> <p>ES - Appendix 5.3.2 Code of Construction Practice Annex 2: Outline Construction Workforce Travel Plan [APP-086]</p> <p>ES - Appendix 5.3.2 Code of Construction Practice Annex 3: Outline Construction Traffic Management Plan [APP-086]</p>	
5.175	Design Standards	2.2.8 - It is not clear what design standards have been applied and whether	WSCC	N/A	The major local authority roads have been designed in accordance with NH's design	N/A	

		<p>the proposals comply with those standards. WSCC is concerned that the proposals cannot be delivered without departures from standards, which may not be acceptable from a highway safety perspective. GAL should provide a design audit that explains which standards have been applied, compliance with those standards, and identifies the need for any mitigation or departures from standards (which would need to be approved by the relevant highway authority).</p>			<p>standards and guidance documents, including the Design Manual for Roads and Bridges (DMRB) and for more urban and residential roads the Manual for Streets (including Manual for Streets 2) has been adopted. Due consideration has also been given to the guidance contained in Local Transport Note (LTN) 1/20 'Cycle Infrastructure Design' in the development of walking and cycling infrastructure design proposals. Further details on design standards applied and departures from standard identified at this design stage are set out in the highways strategy technical documents shared with the highway authorities as part of design technical engagement.</p> <p>Where the proposed design has not met the required level of provision as detailed in the design standards, these locations have been the subject to further engagement and where required Departures from Standard Applications have been submitted which are subject to ongoing discussion with relevant highway authorities.</p> <p>The scheme has also been subject to a Stage 1 Road Safety Audit, which is subject to ongoing discussion with the relevant highway authorities</p>		
5.156	Speed Limits	<p>2.2.9 - Although the proposals do not mention changes to speed limits, the assessment of environmental impacts (as shown in Table 3.1.8) appears to assume that the speed limit on A23 London Road would be reduced from 50mph to 40mph. Why has GAL not disclosed the full details of the proposed highway changes that have been used to inform the environmental assessment as part of the further consultation? When will these proposals be presented for consultation with stakeholders?</p>	WSCC	N/A	<p>A reduced 40mph speed limit is proposed for A23 London Road between Longbridge Roundabout and the Perimeter Road North/Queensgate signalised junction. The proposed speed limit reduction would be expected to have safety benefits for pedestrians and cyclists on the adjacent active travel routes and proposed signal controlled crossings on A23 London Road. The proposed speed limit reduction would also encourage reduced speeds on the approaches to the proposed A23 London Road signal-controlled junction, at the North Terminal Flyover merge and on the approach to Longbridge roundabout and the associated active travel</p>	<p>Appendix 12.9.1: PTAR Annex C: Scheme Development Report - Highway Mitigation that forms part of Consultation Report Appendices – Part B – Volume 16 [APP-239]</p> <p>Appendix C1 of Consultation Report Appendices – Part C – Volume 1 [APP-243]</p>	

					<p>crossings. With the broader surface access design proposals it is expected that this link would have more of an urban character than the existing situation, contributing to the suitability of this reduced design speed.</p> <p>An assessment of the proposed reduced speed on A23 London Road with respect to West Sussex County Council's Speed Limit Policy has been prepared and this has been shared as an Appendix in the design documents issued to the Local Authority.</p> <p>Additional details on the broader range of highway design proposals have been shared through the transport topic working groups and design engagement meetings and technical documents shared with the local highway authorities in addition to the information shared in the Autumn 2021 consultation materials (Appendix 12.9.1: PTAR Annex C: Scheme Development Report - Highway Mitigation that forms part of Consultation Report Appendices – Part B – Volume 16 (APP-239)) and Summer 2022 consultation materials (Appendix C1 of Consultation Report Appendices – Part C – Volume 1 (APP-243)).</p>		
5.177	Impacts of proposals	2.2.9 - The proposed design changes are noted. However, the performance of the proposals has not yet been demonstrated through use of transport models or other suitable tools. WSCC is concerned about the impacts of the proposals on congestion, journey times between Crawley and Horley (including emergency response times) and redistribution effects across the wider network (including moving traffic from the trunk road network on to local roads). GAL should provide transport modelling evidence to demonstrate that in highway capacity terms, the proposals offer an acceptable solution.	WSCC	N/A	<p>This appears to be referring to previous information. Comprehensive strategic modelling has been completed for the Project, which is documented in Annex B (Strategic Transport Modelling Report) of the Transport Assessment.</p> <p>This includes consideration of journey times through Crawley and Horley. Figures 12 and 13 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment show the journey time routes included in the assessment. The changes to journey times expected as a result of the Project are discussed in Section 12.5 of the Transport Assessment and in sections 11.9 and 12.8 of Annex B of the Transport Assessment.</p>	Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]	

					Changes in traffic flow on links within the model are also identified in section 12.8 of Annex B of the Transport Assessment.		
5.178	Enhance sustainable modes of transport	2.3.1 - The proposals have missed potential opportunities to enhance sustainable modes of transport and appear to be relying solely on bus and coach operators to react to demand, rather than proactively identifying investment in shared travel. WSCC is concerned that the proposed mitigation is too focused on providing for vehicles (including parking provision) and that there is not enough focus on sustainable modes of transport, and that, as a consequence, the sustainable transport mode share targets for passengers and staff would not be achieved.	WSCC	N/A	The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment sets out the interventions which have been tested in the strategic transport model suite to demonstrate the mode shares are achievable.	Chapter 7 of the Transport Assessment [APP-258] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.179	South Terminal Roundabout [2]	2.3.2 - South Terminal Roundabout [2]: A new drainage pond is envisaged as a permanent feature to the north-east of the roundabout. There may be opportunities to enhance biodiversity through the design, creation, and management of this pond.	WSCC	N/A	The proposed pond and basins that form part of the surface access proposals are subject to numerous constraints (e.g. in relation to footprint impacts) as well as a range of design, safety and maintenance considerations that may restrict the ability to provide additional biodiversity enhancements as part of these design elements. The designs will be subject to further development in consultation with the relevant LLFA's and maintaining highway authorities at the detailed design stage.	N/A	
5.180	Land north of the South Terminal Roundabout	2.3.3 - Land north of the South Terminal Roundabout forms part of the Horley Business Park site allocation. It is not clear whether the proposals align with the emerging plans for the business park. GAL should demonstrate that the proposals will not preclude the development from coming forward in line with the statutory development plan for the area.	WSCC	N/A	GAL acknowledges the emerging plans for Horley Business Park and has included it in a cumulative development scenario for the purposes of transport model sensitivity testing. Noting the forthcoming update of the Horley Local Plan and confirmation of its designation and deliverability we do not believe the proposals preclude the development coming forward subject to a successful planning application being made. The land required by GAL is not allocated for built development but is free from development as a landscape buffer in recognition of strategic policies to maintain a "Gatwick Open Setting".	ES Chapter 20 Cumulative Effects and Inter-relationships [APP-045]	
5.181	North Terminal Roundabout (4)	2.3.10 - North Terminal Roundabout (4): There may be opportunities to enhance	WSCC	N/A	The proposed pond and basins that form part of the surface access proposals are subject to	N/A	

		biodiversity through the design, creation, and management of the proposed new drainage pond.			numerous constraints (e.g. in relation to footprint impacts) as well as a range of design, safety and maintenance considerations that may restrict the ability to provide additional biodiversity enhancements as part of these design elements. The designs will be subject to further development in consultation with the relevant LLFA's and maintaining highway authorities at the detailed design stage where this topic will be discussed further.	
5.182	Highway boundary enhancement	2.3.11 - It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, e.g. the creation of wildflower meadows on subsoil/nutrient poor soil.	WSCC	N/A	<p>The Surface Access Landscape Proposals are illustrated in the drawings appended to Environmental Statement Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1.</p> <p>A summary of mitigation and enhancement measures is included in ES Chapter 9 section 9.8 Mitigation and Enhancement Measures Adopted as Part of the Project. This includes Landscape planting to include a variety of native trees and shrubs and wildflower grasslands as identified in the Outline Landscape and Ecology Management Plan - Part 1.</p>	<p>Drawings 1.2.4 to 1.2.15 appended to ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 [APP-113]</p> <p>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation [APP-034]</p>
5.183	Traffic Modelling	2.3.12 - No traffic modelling has been presented for the traffic signals to demonstrate that three right-turning lanes with one left-turn lane are appropriate. GAL is requested to provide evidence that the proposed lane allocations and queuing capacity at the A23 junction would not result in queuing through the North Terminal roundabout; this would be a highway safety issue.	WSCC	N/A	<p>This has been tested as part of the development of the VISSIM modelling. Assessment of detailed network operation is provided in Chapters 5 and 6 of Annex C (VISSIM Forecasting Report) of the Transport Assessment</p>	<p>Transport Assessment Annex C: VISSIM Forecasting Report [APP-261]</p>
5.184	A23 Queens Gate junction	2.3.12 - Although the proposed signing for southbound A23 traffic to North Terminal would be via South Terminal junction (as it is today), satellite navigation systems are more likely to route traffic via the A23 Queens Gate junction, as this is likely to offer a better journey time. It is not clear whether the A23 Queens Gate junction would have sufficient capacity to cater for the volume of traffic that would be likely to	WSCC	N/A	<p>It is currently not possible to turn right from the A23 southbound into Perimeter Road North at the Queens Gate junction and as drawing 41700-XX-B-LLO-GA-200152 shows (Surface Access Highways Plans - General Arrangements - For Approval) there is no proposal to alter this arrangement as part of the Project. Consequently, signing A23 southbound traffic to North Terminal via the</p>	<p>Surface Access Highways Plans - General Arrangements - For Approval [APP-020]</p>

		use it or the impact that these movements would have on other users of A23 London Road, including buses. GAL is requested to provide evidence that the design includes sufficient capacity for traffic to queue at the A23 Queens Gate junction without queuing into the southbound straight-ahead lane (which would be a highway safety issue), and the impacts on journey times (including buses) between Crawley and Horley.			South Terminal junction (as today) will remain the shortest and quickest route for such traffic.		
5.185	Proposed Noise Barrier between A23 and Riverside Garden Park	2.3.12 - The proposed noise barrier between A23 and Riverside Garden Park would be challenging and expensive for WSCC to maintain. GAL is requested to demonstrate how the proposed structure would be inspected and maintained, ideally without the need for lane closures on a busy section of the road network	WSCC	N/A	<p>The development of design proposals for the A23 London Road, including the noise barrier proposed as part of the early concept design put forward as part of the Autumn 2021 consultation materials between the A23 London Road and Riverside Garden Park, was discussed and developed with Local Authorities as part of regular Transport Topic Working Groups.</p> <p>The proposed noise barrier was removed after the Summer 2022 consultation following further noise assessment which confirmed that a noise barrier was not required at this location.</p>	N/A	
5.186	Cycle/pedestrian links	2.3.13 - This section refers to a cycle/pedestrian link between North Terminal and Longbridge Roundabout and a new pedestrian link between Longbridge and Riverside Garden Park. Why is the second of these links not considered for shared pedestrian/cycle use? The more shared routes the better in terms of connectivity and promotion of sustainable transport. Another thing to consider is the status of the new routes. For cycles to use a PRow, it would need to be a Bridleway, which would also allow equestrian use. Therefore, are these routes going to be PRow or if simply for cycle use, would they be adopted as formal cycle routes?	WSCC	N/A	<p>The proposed ramp connection between A23 London Road and Riverside Garden Park just east of the A23 London Road bridge over the River Mole was amended to a shared-use ramp provision for both pedestrians and cyclists following feedback from project stakeholders on the design proposals put forward in the Summer 2022 consultation materials.</p> <p>As defined in Schedule 4 Part 3 of the Draft Development Consent Order and as illustrated in Sheet 1 of the Rights of Way and Access Plans, the proposed shared-use ramp is to be designated as a cycle track, as defined in Part 1 of the Draft Development Consent Order.</p>	<p>Part 1 and Schedule 4 Part 3 of the Draft Development Consent Order [APP-006]</p> <p>Sheet 1 of the Rights of Way and Access Plans [APP-018]</p>	
5.187	Proposed carriageway	2.3.13 - WSCC is concerned about the deliverability of the proposed carriageway	WSCC	N/A	Further information on scheme buildability including the indicative construction	Appendix D: Method Visual - A23 London	

	widening over the River Mole	widening over the River Mole as the current structure would not be easy to extend and constructing a replacement structure would require significant disruption to traffic. GAL needs to demonstrate that the proposals are technically buildable in this location and the construction impacts are manageable.			methodology was shared in previous discussions with WSCC including Transport Topic Working Group Meeting 4 on 31st January 2023. Section 7.3 of the Buildability Report Part B sets out a summary of the North Terminal Junction Area Advanced Works and Construction Stages and Traffic Management Arrangements as well as details on the indicative construction methodology for the A23 London Road bridge over the River Mole. Indicative method visuals illustrating the construction methodology for the replacement bridge are included in Appendix D of the report. Traffic Management Staging sketches are also included in Appendix A of the Buildability Report Part B. Further information on traffic impacts during the construction stage of the scheme are set out in Section 15 of the Transport Assessment.	Road Bridge over River Mole Stage 1 to 11 in ES Appendix 5.3.1: Buildability Report - Part B - Part 1 [APP-080] Appendix D: Method Visual - A23 London Road Bridge over River Mole Stage 12 to 16 in ES Appendix 5.3.1: Buildability Report - Part B - Part 2 [APP-081] Section 15 of the Transport Assessment [APP-258]	
5.188	Weaving space for traffic joining the A23 westbound	2.3.16 - It needs to be demonstrated that there is adequate weaving space for traffic joining the A23 westbound, that then wants to u-turn and travel eastbound.	WSCC	N/A	Adequate weaving space has been provided as per the details below: The measured weaving length from the tip of the nose on the North Terminal Flyover Merge to the stop line at Longbridge Roundabout is approx. 317m and therefore provides a greater weaving length than the minimum length of approx. 170m set out in DMRB CD 122 Clause 4.1 and Figure 4.6a based on the proposed 70kph design speed.	N/A	
5.189	Speed limits	Speed Limits - London Road (A23) posted speed limit is proposed to be reduced to 40mph. No justification or review against WSCC's Speed Limit Policy has been provided by GAL. WSCC cannot currently agree to such change.	WSCC	N/A	Refer to the response to 5.156	N/A	
5.190	Stage 1 Road Safety Audit	Stage 1 Road Safety Audit - whilst a Stage 1 RSA of the proposed highway works has been undertaken not all the auditors recommendations have been satisfactorily addressed by GAL in the	WSCC	N/A	A draft designers response has been shared with WSCC for further discussions which are to be progressed over the coming weeks.	N/A	

		form of the designers response. This needs to be agreed prior to agreement of the proposed highway works.					
5.191	Sustainable transport infrastructure justification	Justification for sustainable transport infrastructure - suitable justification for some of the proposed sustainable transport infrastructure, to ensure it accords the current relevant guidance, such as LTN 1/20, has not been provided and needs to be by GAL.	WSCC	N/A	The design proposals have been presented in a number of transport topic working group sessions with a number of meetings focussing specifically on the active travel design proposals. Additional technical documents have been shared with WSCC as part of highway authority engagement providing additional design detail. Additional commentary on active travel provisions and relevant GAL commitments are set out in response to items 5.97, 5.99 and 5.100 above including commentary on consideration given to LTN 1/20 guidance.	N/A	
5.192	Article 2 Interpretation page 6 DCO	Article 2 Interpretation page 6 DCO – a lot is being excluded from the definition of commencement. Main concerns from a transport perspective being (k) receipt and erection of construction plant and equipment, (l) erection of temporary buildings (n) establishment of construction compounds and (o) establishment of temporary haul roads. There is the potential for a lot of activity which, I assume, would sit outside of the CEMP which would be provided prior to commencement. Seek further clarification on how GAL have assessed these aspects and for their precommencement plan.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	ES Chapter 5: Project Description [APP-030] Draft Development Consent Order [APP-006]	
5.193	Limits of deviation	Article 6 Limits of deviation page 10 – dimensions in terms of metres needs to be included within the relevant sections. GAL need to advise.	WSCC	N/A	Dimensions (in metres) have been added with respect to the vertical limits of deviation for the proposed surface access highway works. The lateral limits of deviation are illustrated by the limits shown on the Works Plans (APP-017). The lateral limits vary in terms of offsets from the proposed works. As such the graphic illustration of the limits is considered to be the most appropriate method to define the limits.	Works Plan [APP-017]	
5.194	Street Works	Article 11 Street Works page 13 – the current wording gives relatively far reaching powers. This appears to depart from approaches taken elsewhere, which	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	

		have specified streets within a schedule rather than just all streets within the order limits. Streets should be specified within a schedule and the changes to the wording of article 11(1) to include wording such as subject to consent of the street authority.				
5.195	Power to alter, layout of streets	Article 12 Power to alter, layout of streets page 13 – GAL are seeking powers outside the order limits. As per comment above (51) clarification should be provided as to why and what streets.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.196	Stopping up of streets	Article 13 Stopping up of streets – there needs to be wording included to require WSCC's agreement of the temporary alternative route under article 13 (2)(b).	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.197	Temporary Closure of Streets	Article 14 Temporary Closure of Streets – need for additional wording in this article in relation to para (5) and (6) to require no street closure until a new temporary street or an alternative temporary route is open. In relation to para (9) WSCC object to the deeming provision within 28 days. Whilst WSCC do not agree with the 28 deeming consent if one is included in the DCO suggested wording should be included requiring the undertaker to inform the authority of the deeming provision when submitted.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.198	Access to works	Article 16 Access to works – As above, WSCC object to the deeming provision and consider it is necessary to seek our consent and, if needs be, we could have a clause setting out that we would not unreasonably withhold our consent.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.199	Classification of roads, etc	Art.17 Classification of roads, etc. - cross reference to the corresponding Schedule is blank, however it is Schedule 7. As per no 66 of this list items needs to be considered and agreed.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.200	Traffic Regulation	Article 18 Traffic Regulation – as above items to be agreed and WSCC object to the 28 day deeming provision.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A
5.201	Agreements with highway authorities	Article 19 Agreements with highway authorities - WSCC would encourage	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this	N/A

		GAL to agree to a template agreement for all highway works under Section 38 and 278 of the Highways Act 1980			tracker. Please refer to that table for such responses		
5.202	Authority to survey and investigate land	Article 22 Authority to survey and investigate land – deemed consent issue comments as above	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	
5.203	Schedule 1	Schedule 1 – the highway works set out in schedule 1 (pages 45-47) are clearly to be agreed and there is a need for additional work to address all matters and comments already provided by the Highway Authority.	WSCC	N/A	Noted and agreed that discussions and technical agreements will need to continue to be progressed over the coming months.	N/A	
5.204	Schedule 2 Requirement 4 Time Limit	Schedule 2 Requirement 4 Time Limit – 10 years from order coming into force and commence is considered a long time. Situation and context could change significantly from what is assessed. WSCC would look for a shorter time frame.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	
5.205	Schedule 2 Requirement 6 Highway Works	Schedule 2 Requirement 6 Highway Works – this requires approval in writing from National Highways. It is not clear why approval is only being sought from National Highways, should it be LPA in consultation with Highway Authorities as necessary	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	
5.206	Schedule 2 Requirement 8 CEMP	Schedule 2 Requirement 8 CEMP – no details provided, the Highway Authority will comment as details are worked up by GAL.	WSCC	N/A	Additional information in relation to the activities and mitigation measures which will take place during the pre-commencement and construction period of the Project available at this project stage is set out in ES Appendix 5.3.2: Code of Construction Practice (APP-082), including Section 3 generally, section 4.4 Enabling Activities and section 5 Management of Environmental Effects.	ES Appendix 5.3.2: Code of Construction Practice [APP-082]	
5.207	Schedule 2 Requirement 11 Traffic Management	Schedule 2 Requirement 11 Traffic Management – should requirement 11 be discharged by the relevant planning authority. Should this read, “approved in writing by the relevant planning authority, following consultation with relevant highway authority on matters related to its function.”	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	

5.208	Schedule 2 Requirement 12 Construction Traffic Workers	Schedule 2 Requirement 12 Construction Traffic Workers – as above, should this be approved by the relevant LPA in consultation with the relevant Highway Authority.	WSCC	N/A	GAL has provided responses to matters raised on the draft DCO under Table 20 of this tracker. Please refer to that table for such responses	N/A	
5.209	Schedule 4 Streets to be permanently stopped up	Schedule 4 Streets to be permanently stopped up – each proposed stopping up needs to be considered and agreed.	WSCC	N/A	Noted and agreed that discussions and technical agreements will need to continue to be progressed over the coming months as part of Statement of Common Ground discussions.	N/A	
5.210	Schedule 7 New and realigned classified trunk roads	Schedule 7 New and realigned classified trunk roads – as per schedule 4 each item needs to be considered and agreed.	WSCC	N/A	Noted and agreed that discussions and technical agreements will need to continue to be progressed over the coming months as part of Statement of Common Ground discussions.	N/A	
5.211	Schedule 8 Traffic Regulation	Schedule 8 Traffic Regulation – need for these to be considered and agreed. As per WSCC's earlier comments GAL need to provide sufficient justification to support the proposed speed limit changes. For example earlier comments have requested further justification from GAL in relation to the proposed speed limit on London Road to 40mph which has not been received.	WSCC	N/A	<p>A reduced 40mph speed limit is proposed for A23 London Road between Longbridge Roundabout and the Perimeter Road North/Queensgate signalised junction. This would encourage reduced speeds on the approaches to the proposed A23 London Road signal-controlled junction as well as at the North Terminal Flyover merge. With the broader surface access design proposals it is expected that this link would have more of an urban character than the existing situation, contributing to the suitability of this reduced design speed. The proposed speed limit reduction would also be expected to have safety benefits for pedestrians and cyclists on the adjacent active travel routes and signal controlled crossings on A23 London Road.</p> <p>An assessment of the proposed reduced speed on A23 London Road with respect to West Sussex County Council's Speed Limit Policy has been prepared and this was shared as an Appendix in the design documents issued to the Local Authority.</p>	N/A	
5.212	Mitigation	Reference T.05.02 relates to Mitigation (entitled Mitigation and Enhancement Measures Adopted as Part of the Project), this is earlier in the list of matters than the assessment of the effects. Would it not be more logical to set out all the assessments matters and then all the mitigation matters? Reference T.05.02	WSCC	N/A	Noted. Discussions on the structure of individual Statements of Common Ground will progress over the coming months as part of the relevant discussions, and informed by this Issues Tracker.	N/A	

		<p>could therefore be moved to come after reference T.09.01 and before all the other mitigation.</p> <p>No section on agreeing the wording of requirements and the Draft DCO. Each matter covering mitigation is quite specific i.e. Surface Access Commitments, Travel Plan, Construction Traffic Management Plan. Given there may be transport related requirements outside of these do we need a specific matter on the agreement of the draft DCO and the wording of requirements?</p> <p>Inclusion of other topics should include, highway traffic modelling approach including software, assessment years, time-periods, scenarios, calibration and validation approach, extent of the strategic highway model network for assessment, baseline traffic survey data, trip generation, distribution and mode share assumptions, Micro-simulation (VISSIM) traffic model of Gatwick Spur, highway mitigation design matters including design review against standards including any departures from standard, Road Safety Audit, proposed Traffic Regulation Orders</p>				
5.213	East Croydon and Windmill Junction	Tracker does not seem to have picked up or addressed Tandridge's point on whether upgrades to East Croydon and Windmill Junction would support any train service viability for passenger increase.	TDC	N/A	<p>Crowding on rail services has been assessed. Chapter 9 of the Transport Assessment describes the assessment and a full set of rail data is included in ES Appendix 12.9.2. The assessment concluded that no significant increase in crowding on rail services is expected as a result of the Project and therefore no mitigation is required. The Project does not therefore require the upgrades to the rail network referred to in the comment, nor are they included in either the baseline or with Project scenarios in the assessment.</p>	<p>Chapter 9 of the Transport Assessment [APP-258]</p> <p>ES Appendix 12.9.2: Rail Passenger Flows [APP-154]</p>
5.214	Junction 6, J7 and J8 of the M25	Tracker does not appear to have picked up or addressed that Tandridge raised issues on capacity at Junction 6 of the M25, as well as J7 and J8.	TDC	N/A	<p>A magnitude of impact assessment was undertaken across the modelled area to understand the impact of the Project on junctions within the model. Performance Area</p>	<p>Chapter 12 of Transport Assessment [APP-258]</p>

					<p>B and C cover these junctions which are also part of the SRN. The future baseline highway performance is set out in Sections 11.8 and 11.9 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment; the with Project highway performance is described in in Section 12.8 of Annex B and summarised in Section 12.5 of the Transport Assessment. Section 11.9 provides some commentary on V/C ratios on links near J6 and on the clockwise offslip at M25 J8. Section 11.9 also indicates locations in Performance area B at M25 J6 for further consideration, identified by comparing the 2032 and 2038 future baseline outputs as part of the magnitude of impact assessment. Nodes experiencing 'high' and 'medium' impacts are considered further in Annex E (Highway Junction Review) of the Transport Assessment, which provides more detail on performance at M23 Junction 8 / M25 Junction 7.</p>	<p>Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] - Sections 11.8, 11.9 and 12.8</p> <p>Transport Assessment Annex E: Highway Junction Review [APP-263]</p>	
5.215	Felbridge junction of the A22	Tracker does not appear to have picked up or addressed Tandridge comments on concerns about the impacts of increased traffic on the Felbridge junction of the A22.	TDC	N/A	<p>A magnitude of impact assessment was undertaken across the modelled area to understand the impact of the Project on junctions and links within the mode. This junction is within Performance Area B - section 12.8 and Figures 175 to 177 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment show that this junction is not flagged in the Magnitude of Impact assessment, indicating that the Project would not have a significant impact at this location.</p>	<p>Chapter 12 of Transport Assessment [APP-258]</p> <p>Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] - Section 12.8</p>	
5.216	Off-airport parking	Tracker does not appear to have picked up or addressed issues raised on off-airport parking and how these increase pressure on the LRN, which do not seem to have been listed.	TDC	N/A	<p>The proposals for additional parking are provided in ES Chapter 5: Project Description. Proposals for parking capacity both replace capacity lost during construction and provide for a small nett increase for growth, taking account of the estimated sustainable mode shares contained in the Surface Access Commitments. The Surface Access Commitments include provision for monitoring noting there is already annual monitoring of parking capacity through the current S106 agreement.</p>	<p>Chapter 7 of the Transport Assessment [APP-258]</p>	

					<p>The policy towards authorised off-airport parking, and the enforcement of unauthorised off-airport parking are matters for local authorities. GAL supports the current policies of local authorities that any increase in airport-related parking should take place on-airport as the most sustainable location but that this provision should be consistent with GAL's approach to promoting an increase in the use of sustainable modes. The Surface Access Commitments document submitted with the DCO sets out our proposal to support local authorities with the management and enforcement of off-airport parking and traffic issues.</p>		
5.217	Reconstruction of Balcombe Road bridge	Re. reconstruction of Balcombe Road bridge - there is no mention of closing Balcome Road on the TM info. An overbridge replacement will most likely close the road under to pedestrian for a period/temporary tunnel underneath to protect pedestrians.	SCC	N/A	<p>A description of the preliminary construction methodology and anticipated road closures required for the replacement bridge over Balcombe Road and the new slip road bridges is described in Sections 7.4.46 to 7.4.54 of the Environmental Statement Appendix 5.3.1: Buildability Report - Part B - Part 1 (APP-080)</p> <p>Alternative routes under M23 Spur/Airport Way for pedestrians during the temporary closure of Balcombe Road include The FP360 route under Airport Way Rail Bridge to the west and Peeks Brook Lane under M23 Spur to the east.</p> <p>Section 4.4 of the Environmental Statement - Appendix 19.8.1 PROW Management Strategy (APP-215) covers the proposed PROW management of temporary PROW diversions in the vicinity of the Balcombe Road and M23 Spur works and details proposed diversions routes for use during footpath closures due to construction.</p>	<p>ES Appendix 5.3.1: Buildability Report - Part B - Part 1 [APP-080] Section 4.4 of the ES Appendix 19.8.1 PROW Management Strategy [APP-215]</p>	
5.218	A23 Longbridge reconstruction	A23 Longbridge reconstruction - appears that south side utility bridge won't be used for pedestrians. Should be considered further as the alternative route would be to use the north footway and then go anticlockwise around the whole	SCC	N/A	<p>As shared in the Transport Topic Working Group Meeting 4 on 31st January 2023, the proposed indicative construction methodology for the A23 London Road bridge over the River Mole is for a pedestrian bridge to be provided on the northern side of the bridge only.</p>	N/A	

		roundabout. A widened utility bridge for pedestrians etc. would need to be considered in the scheme boundary extent. A controlled pedestrian crossing may need to be considered north/east of the Longbridge Roundabout if users are expected to use the north footway.			Crossing provision on A23 Brighton Road will be included as part of the temporary traffic management measures at this location with onward connectivity to be provided to/from A217 and Povey Cross Road. The existing footway on the eastern side of A23 London Road provides access to/from Riverside Garden Park only. The most direct route for users seeking to access Riverside Garden Park from A23 Brighton Road would be via Woodroyd Avenue and residential road connections to Crescent Way which provides connectivity to/from the main park access point.		
5.219	A23 Longbridge reconstruction	A23 Longbridge reconstruction sequence shows the north utility bridge will be used for pedestrians etc. This appears a fairly long temporary bridge and pedestrian route and it will need to be fairly wide. Again the width will need to be determined now to inform the scheme boundary (this may be less of an issue on this side as the scheme boundary will be wide to include the attenuation ponds in the adjoining field).	SCC	N/A	As set out in response to item 5.218 above, the proposed indicative construction methodology for the A23 London Road bridge over the River Mole is for a pedestrian bridge to be provided on the northern side of the bridge only. This is considered to be sufficient with due consideration to factors such as minimising the impacts on adjacent land parcels and existing vegetation etc. Adequate space is available within the Order limits at this location to accommodate a pedestrian bridge of sufficient width for the purposes of the temporary diversion.	N/A	
5.220	Longbridge roundabout	Longbridge roundabout is a busy HGV route with large/abnormal loads so would like to understand widths proposed and alternative provision for diverted large vehicles if they can't use the M23	SCC	N/A	As described in the Environmental Statement Chapter 5 Project Description, Section 5.2.019 to 5.2.115, it is proposed to provide increased lane widths on the circulatory carriageway at Longbridge Roundabout to better accommodate vehicle turning movements. The current lanes create a capacity restriction due to goods vehicles needing to straddle two lanes for certain manoeuvres. The proposed new roundabout would have a slightly larger diameter and would extend further west and north to accommodate the wider circulating lanes. The Longbridge Roundabout layout is shown in the ES Appendix 5.2.1: Surface Access General Arrangement Plans. In the event that for some reason large vehicles could not use the M23, it is	ES Chapter 5 Project Description , Section 5.2.019 to 5.2.115 [APP-030] ES Appendix 5.2.1: Surface Access General Arrangement Plans [APP-076]	

					anticipated that similar rerouting to the existing layout/situation would occur and/or this would be managed by the emergency services, if on site, following the existing approach.		
5.221	ROW	Longbridge roundabout towards north terminal - south west section is not currently public open space. Is the intention to dedicate as public right of way?	SCC	N/A	This is defined as a new/improved footway or cycle track within the Rights of Way and Access Plan and is not dedicated as a PROW. Draft DCO Schedule 4 Part 3 details the highway designation of this route as a cycle track.	Rights of Way and Access Plan [APP-018] Draft DCO, Schedule 4 Part 3 [APP-008]	
5.222	ROW	South terminal, NCR 21 and car park B - new pedestrian link. Plan to dedicate as public right of way?	SCC	N/A	<p>As illustrated in sheet 2 of the Rights of Way and Access Plans and as defined in Draft DCO Schedule 4 Part 3, the new pedestrian link between the existing Balcombe Road footway and the existing South Terminal Ring Road South footway, labelled as c1, is to be designated as a footway.</p> <p>The existing designation of NCR 21 is to remain unchanged.</p> <p>The new pedestrian paths in the proposed replacement Public Open Space in Car Park B are not proposed to form PROW, they will be part of the public open space. Footpath 355a just west of the rail line and east of Car Park B is retained as in the existing situation.</p> <p>As illustrated in sheet 1 of the Rights of Way and Access Plans and as defined in Draft DCO Schedule 4 Part 3, the new pedestrian link between Car Park B and Riverside Garden Park on the northern side of Airport Way within the highway embankment footprint, labelled as c12, is proposed to be a footway. At its western end it ties into the existing pedestrian footway connection between A23 London Road and Riverside Garden Park that falls partially within WSCC highway boundary and partially within National Highways highway boundary.</p>	Rights of Way and Access Plans [APP-018] Draft DCO, Schedule 4 Part 3 [APP-008]	
5.223	ROW	Query re engagement with Sustrans who manage NCR21	SCC	N/A	Neither Active Travel England or Sustrans have provided any comment or engagement to date. GAL is in contact with both organisations to ensure their views can be considered	N/A	

5.224	Active travel	Will there be police input re design, in particular lighting and safety, for active travel routes.	SCC	N/A	<p>Early engagement on design proposals have taken place with the police which did not raise any issues relating to lighting or safety of the Active Travel proposals. As Gatwick NRP progresses through future design stages engagement with the Police and other emergency service will be continued.</p> <p>Lighting of Active Travel routes is provided by the highway standard street lighting and users of the highway network and Gatwick facilities are assumed to provide passive surveillance of the facilities.</p>	N/A	
5.225	Highways	Both Surrey and West Sussex have commenced operation of Lane Rental Schemes under S74a of NRSWA '91. Request for engagement re consideration of Lane Rental schemes as well as Permit scheme within DCO	SCC	N/A	<p>Consideration of the relevant Lane Rental Schemes was given during the development of the indicative construction approach and this was discussed during the Topic Working Groups prior to DCO submission.</p> <p>GAL would envisage that engagement on the details of how the scheme would operate within the lane rental scheme would be discussed as part of the construction phase of the scheme after the DCO has been granted.</p>	N/A	
5.226	Target in terms of passengers travelling by public transport, active travel modes or using a zero or low emission vehicles	The achievability of the 60% target of passengers travelling by public transport, active travel modes or using a zero or low emission vehicles by 2030 to the airport. So far no discussion on limiting flights until 60% target is being met.	RBBC	N/A	The reference is to a mode share target which has been superseded. The Surface Access Commitments document sets out the committed mode shares, monitoring commitments and proposed steps should the committed mode shares not be met.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.227	Car Parking	Construction of new carpark capacity can only progress when the modal shift from private cars to public transport targets is being achieved.	RBBC	N/A	New car park capacity needs to be constructed to accommodate displaced parking during construction.	Chapter 7 of Transport Assessment [APP-258]	
5.228	Longbridge Roundabout	The repositioning of the Longbridge Roundabout and associated vegetation and tree cover removal would harm the outlook of the properties in Longbridge Road & quality of Life - requested extra noise insulation and exploration of CPO for worst affected properties	RBBC	N/A	The Surface Access Landscape Proposals are illustrated in Figures 1.2.1 to 1.2.15 appended to Environmental Statement Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 (oLEMP). The oLEMP also includes concept sketch designs for landscape proposals and replacement open space at Longbridge roundabout. Temporary significant adverse effects on visual amenity are identified for occupiers of one property on	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 [APP-113] ES Chapter 14: Noise and Vibration [APP-039]	

					<p>Longbridge Road. In the longer term, when planting proposals have matured, levels of effects would reduce and the view would return to a character similar to the existing situation.</p> <p>The assessment of road traffic noise confirms that with the mitigation incorporated into the scheme these properties will not be subject to noise impacts and Noise Insulation is not required.</p>	ES Appendix 14.9.4: Road Traffic Noise Modelling [APP-174]	
5.229	Cycling and Pedestrian Network	Introduction of cycle and pedestrian ramp would result in loss of tree and vegetation cover, how would this affect biodiversity and tranquillity? Whilst there is subsequent material in the application details are yet to be agreed.	RBBC	N/A	<p>The Surface Access Landscape Proposals are illustrated in Figures 1.2.3 to 1.2.15 appended to Environmental Statement Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1.</p> <p>Temporary significant adverse effects on visual amenity are identified for occupiers of one property on Longbridge Road. In the longer term, when planting proposals have matured, levels of effects would reduce and the view would return to a character similar to the existing situation.</p>	Drawings 1.2.4 to 1.2.15 appended to ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 [APP-113]	
5.230	Amenities and Noise Barrier	Harm to amenities of properties in Longbridge Road and need for noise barrier.	RBBC	N/A	<p>The Surface Access Landscape Proposals are illustrated in Figures 1.2.3 to 1.2.15 appended to Environmental Statement Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1.</p> <p>Temporary significant adverse effects on visual amenity are identified for occupiers of one property on Longbridge Road. In the longer term, when planting proposals have matured, levels of effects would reduce and the view would return to a character similar to the existing situation.</p> <p>The assessment of road traffic noise confirms that with the mitigation incorporated into the scheme these properties will not be subject to noise impacts and a further noise barrier alongside the park will not be required.</p>	<p>Drawings 1.2.4 to 1.2.15 appended to ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1 [APP-113]</p> <p>Section 14.8 and 14.9 of ES Chapter 14: Noise and Vibration [APP-039].</p> <p>Section 5 of ES Appendix 14.9.4: Road Traffic Noise Modelling [APP-174]</p>	
5.231	Riverside Gardens	Need for a replanting programme in Riverside Gardens after the road	RBBC	N/A	<p>There will be some tree and vegetation loss in the vicinity of Riverside Garden Park during</p>	Environmental Statement, Appendix	

		widening works. So far no discussion from Gatwick with RBBC on the detail.			<p>construction of the A23 London Road and Airport Way works. This has been the subject of discussion with the Local Authorities within the TWGs, with draft plans included in the TWG presentation for the meeting of 9 February 2023.</p> <p>Significant effort has been made to minimise any loss. As part of the DCO Application, ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 1 outlines the surface access landscaping proposals. Refer to drawing sheets 6 to 12 of 12 within this document which illustrate the landscape proposals adjacent to the A23 London Road / Airport Way.</p> <p>Planting types and locations are in accordance with Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13. Safety and operational requirements include removal of vegetation that has colonised and encroached to the road edge to accommodate footway, safety barrier, sight lines to signage and maintenance access. Replacement public open space has been provided at Car Park B and Longbridge Roundabout/Church Meadows and will significantly improve the character and quality of these two locations.</p>	<p>8.8.1 Outline Landscape and Ecology Management Plan Part 1 [APP-113] Drawing sheets 6 - 12, Figures 1.2.2, 1.2.3, 1.2.16 and 1.2.17.</p>	
5.232	Construction programme	Construction programme imaging flattens adjacent buildings - misleading.	RBBC	N/A	<p>The construction method visuals are intended as indicative visual aids to aid in understanding the nature of the proposed construction works with additional features such as the scheme order limits illustrated in the images for context.</p> <p>Details in relation to the proximity of the proposed highway design features to existing assets such as buildings can be found in the scheme General Arrangement Drawings.</p>	<p>Surface Access General Arrangements – For Approval [APP-020]</p>	

5.233	South Terminal Roundabout Works Compound	South Terminal Roundabout Works Compound requested details the location of the concrete batching site, temporary buildings, car park layouts, storage areas, road and footway layouts. Also details of types of materials being stored given proximity to major road and railway line.	RBBC	N/A	The South Terminal Roundabout Compound will be the main temporary construction compound supporting all surface access works, including South Terminal Roundabout and will include logistics areas to store temporary and permanent materials. A description of the facilities provided at the South Terminal Construction Compound is within the Environmental Statement Chapter 5 Project Description, Section 5.3.102 (APP-030). The extents of the compound can be seen Environmental Statement Appendix 5.3.1: Buildability Report - Part A, Figure 11: Site Context Plan - South Terminal Roundabout Contractor Compound (APP-079).	ES Chapter 5: Project Description , Section 5.3.102 [APP-030] ES Appendix 5.3.1: Buildability Report - Part A , Figure 11 [APP-079]	
5.234	South Terminal Roundabout	Development of business park could occur at same time as road works and would require access from South Terminal Roundabout.	RBBC	N/A	<p>The proposals for Horley Business Park, including requirements for access to the site during construction are matters for the promoter of that development. No information has been provided on the specific access requirements envisaged, nor the discussions with National Highways to secure access off South Terminal Roundabout in connection with that development.</p> <p>Noting the forthcoming update of the Local Plan and confirmation of its designation and deliverability we do not believe the proposals for Horley Business Park preclude the development coming forward subject to a successful planning application being made. The land required by GAL is not allocated for built development but is free from development as a landscape buffer in recognition of strategic policies to maintain a "Gatwick Open Setting".</p>	N/A	
5.235	A23 bridge over Balmoral Road	A23 bridge over Balmoral Road widening and culvert realignment would remove very significant number of trees. Important local issue following removal of large number of trees on adjacent site. What form would any mitigation take?	RBBC	N/A	<p>It is assumed that this refers to the M23 bridge over Balcombe Road, the widening required to provide slip roads and the adjacent culvert works.</p> <p>There will be some tree and vegetation loss in the vicinity of the M23 bridge over Balcombe Road during construction. This has been the</p>	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan Part 1 , Figures 1.2.4 to 1.2.15 [APP-113].	

					<p>subject of discussion with the Local Authorities within the TWGs, with draft plans included in the TWG presentation for the meeting of 9 February 2023.</p> <p>Significant effort has been made to minimise any loss. As part of the DCO Application, the ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 1 (APP-113), outlines the surface access landscaping proposals. Refer to Figures 1.2.4 to 1.2.15 within this document which illustrate the landscape proposals adjacent to Balcombe Road. Annex 3 includes Typical schedules of plant species and mixes, including native trees and woodland.</p> <p>Planting types and locations are in accordance with Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13.</p>		
5.236	Longbridge Road garages	Use of Longbridge Road garages route to access work on River Mole Bridges and that these garages will still be in use and the path is used to access bid stores by the Council's waste & recycling vehicles and would still be required.	RBBC	N/A	Access to/from existing garage and waste facilities at this location will be maintained during the construction. Details on access arrangements will be confirmed with relevant stakeholders in advance of the construction after the DCO has been granted.	N/A	
5.237	Retention of footpath	Retention of footpath along A23 beside road as performs important safety function	RBBC	N/A	The proposals for surface access improvements on the A23 London Road retain and improve the existing footway on the northern side of the A23 London Road. The proposals reflect refinements made following consultation responses and engagement with National Highways and local highway authorities regarding junction layouts and active travel routes for pedestrians and cyclists. The Environmental Statement Chapter 5: Project Description, Section 5.2.109 describes the improvements to Longbridge Junction and the A23 London Road, including provision of Active Travel. The Longbridge Roundabout layout is shown in the	<p>ES Chapter 5: Project Description, Section 5.2.109 [APP-030]</p> <p>ES Appendix 5.2.1: Surface Access General Arrangement Plans [APP-076]</p>	

					ES Appendix 5.2.1: Surface Access General Arrangement Plans.		
5.238	Cycle/pedestrian ramp	Suitability of location of cycle/pedestrian ramp linking A23 footpath and Riverside Gardens due to proximity of highways drainage	RBBC	N/A	The proposals for surface access improvements reflect refinements made following consultation responses and engagement with National Highways and local highway authorities regarding junction layouts and active travel routes for pedestrians and cyclists. ES Chapter 5: Project Description, Section 5.2.109 describes the improvements to Longbridge Junction and the A23 London Road, including provision of Active Travel. The Longbridge Roundabout layout is shown in the ES Appendix 5.2.1: Surface Access General Arrangement Plans.	ES Chapter 5: Project Description, Section 5.2.109 [APP-030] ES Appendix 5.2.1: Surface Access General Arrangement Plans [APP-076]	
5.239	Footpath closure	Longevity of footpath closure 360/360sy 27 weeks, NCR21 - 12 weeks and resultant diversions - need to ensure north south footpaths are not all closed at same time in vicinity.	RBBC	N/A	Section 4.4 of the Environmental Statement - Appendix 19.8.1 PROW Management Strategy covers the proposed PROW management of temporary diversions and details proposed diversions routes for use during footpath closures due to construction. Paragraphs 19.9.18 to 19.9.30 of ES Chapter 19 Agricultural Land Use and Recreation explain how north to south connections would be maintained during the construction phase.	Section 4.4 of the ES Appendix 19.8.1: PROW Management Strategy [APP-215] ES Chapter 19: Agricultural Land Use and Recreation [APP-044]	
5.240	Sustainable transport modes	Provision of choice of sustainable transport modes from villages in north Mid Sussex – Crawley Down and Copthorne. In order to provide residents in northern Mid Sussex, a real choice of sustainable transport modes and reduce the reliance on the private car further investment in bus connectivity is required. This is particularly important when relying on these areas for labour supply and taking into account the unsociable hours that many roles within the airport have. Local bus enhancements should be sought on routes in these areas to provide fast and frequent direct service to Gatwick.	MSDC	N/A	GAL has developed Surface Access Commitments (SACs) (PINS Doc Ref: APP-090) which identify the sustainable transport mode share outcomes which GAL is committing to, together with commitments to the interventions and measures that GAL will use to achieve those mode shares. These interventions include measures that will increase public transport choice and encourage the use of public transport and active travel modes, alongside measures aim to reduce levels of private care use amongst air passengers and staff. Further information on the SACs is included in Section 12.8 of Chapter 12 and within the SACs document itself.	Section 5.2 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
5.241	Car Parking Strategy	GAL need to prepare a robust Car Parking Strategy that links with the overall Transport and Sustainability strategies.	MSDC	N/A	The policy towards authorised off-airport parking, and the enforcement of unauthorised off-airport parking are matters for local	Section 5.2 [para 5.23.83 onwards) of the ES Chapter 5: Project	

		<p>This is in order for GAL to be able to demonstrate a justified need for the level of parking provided.</p> <p>There is an ongoing pressure for off site airport parking by other airport parking operators. What is the evidence that providing more on site parking will reduce this pressure.</p>			<p>authorities. GAL supports the current policies of local authorities that any increase in airport-related parking should take place on-airport as the most sustainable location but that this provision should be consistent with GAL's approach to promoting an increase in the use of sustainable modes.</p> <p>The Surface Access Commitments document submitted with the DCO sets out our proposal to support local authorities with the management and enforcement of off-airport parking and traffic issues.</p>	<p>Description [APP-030]</p> <p>Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport [APP-037].</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090].</p>	
5.242	Bus strategy	<p>Bus Strategy – lack of improvement to services in rural areas of Mid Sussex, acting as barrier to mode shift. Where rail links do exist at Haywards Heath and Burgess Hill, connections to neighbouring settlements is poor acting as a barrier to use. The current strategy therefore risks leaving large parts of the district which is geographically very close to the airport, with no realistic alternative to car travel. Mid Sussex council would therefore like to understand the potential impacts of introducing bus priority measures and/or an extension to the Fastway service along the A264 corridor and would strongly encourage undertaking feasibility and modelling work to quantify what impact these interventions could make to support mode shift to sustainable travel, as currently presented the strategy overall appears to not be sufficient to achieve the mode share targets.</p>	MSDC	N/A	<p>GAL has developed Surface Access Commitments (SACs) (APP-090) which identify the sustainable transport mode share outcomes to which GAL is committing, together with commitments to the interventions and measures that GAL will use to achieve those mode shares. The assessment presented in Section 7 and other parts of the Transport Assessment indicates that the measures suggested by Mid-Sussex Council are not necessary to achieve the mode share commitments.</p> <p>GAL's existing Sustainable Transport Fund (STF) is already used to create a funding stream for initiatives aimed at increasing the use of sustainable transport modes, in support of the measures contained in the current ASAS. Initiatives that are part or wholly funded through the STF are discussed and agreed with the TFSG. The STF is currently administered under periodic Section 106 commitments, which are regularly reviewed and renewed.</p> <p>GAL will continue to use the STF to support measures that will help to achieve the mode share commitments.</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090].</p> <p>Section 7 of the Transport Assessment [APP-258]</p>	
5.243	Sustainable transport mode share	<p>Concern is raised regarding the target for staff sustainable transport mode share with low emission travel initiatives (i.e. electric vehicles), this will not relieve issues with congestion and could risk</p>	MSDC	N/A	<p>The Surface Access Commitments document sets out the committed mode shares, and Chapter 7 of the Transport Assessment sets out the interventions which have been tested</p>	<p>Chapter 7 of the Transport Assessment [APP-258]</p>	

		investment being directed away from more sustainable modes such as bus, rail, walking and cycling and should therefore be separated from the target for sustainable modes.			in the model to demonstrate the mode shares are achievable. Definitions are provided in paragraph 4.2.2. of the Surface Access Commitments document. Low / zero emission vehicles are not included in the definitions associated with the mode share commitments	ES Appendix 5.4.1 Surface Access Commitments [APP-090]	
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Table 6: Ground

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
6.1	Ground Investigation	The report summaries appear to be made in broad accordance with the relevant British Standards. However further engagement between GAL and RBBC will be needed on the proposed works within the borough boundary.	JLAs	RBBC will be consulted on each step of the ground conditions related works from scoping of initial ground investigation (if required) through to remediation strategy and verification, where necessary. This will be the case for all LPAs.	The ES contains the appropriate information that was not available at PEIR. Requirement 9 of the Draft DCO requires engagement with the relevant planning authority on any further ground investigations in relation to contamination.	Section 10.3 of ES Chapter 10: Geology and Ground Conditions [APP-035].	
6.2	Mineral Resource	Little evidence in the PEIR has been submitted regarding the impact on the geology beneath Museum Field and land stability following the re-profiling of the land to form the flood compensation scheme.	JLAs	A mineral resource assessment (MRA) is to be undertaken as part of the project (planned as part of the ES submission), with opportunities for reuse to be explored. Further ground investigation with slope stability assessment will be completed to inform detailed design.	An MRA has been produced with the approach agreed during a virtual meeting with both Surrey and West Sussex County Council Mineral Planning Authorities dated 10/11/2022.	ES Appendix 10.9.2 Mineral Resource Assessment [APP-139] Table 10.8.1 & Paragraph 10.4.8 of ES Chapter 10: Geology and Ground Conditions [APP-035].	
6.3	Mitigation	The Project site boundary encompasses the widening of the M23 spur eastbound from two to three lanes and this falls in part within the administrative area of Tandridge. Concern is raised regarding this in terms of the potential for run-off from construction areas to soils and subsequent leaching into groundwater. The construction of the surface access works would also introduce additional surface runoff during their operational phase by introducing additional hardstanding.	JLAs	The potential for contaminants to be mobilised during construction as a result of leaching into groundwater is assessed within Chapter 10 of the PEIR. Any impacts during construction and operation will be mitigated through implementation of a remediation strategy and through compliance with the Code of Construction Practice.	Please refer to the ES for details of the assessment. This should be read alongside the Code of Construction Practice which details the control measures to be adhered to. An assessment of impacts on surface water are contained within ES Chapter 11 Water Environment and its various appendices.	Paras 10.9.52 to 10.9.53 & Table 10.8.1 of ES Chapter 10: Geology and Ground Conditions [APP-035]. ES Appendix 5.3.2 Code of Construction Practice [APP-082]. Annex 1 Water Management Plan of ES Appendix 5.3.2 Code of Construction Practice [APP-083]. ES Chapter 11 Water Environment [APP-036].	
6.4	Mineral Resource	The airport is underlain by Weald Clay (as identified). Although there are significant amounts of clay in the county, and sufficient reserves in the existing brickworks, MRA	JLAs	Any potential mineral resources, including the Weald Clay, will be reviewed within the MRA to be undertaken as part of the project, with opportunities for reuse to be explored.	An MRA has been produced with the approach agreed during a virtual meeting with both Surrey and West Sussex County Council Mineral Planning Authorities dated 10/11/2022.	ES Appendix 10.9.2 Mineral Resource Assessment [APP-139].	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		should be undertaken to identify the presence of minerals, in line with guidance, to avoid needlessly sterilising minerals (not just clay). Opportunities should be undertaken to extract any viable minerals prior to development. Materials found may be useable as part of the construction activities.					
6.5	Ground Investigation	It is disappointing that Ground Investigation surveys have not been completed already, and we would encourage that this work be completed at the earliest opportunity	JLAs	The site has been the subject of numerous previous investigations, the results of which are summarised within Chapter 10 and accompanied Appendix (Preliminary Risk Assessment). Further ground investigation will be undertaken where risks cannot be demonstrated to be low and to inform detailed design.	The ES contains the appropriate information that was not available at PEIR. Any further ground investigations required would be undertaken as part of the detailed design process. Requirement 9 of the Draft DCO requires engagement with the relevant planning authority on any further ground investigations in relation to contamination.	Section 10.6 of ES Chapter 10: Geology and Ground Conditions [APP-035]. ES Appendix 10.9.1: Preliminary Risk Assessment [APP-138] Draft DCO [AS-005].	

Table 7: Heritage

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
7.1	Archaeological Assessment	N/A	JLAs	Summary from TWG Discussions: Gatwick will provide the pre-application archaeological assessment report to the Principal Local Authorities having oversight of Heritage Issues. On basis of the assessment, it is anticipated there will be no requirement for post application archaeological assessment at Bayhorne and Gatwick Dairy Farm sites (SCC). There will be a requirement for further archaeological assessment in the eastern part of the Museum Field site (WSCC).	All reports on the results of archaeological investigations undertaken on behalf of the Project were presented to the relevant Local Authorities ahead of the submission of the DCO application. No further archaeological work is proposed at the Bayhorne and Gatwick Dairy Farm sites and this has been agreed with Surrey County Council. Further archaeological work is proposed with regard to the establishment of the flood compensation area in the eastern part of Museum Field.	<p>ES Appendix 7.6.2 Archaeological Evaluation Report: Gatwick Airport [APP-102]</p> <p>ES Appendix 7.6.3 Archaeological Evaluation Report Phase 2: Longbridge Roundabout and Reigate Field [APP-103]</p> <p>ES Appendix 7.8.1: Written Scheme of Investigation for post-consent archaeological investigations – Surrey [APP-105]</p> <p>ES Appendix 7.8.2 Written Scheme of Investigation for post-consent archaeological investigations – West Sussex [APP-106]</p>	
7.2	Archaeological Assessment	N/A	JLAs	Summary from TWG Discussions: Archaeological assessment within the airport boundary will be limited to where Predictive Modelling of Zones of	No areas of high potential for surviving archaeological remains within the airport boundary	ES Figure 7.6.5 Predictive modelling of	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				Archaeological Potential indicates a high potential for surviving archaeological remains (see PEIR Figure 7.6.5).	would be affected by the Project, therefore no further archaeological assessment is proposed.	zones of archaeological potential [APP-054]	
7.3	Archaeological Assessment	N/A	JLAs	Summary from TWG Discussions: Assessment of air noise effects to historic buildings will follow the English Heritage Aviation Noise Metric. Research on the Potential Noise impacts on the Historic Environment by Proposals for Airport Expansion in England (Temple Group and Cotswold Archaeology, 2014; PEIR §7.4.6)	N/A	Section 7.4 and Section 7.9 of ES Chapter 7: Historic Environment [APP-032]	
7.4	Mitigation	Mitigation and enhancement measures should not just be limited to on site assets. Opportunities should be considered where the settings of heritage assets could be improved by physical works within the scheme boundary.	JLAs	Further work on mitigation and enhancement is currently being undertaken as the scheme design progresses.	The overall Project design and the environmental mitigation measures presented within ES Chapter 5: Project Description have been developed with due consideration for opportunities to avoid or reduce impacts on heritage assets.	ES Chapter 5: Project Description [APP-030] Section 7.8 of ES Chapter 7: Historic Environment [APP-032]	
7.5	Air noise on Listed Buildings	A full assessment of the impact of air noise on all listed buildings in the District should be undertaken.	JLAs	The assessment of the impact of air noise change, with regard to designated heritage assets, including listed buildings, has been undertaken in line with the appropriate guidance.	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment, with the methodology set out in ES Appendix 7.6.1: Historic Environment Baseline Report. The application of the guidance has been agreed with Historic England as being appropriate.	ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] Section 7.4 and Section 7.9 of ES Chapter 7: Historic Environment [APP-032]	
7.6	Archaeological Evaluation	Further archaeological evaluation is required - particularly within and around Museum Field but also on Pentagon Field and Crawter's Field	JLAs	A phase of archaeological evaluation was undertaken last summer which included work within Museum Field and Pentagon Field. No part of the scheme is now proposed to be in Crawter's Field. A second phase of evaluation was carried out in May of this year at Bayhome Farm and Gatwick Dairy Farm.	N/A	ES Appendix 7.6.1 Historic Environment Baseline Report [APP-101] ES Appendix 7.6.2 Archaeological Evaluation Report: Gatwick Airport [APP-102]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						ES Appendix 7.6.3 Archaeological Evaluation Report Phase 2: Longbridge Roundabout and Reigate Field [APP-103]	
7.7	Landscaping and Visual Impact / Heritage	Information regarding the Zone of Theoretical Visibility for construction compounds (due to the length of time they will be in place).	JLAs	The Zones of Theoretical Visibility (ZTV) are contained in Figures 8.4.1 and 8.4.2 of the ES Landscape, Townscape and Visual Resources Figures. The ZTV is based on the Project's maximum design parameters, including the CARE stack at 48 metres, to provide the worst case assessment for EIA purposes.	N/A	ES Landscape, Townscape and Visual Resources Figures [APP-060 to APP-062]	
7.8	Landscaping and Visual Impact / Heritage	Further information and details in respect of proposals on visually sensitive sites such as car park C and Pentagon Field.	JLAs	ES Chapter 5: Project Description provides a detailed explanation of the Project proposals, and should be read alongside the ES Project Description Figures.	N/A	ES Chapter 5: Project Description [APP-030] and ES Project Description Figures [APP-053]	
7.9	Landscaping and Visual Impact / Heritage	Information regarding the demolition, construction and operation of the proposed CARE facility.	JLAs	The Project proposals for the Central Area Recycling Enclosure facilities are described in paragraphs 5.2.50 to 5.2.53 of ES Chapter 5: Project Description. Further detail on the demolition of the existing CARE facility and construction of the proposed CARE facility are contained in Section 8.6 of ES Appendix 5.3.1: Buildability Report - Part 1.	N/A	ES Chapter 5: Project Description [APP-030] and ES Appendix 5.3.1: Buildability Report - Part 1 [APP-079]	
7.10	Climate Change and Carbon Emissions	Sustainability Assessment	JLAs	Figures 7.6.3 and 7.6.4 of ES Historic Environment Figures identify the designated heritage assets within 3km of the Project site boundary and within the Zone of Theoretical Visibility.	N/A	Planning Statement Appendix D: Sustainability Statement [APP-249]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
7.11	Heritage assets	Not clear if the setting and siting of heritage assets has informed the design and siting for the NRP – evidence and information in (heritage) chapter needs to be cross referenced with text and drawings (in particular CH5). Overall lack of detail on project description works and building siting / design (Care building/ decked car parks and clarity on Car Park X. Lack of details on engineering and flood compensation area and impact on landscape character. Various inconsistencies flagged.	CBC	N/A	Information regarding the nature and appearance of the physical works is presented within ES Chapter 5: Project Description. Cross-referencing to Chapter 5 and the accompanying figures is set out within ES Chapter 7: Historic Environment.	ES Chapter 5: Project Description [APP-030] and ES Chapter 7: Historic Environment [APP-032]	
7.12	Heritage assets	Further information needed to understand if is any historical connection between engineering land and assets 157 and 192 as result of works.	CBC	N/A	No historical connection has been found between assets 157 and 192 and any land within the Project Site Boundary.	N/A	
7.13	Heritage assets	CBC does not accept at this stage that there is no negative impact from the NRP on above ground heritage assets. At this point, the lack of clarity on the development works required as part of the project, the location, form, design of the physical works and the absence of a lighting strategy result in a premature conclusion on these impacts. These details and discrepancies must be addressed.	CBC	N/A	Information regarding the nature and appearance of the physical works is presented within ES Chapter 5: Project Description. Construction lighting is addressed in ES Appendix 5.3.2: Code of Construction Practice, whilst operational lighting is addressed in ES Appendix 5.2.2: Operational Lighting Framework. The assessment of impacts on above ground heritage assets undertaken within Section 7.9 of ES Chapter 7: Historic Environment is based on that updated information.	ES Chapter 5: Project Description [APP-030] ES Appendix 5.3.2: Code of Construction Practice [APP-082] and ES Appendix 5.2.2: Operational Lighting Framework [APP-077] Section 7.9 of ES Chapter 7: Historic	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Environment [APP-032]	
7.14	Heritage assets	Further work is necessary in relation to the heritage assets identified in this report to fully demonstrate the impact of the works on their setting as currently there is a lack of evidence provided. Cumulative impacts must be considered (Asset 27, Asset 23/388, Asset 24, Asset 157 and Asset 192).	CBC	N/A	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment. The assessment of cumulative effects on heritage assets is presented within Section 7.11 of ES Chapter 7: Historic Environment.	Sections 7.9 and 7.11 of ES Chapter 7: Historic Environment [APP-032]	
7.15	Heritage assets	Mitigation and enhancement measures should not just be limited to on site assets but opportunities considered for those heritage assets which are located beyond the development boundary where their setting could be improved by physical works or landscaping within the NRP boundary. Further consideration should be given to the NRP design and layout to further reduce impacts on heritage assets.	CBC	N/A	The overall Project design and the environmental mitigation measures presented within ES Chapter 5: Project Description have been developed with due consideration for opportunities to avoid or reduce impacts on heritage assets.	ES Chapter 5: Project Description [APP-030]	
7.16	Historic Area Appraisal	7e -Archaeology Surrey CC (CBC archaeology consultee) "Overall, this is a decent submission, with the major caveats of not appraising the heritage/archaeological significance of either the airport or the land beneath it, and a local disagreement with the way the nationally-defined assessment methodology ends up grading the heritage assets.	CBC	N/A	The assessment methodology is described in Section 7.4 of ES Chapter 7: Historic Environment. The grading of heritage assets is based on guidance and best practice. A phased programme of archaeological investigation comprising geophysical survey and trial trenching has been undertaken in order to further inform the understanding of archaeological potential at selected locations within the Project site. This included investigations in and around Museum Field and in Pentagon Field. No investigation has been undertaken at Crawter's Field as no works are now proposed here for the	ES Chapter 7: Historic Environment [APP-032] and ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] and ES Appendix 7.6.4: Geotechnical Data Review [APP-104]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		We look forward to the continuation of archaeological evaluation work to better appraise and define the potential of the sites they've not done yet – particularly within and around Museum Field, but also on Pentagon Field and Crawters Field, and in association with the River Mole diversion. To take forward to GAL, we'd strongly recommend a Historic Area Appraisal of the Airport itself to address the gaps in the study highlighted above, and we're hoping that the borehole and geotechnical information that they say will be looked at later will be a comprehensive survey rather than just a few cursory markers here and there, as if not we'll have to request more ground truthing to confirm the archaeological truncation they're confident that has occurred. Absence of this data is a pretty major omission and we'd really like to see this as soon as possible, preferably prior to the grant of a DCO for the project."			Project. No investigation has been undertaken in the area of the proposed River Mole diversion as the works proposed here for the Project are very limited and the area has been previously subject to archaeological investigation as part of the work undertaken for the Gatwick North West Zone. Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report and ES Appendix 7.6.4: Geotechnical Data Review. A request was made through the appropriate Topic Working Group (TWG) for clarity on what is meant by 'a Historic Area Appraisal of the Airport', but no responses were received. We are happy to consider/clarify this matter further if required through the SoCG process.		
7.17	Baseline study	Surrey CC (CBC archaeology consultee) disagree with some of the "significance" assessments in the baseline study. Disagree with scoped out aspects of assessment in Table 7.4.2.	CBC	N/A	The 'significance' assessments set out in ES Appendix 7.6.1: Historic Environment Baseline Report are based on professional judgement. No disagreement has previously been identified with regard to Table 7.4.2 of ES Chapter 7: Historic Environment. The designated heritage assets within the more urbanised areas of Crawley and Horley that have been scoped out of the assessment are	ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] and ES Chapter 7: Historic Environment	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					identified in Section 5.3 of ES Appendix 7.6.1: Historic Environment Baseline Report.	[APP-032] and ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]	
7.18	Outstanding concerns / further work	Surrey CC (CBC archaeology consultee) listed out areas where outstanding concerns and further work required – surface assess satellite contractor compound, flood compensation area car park X, car park Y, ST IDL Extension, new hotel at building compound adjacent to car rental, satellite airport fire surface facility, Airfield surface transport and ground maintenance facility, decked car park north terminal long stay car park 1, NT IDL extension and baggage reclaim, inter terminal transit system, CARE facility (option 1), replacement motor transport facility, NT baggage hall extension, decked car park NT long stage phase 2, development ST (hotel, office, car park H), pumping station 7a, substation north of Pier 7, New Hangar, Pier 7	CBC	N/A	The assessment of impacts and effects in respect of all of these Project elements is presented within Section 7.9 of ES Chapter 7: Historic Environment.	ES Chapter 7: Historic Environment [APP-032]	
7.19	Historic map regression	Surrey CC (CBC archaeology consultee) – the area of the airport has not been adequately tested to support the suggestion that there is little or no meaningful archaeological material buried beneath it. Expect as	CBC	N/A	Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report and ES Appendix 7.6.4: Geotechnical Data Review.	ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] and ES Appendix 7.6.4: Geotechnical	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		a bare minimum a historic map regression for each detailed area of impact showing the successive developments which led to this conclusion and some geotechnical information to verify truncation				Data Review [APP-104]	
7.20	Archaeological remains	Surrey CC (CBC archaeology consultee) – a geo archaeologist should become involved at an early stage to further assist identifying those areas where paleochannels or significant palaeo environmental remains may exist as well as suitable evaluation methodology to test this.	CBC	N/A	A archaeologist will be deployed when planned archaeological works take place in areas identified as having an elevated potential for the presence of paleoenvironmental remains.	Section 6 of ES Appendix 7.8.1 Written Scheme of Investigation for post-consent archaeological investigations – Surrey [APP-105]	
7.21	Visualisation of impacts	Surrey CC (CBC archaeology consultee) – Document includes a good catalogue of what’s likely to be in the STV but without impacts and the visualisations, it’s difficult to assess.	CBC	N/A	The assessment of impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment includes references to visualisations when this is appropriate and helpful.	ES Chapter 7: Historic Environment [APP-032]	
7.22	Landscape / visual impacts	CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y. Please can further details be provided of what these works consist of and what the impact are on tree screening? Car Park X works have potential to have a negative impact on nearby listed buildings.	CBC	N/A	The proposed works required for Car Park X would not have any impact on nearby listed buildings. The trees to the south of Car Park X (along the north side of Charlwood Road) would be retained and these would largely screen any views of the decked car park looking from or across the listed buildings. Visualisations showing the winter and summer views along Charlwood Road along with the massing outline of Car Park X are presented as Figures 8.9.101 – 8.9.104 of the ES.	ES Landscape, Townscape and Visual Resources Figures [APP-060 to APP-062]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
7.23	Charlwood Park Farmhouse	CBC welcome that further consideration has been given to its comments in relation to Charlwood Park Farmhouse however it requests sight of the information and evidence to back up the comments made during the presentation. One aspect that was not discussed at the meeting was the potential opportunity GAL has to improve the setting of this heritage asset – such as removal of some the parking areas around this building. Please can this be addressed as part of the evidence.	CBC	N/A	The assessment of impacts and effects in relation to the Grade II* listed Charlwood Park Farmhouse is presented within Section 7.9 of ES Chapter 7: Historic Environment. No opportunity to improve the setting of this listed building has been identified within the current proposal.	ES Chapter 7: Historic Environment [APP-032]	
7.24	WIZAD Route	GAL has shared that there will be an expected 13% increase in flights using the WIZAD route. This route affects smaller settlements in the district, including Ruser and Warnham as well as the north and east of Horsham town. 13% is considered to be a significant increase in overflight. What other assessments (i.e. Heritage) are being undertaken to understand the increased impact and identify necessary mitigation? Further clarity is also required around the Baseline and With Development scenarios and how GAL is treating the increase in WIZAD traffic under both scenarios.	HDC	N/A	Information regarding the use of the WIZAD route is presented within ES Chapter 5: Project Design. The use of this route has been allowed for in the air noise modelling used for the assessment presented within Section 7.9 of ES Chapter 7: Historic Environment. The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment, with the methodology set out in ES Appendix 7.6.1: Historic Environment Baseline Report. The application of the guidance has been agreed with Historic England as being appropriate.	ES Chapter 7: Historic Environment [APP-032] and ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
7.25	Heritage Assets	Heritage implications for air noise on listed buildings and methodology issues. The Council does not agree with GAL's interpretation of Historic England's methodology and considers that GAL should consider the 90 or so heritage assets within our district under sensitivity Category D.	MVDC	N/A	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment, with the methodology set out in ES Appendix 7.6.1: Historic Environment Baseline Report. The application of the guidance has been agreed with Historic England as being appropriate.	ES Chapter 7: Historic Environment [APP-032] and ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]	
7.26	Impact on surviving archaeology	The impact on surviving archaeology within the site of the current airport has not been included within the impact assessment. The only acknowledgement of the Airport itself as having heritage interest is in relation to designated assets. Further assessment is required within the airport boundary itself.	WSCC	N/A	The archaeological potential of land within the current airport is discussed within ES Appendix 7.6.1: Historic Environment Baseline Report. This includes a review of available borehole and geotechnical information as part of an examination of truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report and data are presented within ES Appendix 7.6.4: Geotechnical Data Review.	ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] and ES Appendix 7.6.4: Geotechnical Data Review [APP-104]	
7.27	Heritage assets	Use of the Airports NPS, whilst obviously acceptable as the national methodology, leads to what is considered to be a downgraded assessment system for heritage assets. The assessment methodology also draws upon the Design Manual for Roads and Bridges and its accompanying Environmental Assessment methodology. Only World Heritage Sites would qualify as being of 'Very High' significance under this process, with nationally important sites as 'High' and regionally significant as	WSCC	N/A	The assessment methodology is described in Section 7.4 of ES Chapter 7: Historic Environment. The grading of heritage assets is based on guidance and best practice. The attribution of levels of 'significance' within ES Appendix 7.6.1: Historic Environment Baseline Report are based on the experience and judgement of the authors of that document. Some level of disagreement is anticipated given the absence of substantive guidance on this issue; however, it is considered that any adjustments to the levels of 'significance' would not result in changes to the assessed impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment.	ES Chapter 7: Historic Environment [APP-032] and ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		'Medium' (or 'Moderate' as the PEIR baseline refers). Locally significant sites are rated as 'Low'. Non NSIP assessment methodology omits the 'Very High' category meaning each class of asset is assigned a higher rating than here. Therefore, WSCC disagree with some of the 'significance' assessments in the Baseline Study, and most of the sites are more important to regional/local commentators, than the assessment process has concluded.					
7.28	Historic Area Appraisal	WSCC expects to see an Historic Area Appraisal of the airport itself to address the gaps in the baseline study. It is hoped the borehole and geotechnical information that GAL intend to review will be a comprehensive survey; if not, further ground truthing will be required to confirm the archaeological truncation that has been stated has occurred. Absence of this data is a major omission and further consultation on these matters will be required with relevant stakeholders prior to DCO application.	WSCC	N/A	Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report and ES Appendix 7.6.4: Geotechnical Data Review. A request was made through the appropriate Topic Working Group (TWG) for clarity on what is meant by 'a Historic Area Appraisal of the Airport', but no responses were received. We are happy to consider/clarify this matter further if required through the SoCG process.	ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101] and ES Appendix 7.6.4: Geotechnical Data Review [APP-104]	
7.29	Views	Protection of views of listed St Bartholomew's Church during construction of bridges and roadworks around Church Meadows and River Mole and impact of works compound and any equipment.	RBBC	N/A	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment. This includes impacts relating to the Church of St Bartholomew (Horley) during highways improvement works.	ES Chapter 7: Historic Environment [APP-032]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
7.30	Church Meadows	Still need to agree final landscaping and replanting of Church Meadows and long term management.	RBBC	N/A	<p>There will be relatively minor works within Church Meadows, associated with the road improvements and bridge widening at Longbridge Roundabout. Replacement landscaping will be provided at the boundary with Brighton Road and a new footbridge provided to link the replacement open space on the west bank of the River Mole at Gatwick Dairy Farm with Church Meadows.</p> <p>Volume 3 of the Design and Access Statement (APP-255) Figure 97 Longbridge Roundabout Open Space / Ecological Mitigation Indicative Plan shows the indicative proposals for Longbridge Roundabout. These have been shared previously with the Local Authorities at Topic Working Groups.</p> <p>Landscape proposals and management and maintenance activities are set out in ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP). Surface access landscape proposals are included in Figures 1.2.4 to 1.2.15, which include Longbridge Roundabout. Figure 1.2.3 Longbridge Roundabout is a sketch landscape concept for the area of replacement open space and the existing connected open space at Church Meadows. Annex 3 of the oLEMP includes typical planting schedules of species that would be appropriate to this settlement edge/farmland interface. Annex 1 includes a typical programme of operations.</p>	<p>The Outline Landscape and Environment Management Plan [APP-113] – Part 1, provides information on the concept landscaping proposed at Section 4.7 and Figure 1.2.3). Native hedgerow and trees are to be reinstated on Brighton Road.</p>	

Table 8: Ecology

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.1	Ecology Assessment	The method for the assessment of effects on ecology receptors will follow the CIEEM Guidelines for Ecological Impact Assessment.	JLAs	N/A	The methodology for the assessment of effects on ecology receptors follows CIEEM Guidelines as set out in Para 9.4.87 of ES Chapter 9: Ecology and Nature Conservation.	Para 9.4.87 of ES Chapter 9: Ecology and Nature Conservation [APP-034]	
8.2	Ecology Assessment	Baseline survey extent and project Zone of Influence to be discussed and agreed via the EWG	JLAs	N/A	As set out in Para 9.4.17 of ES Chapter 9: Ecology and Nature Conservation (APP-034) the extent of survey work was agreed in consultation with Natural England.	Para 9.4.17 of ES Chapter 9: Ecology and Nature Conservation [APP-034]	
8.3	Ecology Assessment	Scope of designated sites to be assessed will be as set out in the PEIR	JLAs	N/A	<p>The scope of designated sites assessed is set out in paras 9.4.6 and 9.4.7 of ES Chapter 9: Ecology and Nature Conservation.</p> <p>The initial search area for European designated sites (including SACs, SPAs and Ramsar sites) covered the area within 20 km of the Project site boundary. This buffer was extended for SACs designated for bats and for SACs/SPAs which are sensitive to changes in air quality from vehicle emissions and located within 200 m of major roads. An area within 5 km of the Project site was searched for other sites (SSSIs, National Nature Reserves (NNRs), Local Nature Reserves (LNRs) and locally-designated sites).</p>	Paras 9.4.6 and 9.4.7 of ES Chapter 9: Ecology and Nature Conservation [APP-034]	
8.4	BNG	There is no detail of any biodiversity enhancements from this Project. This should use Defra Metric v3.0 to ensure compensation is sufficient and that BNG can be delivered for this NSIP. The Environment Act 2021 places a 10% BNG requirement on development unless exempt which extends to nationally significant infrastructure projects which will become mandatory by autumn 2023. Opportunities to deliver enhancements need to be explored in consultation with appropriate stakeholders as a mechanism to deliver BNG.	JLAs	BNG approach to be adopted to be determined as required by legislation at the time of submission.	The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application and is available to view on PINS website. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.	ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.5	Habitat Regulations	The HRA focuses on the effects of the NRP alone rather than in-combination. It is unclear what level of growth has been included within the in-combination assessment.	JLAs	Section 5 of the HRAR includes an in-combination assessment, both screening and appropriate assessment. Several comments that the HRAR was hard to find. Can you explain how we can improve signposting to this within the ES? Other comments in relation to inclusion of ammonia in assessment. We will discuss this work with you in the course of the TWG sessions, and Ammonia will be included in the final ES.	The approach to HRA and its conclusions with respect to both effects alone and in combination were discussed extensively with Natural England during pre-submission discussion. Annex B Strategic Transport Modelling Report of the Traffic Assessment sets out the details of what has been included with respect to the in combination assessment.	Section 4.5.10 <i>et seq.</i> and Section 5 of ES Appendix 9.9.1 Habitat Regulations Assessment Part 1 and Part 2 [APP-134 and APP-135] Annex B Strategic Transport Modelling Report of the Traffic Assessment [APP-260]	
8.6	Mitigation/Long-term Management	WSSC would expect the ES to include a long-term site/habitat management plan covering all the existing and proposed areas of biodiversity interest.	JLAs	Mitigation and management plan to be submitted with ES. Will be long term and include details of monitoring to be undertaken. Mitigation areas are a considerable size and several are outside of the airport's boundary.	An Outline Landscape and Ecology Management Plan (oLEMP) has been submitted with the ES. This includes long-term habitat management strategies for the primary habitats to be created as part of the Project.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.7	Consultation	HDC welcome the opportunity for a Project biodiversity topic group to work closely with any landscape and other topic groups to ensure that environmental impacts during construction will be minimised and that compensatory measures are developed in an integrated manner to deliver multiple benefits.	JLAs	GAL will set up a Biodiversity Engagement Group. Terms of reference to be decided but will include discussions on the approach to mitigation, enhancement and BNG.	The Biodiversity Working Group met through the winter of 2022 and early 2023. Discussions included with respect to approach to surveys, habitat creation, mitigation/enhancement and BNG.	Section 9.3 of ES Chapter 9 Ecology and Nature Conservation [APP-034]	
8.8	Survey Extent	If there is any risk of impacts (such as air quality, river quality, and noise) extending beyond the site boundary, a broader survey area will be required, which should be based on the Zone of Influence. Surveys of protected species, such as Great Crested Newt and Water Vole, should also extend beyond the project site boundary. Apart from bat surveys, no further justification for survey areas has been given.	JLAs	The survey area chosen is based on the potential for effects to receptors, and does include land outside of the area to be impacted. For example, surveys of ponds for GCN, were undertaken where there was habitat connectivity to suitable terrestrial habitat. Where the project has evolved, further surveys will be undertaken.	Surveys were undertaken beyond the Project boundary, depending on where there was the potential for effects to ecology receptors.	Para 9.4.9 of ES Chapter 9 Ecology and Nature Conservation [APP-034]	
8.9	Biodiversity and Arboriculture	Tree survey data.	JLAs	Annex 4 of the Outline Landscape and Ecology Management Plan (oLEMP) contains preliminary Tree Removal and Protection Plans for the surface access proposals, within Parts 3 and 4 of the oLEMP. Further tree survey work is ongoing across the other areas affected by the Project and will be shared with the LAs when complete.	N/A	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.10	Biodiversity and Arboriculture	Terms of Reference for the Biodiversity Sub Group.	JLAs	GAL would propose to discuss appropriate Terms of Reference with the LAs as part of the SoCG discussions on this topic.	N/A	N/A	
8.11	Biodiversity and Arboriculture	Draft Outline Landscaping proposals.	JLAs	<p>Illustrative landscape proposals are set out in ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (oLEMP) and is available to view on PINS website. Annex 4 of the oLEMP contains preliminary Tree Removal and Protection Plans for the surface access proposals, contained within Parts 3 and 4 of the oLEMP. In addition to this, Figures 1.2.1 to 1.2.15 of the oLEMP Part 1 contains illustrative landscape planting proposals for the surface access improvements at South Terminal roundabout, North Terminal roundabout and Longbridge roundabout, in addition to landscaping proposals for Museum Field and Car Park B.</p> <p>Additional supporting imagery of the landscaping proposals for the surface access proposals, including the relationship to the existing trees, is also contained in the Design and Access Statement Volume 3 (Section 5.8 on the Surface Access Corridor zone).</p>	N/A	<p>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]</p> <p>Design and Access Statement Volume 3 [APP-255]</p>	
8.12	Biodiversity and Arboriculture	Engagement on Biodiversity Net Gain (BNG) Strategy.	JLAs	<p>The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application and is available to view on PINS website.</p> <p>The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.</p>	N/A	ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136]	
8.13	Biodiversity and Arboriculture	Habitat enhancement plans, including Bechstein's bats.	JLAs	<p>The Project proposals for landscape and ecological planting proposals are described in paragraphs 5.2.146 to 5.2.149 of ES Chapter 5: Project Description. This includes proposals for the creation and enhancement of habitats, including woodland, tree, scrub, shrub, wetland, amenity and grassland. The areas for environmental mitigation are shown on Figure 5.2.1f of the ES Project Description figures.</p> <p>Further detail on the ecology strategy and ecology mitigation measures is contained in Sections 6</p>	N/A	<p>ES Chapter 5: Project Description [APP-030], ES Project Description Figures [APP-053]</p> <p>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				and 7 of ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan. In particular, Section 7 outlines the ecological mitigation measures to specific to each relevant species.			
8.14	Biodiversity and Arboriculture	Information regarding the key relationship between drainage works / strategy and impacts on ecology.	JLAs	ES Chapter 9: Ecology and Nature Conservation undertakes an ecological assessment taking account of the drainage proposals forming part of the Project, as well as the potential impacts to ecology from changes in watercourse flows and drainage systems during the construction and operation of the Project (as per the assessment contained in ES Chapter 11: Water Environment.	N/A	ES Chapter 9: Ecology and Nature Conservation [APP-034] and ES Chapter 11: Water Environment [APP-036]	
8.15	Mitigation Priority Species and Habitats	The IROPI case in the ES must demonstrate adequate compensation measures to mitigate all impacts on priority species and habitats, not just significant ones.	HDC	N/A	As set out in Section 5.3.65 of ES Appendix 9.9.1 Habitats Regulations Assessment Report, the Project (either alone, or in-combination) does not result in any adverse effects on integrity (AEOI) on any European site. As such, there is no requirement for a case for IROPI to be made. ES Chapter 9: Ecology and Nature Conservation sets out the impacts, effects and any necessary mitigation on all receptors, including priority species and habitats.	ES Chapter 9: Ecology and Nature Conservation [APP-034] ES Appendix 9.9.1 Habitats Regulations Assessment Report [APP-135]	
8.16	Biodiversity & Geological Conservation	What opportunities are being taken to conserve biodiversity and geological conservation interests, in line with ANPS para 5.91 and Horsham District Planning Framework Policy 31?	HDC	N/A	The provision of the Ecology Strategy, as set out in the oLEMP, provides a strategic overview of how the Project will conserve and enhance biodiversity interests, in line with both local and national planning policy. The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application and is available to view on PINS website. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.	ES Chapter 9: Ecology and Nature Conservation [APP-034] ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116] ES Appendix 5.3.2 Code of Construction Practice [APP-082] ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136]	
8.17	Landscape and Ecology Management Plan (LEMP)	What consideration has been given to Local Wildlife Sites, other irreplaceable habitats and the Nature Recovery Network? What buffer zones will be put into place and how will habitats be	HDC	N/A	The impacts to LWS, irreplaceable habitats and the NRN are assessed within ES Chapter 9: Ecology and Nature Conservation.	ES Chapter 9: Ecology and Nature Conservation [APP-034]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		joined up? Detail should be included in a Landscape and Ecology Management Plan (LEMP) for local authority comment.			Details of buffer zones are set out in the CoCP as their establishment relates to protection during construction.	ES Appendix 5.3.2 Code of Construction Practice [APP-082]	
8.18	Landscape and Ecology Management Plan (LEMP)	Bat activity data should be added to any assessment of Important Hedgerows in line with other NSIPs. Lighting design should consider landscape/ecology elements of the ES and embed these in the LEMP.	HDC	N/A	<p>No Important Hedgerows were identified in the Order Limits.</p> <p>A lighting strategy is included in the CoCP to ensure that construction lighting was directed to where it was needed and did not significantly increase levels of artificial lighting on sensitive habitats, such as retained woodland and river corridors. Lighting will be designed in accordance with Institute of Lighting Professionals /Bat Conservation Trust guidelines. Construction task lighting will be directed to where it is needed only, to avoid light spillage. Accessories such as hoods, cowls and shields will be used to direct light to the intended area only. Light levels will be as low as the guidelines permit. If construction lighting is not needed, it will be avoided.</p> <p>Lighting design principles will be considered in the development of detailed design, as per the Operational Lighting Framework in Appendix 5.2.2 of the ES. These principles include details of the installation requirements of permanent lighting to be installed for the operational phases of the Project including positioning and the use of shields to prevent unintended light spill.</p> <p>Lighting would be designed to avoid disturbance to areas of value for bats by shielding adjacent habitats of value.</p>	ES Appendix 5.3.2 Code of Construction Practice [APP-082], ES Appendix 5.2.2 Operational Lighting Framework [APP-077]	
8.19	BNG	Further detail on BNG should be provided. How have stakeholders been engaged? Can GAL demonstrate they have met Schedule 4 of the Infrastructure Planning (EIA) Regulations 2009 in delivering reasonable opportunities to deliver environmental benefits?	HDC	N/A	The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.	ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136] ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Substantial new ecological benefits have been incorporated into the Project to ensure that this requirement is met. This includes, for example, the realignment of the River Mole to naturalise a length of channel and an expansion of the wildlife areas already managed by GAL. Details are set out in the oLEMP.		
8.20	Viewpoints	Viewpoint 18, which was subsequently exclude from the ES assessment, was shared with the Council's Senior Landscape Architect, who suggested views from north of the river (as opposed to east of the watercourse as in Viewpoint 18) would be wider with greater opportunity to see the development. Can GAL please respond re: why views from north of the river were not used? Is the CARE facility, in particular, the flue, confirmed as not being visible from VP 18?	HDC	N/A	Appendix 8.6.2: Additional Candidate Viewpoint Photography of ES Chapter 8: Landscape, Townscape and Visual Resources includes a panoramic photograph from Ifield as Viewpoint 18. It was considered that due to a combination of the distance from Gatwick and the intervening vegetation there would be no opportunity for views of the Project. It can be confirmed that the flue stack of the CARE would not be visible.	ES Appendix 8.6.2: Additional Candidate Viewpoint Photography [APP-111]	
8.21	Baseline Survey	Baseline Survey - PEIR Fig. 4.2.1c is labelled 'Existing Location/Environmental Features identified in PEIR'. However, it does not show all the environmental features identified in the PEIR and is therefore misleading. The Phase One Habitat Survey (Fig. 9.6.3), for example, shows additional environmental features such as woodlands, hedgerows and neutral grasslands, which should also feature in Fig. 4.2.1c.	WSCC	N/A	Detailed environmental features are described in ES Chapter 4 Existing Site and Operation while Figure 4.2.1c provides an overview of the key environmental features at a large scale. ES Chapter 9 Ecology and Nature Conservation and its corresponding figures and appendices provide further detail that have informed the assessment of effects.	ES Chapter 4 Existing Site and Operation [APP-029] ES Chapter 9 Ecology and Nature Conservation [APP-034]	
8.22	Baseline Survey	Baseline Survey - Linear features, such as streams, ditches and hedgerows, didn't show up very clearly in the Phase One Habitat Survey (Fig. 9.6.3) presented in the PEIR. It is requested that they are highlighted. e.g. Crawler's Brook is highlighted in Fig. 4.2.1c but not shown in the Phase One Habitat Survey.	WSCC	N/A	All linear features are shown on the relevant figures.	ES Existing Site and Operation Figures [APP-055] ES Appendix 9.6.2: Ecology Survey Report – Part 1 and Part 2 [APP-125 and APP-126]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.23	Construction Phase	Construction - Table 9.8.1 - Protective fencing is proposed during the construction period where trees, woodlands and hedgerows are to be retained. Such fencing should also be used to protect other habitats, such as rivers, ponds and some grasslands, including those supporting reptiles.	WSCC	N/A	All features requiring it will be protected with appropriate fencing, as set out in the CoCP. This will include, for example where necessary, rivers and ponds.	ES Appendix 5.3.2 Code of Construction Practice [APP-082]	
8.24	BNG	BNG - The proposed areas for habitat creation and enhancement appear rather isolated, though linked to some extent by features such as the R. Mole. WSCC requests improved habitat connectivity and a more joined up approach with the landscape team on blue and green infrastructure.	WSCC	N/A	The approach to landscape-scale habitat connectivity is set out in the Ecology Strategy within the oLEMP (Appendix 8.8.1 of the ES). The areas of new habitat creation are linked through both the River Mole and Gatwick Stream, along with their respective corridors. Linking habitat in such a manner ensures that there is a coherent ecology with respect to both blue and green infrastructure.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.25	BNG	BNG - WSCC would expect enhancements 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.	WSCC	N/A	Opportunities to create enhanced corridors beyond the confines of the existing airport boundary have included those at Brook Farm and Longbridge Roundabout, as set out in the oLEMP (Appendix 8.8.1 of the ES).	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.26	Baseline Survey/BNG	Baseline Survey/BNG - WSCC expects the ES to include detailed, annotated plans showing the locations of all the habitats to be retained, enhanced and created, and also those likely to be lost. Insufficient information is shown in the PEIR	WSCC	N/A	The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application. This includes habitat loss/gain figures for the different time periods in the Project. Substantial new ecological benefits have been incorporated into the Project to ensure that this requirement is met. This includes, for example, the realignment of the River Mole to naturalise a length of channel and an expansion of the wildlife areas already managed by GAL. Details are set out in the oLEMP.	ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136] ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.27	Enhanced management	What opportunities are there for enhanced management of existing sites/habitats within the Project boundary, such as the extensive areas of amenity grassland alongside the runways and roads? A change in management from mowing to cut and collect could also be employed,	WSCC	N/A	The management of the airfield grassland follows strict CAA protocols to ensure the safeguarding of aircraft. As such, no changes to either the composition or management of the airfield grassland are possible. Other areas of the airport are also managed in accordance with various management plans, depending on function.		

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		thereby reducing the vigour of the sward and encouraging flora diversity. Reduced herbicide use would be beneficial. Any new areas of grass, including adjacent to runways and buildings, could be established on low fertility subsoil (rather than high fertility topsoil) to reduce vigour and encourage floral diversity.					
8.28	Mitigation and Enhancement	Mitigation and Enhancement - Mitigation, compensation and enhancement measures should not be limited to within the airport boundary.	WSCC	N/A	Opportunities to create enhanced corridors beyond the confines of the existing airport boundary have included those at Brook Farm and Longbridge Roundabout, as set out in the oLEMP (Appendix 8.8.1 of the ES).	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.29	Mitigation measures	Will any sections of river or stream be netted, including the re-aligned R. Mole?	WSCC	N/A	It is our intention to avoid netting wherever possible consistent with Airport Safeguarding requirements. The new 300m section of naturalised river corridor replaces an engineered section which is currently netted. It is not proposed to net the new river valley as vegetation can be allowed to establish within it which will obscure the watercourse.	ES Chapter 9: Ecology and Nature Conservation [APP-034]	
8.30	Mitigation and Enhancement	Mitigation and Enhancement -Will GAL consider possibilities for advance mitigation, habitat creation, biodiversity enhancement & tree planting?	WSCC	N/A	The timing of habitat creation works will be set out in the final LEMP for the Project this will include looking for opportunities to undertake advance planting.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.31	Mitigation and Enhancement – Ecological Surveys	Mitigation and Enhancement -Which species will be covered in the precommencement ecological surveys?	WSCC	N/A	Pre-commencement surveys will be undertaken for species for which licensing is required, including, but not limited to, bat roosts, great crested newt, dormice and badger, along with Schedule 1 birds and reptiles.	Table 9.8.1 of ES Chapter 9: Ecology and Nature Conservation [APP-034] ES Appendix 5.3.2: Code of Construction Practice [APP-082] ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.32	Mitigation and Enhancement – key habitats	Mitigation and Enhancement - A clear plan or strategy for biodiversity monitoring should be presented in the ES. This should include monitoring of the condition of key habitats and population monitoring of key species.	WSCC	N/A	The outline monitoring strategy for ecology receptors post development is set out in the oLEMP.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.33	Arboriculture	There is a strong reliance throughout the PEIR that the maturity of planting will be used to mitigate impacts, although the 'Landscape Design Year' is 2038, there are significant elements of the project where landscape planting proposals will be immature, not just visually, but in ecosystem service provision too. WSCC requests GAL review and present opportunities for substantial advance planting	WSCC	N/A	The timing of habitat creation works will be set out in the final LEMP for the Project this will include looking for opportunities to undertake advance planting.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-114 to APP-116]	
8.34	Pentagon Field	Concerns about works to Pentagon Field, being used as a site for spoil, and its potential impact to Lower Pickett Woods to the south. Impacts appear to be downplayed when taking account of proposed development in this sensitive location.'	WSCC	N/A	Lower Pickett Woods will be protected through the implementation of an appropriate buffer (15m) and suitable fencing.	Table 9.8.1 of ES Chapter 9: Ecology and Nature Conservation [APP-034] ES Appendix 5.3.2: Code of Construction Practice [APP-082]	
8.35	Soil Bunds	Are soil bunds of adequate distance from Pickets Woods to avoid impacts through root/soil disturbance?	WSCC	N/A	Lower Pickett Woods will be protected through the implementation of an appropriate buffer (15m) and suitable fencing. a	Table 9.8.1 of ES Chapter 9: Ecology and Nature Conservation [APP-034] ES Appendix 5.3.2: Code of Construction Practice [APP-082]	
8.36	Extensive Vegetation Lost	Apparent that further extensive vegetation loss is proposed as part of these highway proposals. Loss would occur, not just through direct landtake required for operational footprint, but also through temporary construction works. For example, the hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis. Are	WSCC	N/A	The total vegetation loss is described in ES Appendix 9.9.2 Biodiversity Net Gain Statement and figures therein. The hedgerow and mature oak tree line along the Border Path have been retained in the final design.	ES Appendix 9.9.2 Biodiversity Net Gain Statement [APP-136]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		the trees mentioned safely retained? If lost, is essential compensation provided at a suitable quantity?					
8.37	Extensive Vegetation Lost/Enhancement Biodiversity	It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, e.g. the creation of wildflower meadows on subsoil/nutrient poor soil.	WSCC	N/A	<p>The majority of habitat to be lost during highways works is woodland and, as such, the outline landscape design for these works has focused on the provision of woodland, where possible. Details of the outline highways design are set out in Outline Landscape and Ecology Management Plan.</p> <p>The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.</p>	<p>Surface Access Landscape Proposals contained in ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan – Part 1 [APP-113]</p> <p>ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136]</p>	
8.38	Extensive Vegetation Lost	Other areas of concern for this vegetation loss include: <input type="checkbox"/> South Terminal: new significant effect that would be moderate to adverse in the long term – removing mature vegetation; Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan?	WSCC	N/A	<p>The removal of vegetation around the South Terminal Roundabout works has been minimised, where possible, during design to date. The final design of the highways works will seek to minimise the loss further, as far as practicable.</p> <p>The loss of woodland is compensated for, as far as is practicable within the confines of the safeguarding requirements of an operational airport, to ensure that the overall loss is considered to be of minor adverse significance, once planting has matured.</p>	ES Chapter 9: Ecology and Nature Conservation [APP-034]	
8.39	Extensive Vegetation Lost	<input type="checkbox"/> A23 London Road: the Riverside Garden Park would be impacted by permanent vegetation removal at various widths: 8m, 9m and 13m in width; <input type="checkbox"/> Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan? <input type="checkbox"/> Longbridge Roundabout - greater extent of vegetation removal required, up to 45m width. Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan?	WSCC	N/A	<p>The removal of vegetation in both locations has been minimised, where possible, during design to date. The final design of the highways works will seek to minimise the loss further, as far as practicable.</p> <p>The loss of woodland is compensated for, as far as is practicable within the confines of the safeguarding requirements of an operational airport, to ensure that the overall loss is considered to be of minor adverse significance, once planting has matured.</p>	ES Chapter 9: Ecology and Nature Conservation [APP-034]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.40	Extensive Habitat Lost	It is not just the area or extent of vegetation loss that is significant, it is the entire habitat itself which is lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, let alone BNG achieved, given the previous concerns raised in comments on the PEIR. Is suitable compensation provided throughout?	WSCC	N/A	<p>The Project has been designed to retain as much vegetation as possible to ensure that the vegetation connection along the Gatwick Stream near to the A23 is maintained.</p> <p>Every opportunity will be sought during detailed design to further minimise the loss of vegetation in this area.</p> <p>Suitable compensation planting for loss of woodland has been provided throughout the Project as far as is practicable within the constraints of aircraft safeguarding.</p> <p>The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.</p>	<p>ES Chapter 9: Ecology and Nature Conservation [APP-034]</p> <p>ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136]</p>	
8.41	Zone of Theoretical Visibility	An updated Zone of Theoretical Visibility (ZTV) showing the proposed changes to theoretical visibility caused by the new highways proposals (including the proposed noise barrier and removal of extensive vegetation along the road corridor) and the implications for visual impacts to receptors within proximity of the changes, needs to be presented to stakeholders to allow for meaningful discussions on viewpoint locations and photography undertaken by GAL.'	WSCC	N/A	A Zone of Theoretical Visibility (ZTV) for the Project is included at ES Chapter 8: Landscape, Townscape and Visual Resources Figure 8.4.1. Photographic viewpoint locations are illustrated on Figure 8.4.4, and Photography at Figures 8.4.5 to 8.4.32 and Photomontages at Figures 8.9.1 to 8.9.128.	ES Figures 8.4.1,8.4.5 to 8.4.32 and 8.9.1 to 8.9.128 [APP-047-APP-070]	
8.42	Extensive Vegetation Lost Mitigation	Measure put in place to reduce vegetation loss including mature trees on boundaries of neighbouring land. What are these measures and do they reduce vegetation loss?	WSCC	N/A	Illustrative landscape proposals are set out in ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan (oLEMP). It contains preliminary Tree Removal and Protection Plans for the Surface Access proposals, Parts 3 and 4 of the oLEMP. Figures 1.2.1 to 1.2.15 of the oLEMP includes illustrative landscape proposals.	<p>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113-APP-116]</p> <p>Design and Access Statement Volume 3 [APP-255]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					The Design and Access Strategy (DAS) Volume 3 (Section 5.8 includes the Surface Access Corridor zone.)		
8.43	Native woodland and grassland habitats	Reinstatement of appropriate native woodland and grassland habitats to integrate with neighbouring landscape. Is this reflected in landscaping plans?	WSCC	N/A	Illustrative landscape proposals for the Surface Access proposals are set out in ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP) Figures 1.2.1 to 1.2.15. Native species and appropriate plant communities are included to ensure integration with adjacent vegetation and character.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 - APP-116]	
8.44	Woodland Planting	Reinstatement of predominantly woodland planting within the highway corridor to screen and soften infrastructure. Is this reflected in landscaping plans?	WSCC	N/A	<p>Illustrative landscape proposals for the Surface Access proposals are set out in ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP) Figures 1.2.1 to 1.2.15. Native species and appropriate plant communities are included to ensure integration with adjacent vegetation and character.</p> <p>Planting types and locations are in accordance with Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13</p>	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 - APP-116]	
8.45	A23 London Rd southbound	A23 London Rd southbound - Illustrative design shows a large area of highway planting and colonising vegetation to be removed to facilitate a proposed 2m footway and sets back signage even further, maintains clear access to slope and ditch. Is this a requirement or a desire? Is this compensated for elsewhere as this is to facilitate new infrastructure (with some encroachment improvement).	WSCC	N/A	<p>Illustrative landscape proposals for the Surface Access proposals are set out in ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP).</p> <p>Planting types and locations are in accordance with Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13.</p> <p>Safety and operational requirements include removal of vegetation that has colonised and encroached to the road edge to accommodate footway, safety barrier, sight lines to signage and maintenance access.</p>	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 to APP-116]	
8.46	Land East of Museum Field	Land East of Museum Field - Flood compensation area 2.6m deep and	WSCC	N/A	Yes, all perimeter trees around Museum Field will be protected with appropriate fencing.	ES Appendix 5.3.2: Code of Construction Practice [APP-082]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		earth bund 6m high. Are trees preserved?					
8.47	Longbridge Roundabout & carpark B	Longbridge Roundabout & carpark B - Replacement roadside hedgerows, trees and woodland shown. Are they suitable?	WSCC	N/A	The design of all replacement roadside woodland, trees and hedgerows has been agreed with the Highways Design Engineers and, as such, are considered suitable.	N/A	
8.48	Pentagon Field	Pentagon Field - spoil platform (?) to 4m high; woodland belt bordering Balcombe Rd; and woodland copse proposed to south. Are trees preserved?	WSCC	N/A	All perimeter trees around Pentagon Field will be preserved and protected with appropriate fencing.	ES Appendix 5.3.2: Code of Construction Practice [APP-082]	
8.49	SoCG	SoCG: WSCC request for three matters of interest for each ecology & landscape/visual, these are to be considered by GAL (no confirmation). Has this been actioned or addressed?	WSCC	N/A	GAL is unclear what specific matters this comment relates to; however, it is hoped they have been addressed in the surrounding comments in this table, or can otherwise be addressed in the development of the SoCG.	N/A	
8.50	SoGC Ecology and Nature Conservation	The following have not been included within the SoGC Ecology and Nature Conservation: <ul style="list-style-type: none"> Arboricultural assessment methodology and surveyed areas. Arboricultural impact assessment Arboriculture - planting establishment and tree aftercare 	WSCC	N/A	GAL is happy to extend the scope of the SoCG to include arboriculture survey and impact assessment as requested.	N/A	
8.51	SoGC Landscape, Townscape and Visual	The following have not been included within the SoGC Landscape, Townscape and Visual: <ul style="list-style-type: none"> Arboriculture - planting and establishment Arboriculture - assessment of effects Arboriculture - compensation for tree loss 	WSCC	N/A	The scope of SoCG will be increased to include Arboriculture. Further arboricultural surveys and appraisals are ongoing. Illustrative landscape proposals are set out in ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP). It contains preliminary Tree Removal and Protection Plans for the Surface Access proposals, Parts 3 and 4 of the oLEMP. Figures 1.2.1 to 1.2.15 of the oLEMP includes illustrative landscape proposals. Native species and appropriate plant communities are included to ensure integration with adjacent vegetation and character.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 to APP-116]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>Planting types and locations are in accordance with Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13.</p> <p>The design of all replacement roadside woodland, trees and hedgerows has been agreed with the Highways Design Engineers and, as such, are considered suitable.</p> <p>Areas of replacement public open space are included at Longbridge roundabout/Church Meadows and Car Park B and represent a significant increase in overall green space within the Project.</p>		
8.52	DCO draft recommendations	<p>Have the following been considered from the DCO draft recommendations:</p> <ul style="list-style-type: none"> • Part 4 Sec. 23 - multiple amendments recommended; 23 (7). • 'hedgerow' not defined in act stated. Are these concerns addressed? • Schedule 2 (requirements) - recommend including: • Construction Environmental Management Plan (CEMP); • Vegetation Clearance Plans; • Vegetation Retention Plans; • Landscape Maintenance and Management Plan (LMMP); • Detailed Landscape Plan (soft and hard); • Arboricultural Method Statement (AMS) inclusive of associated Tree • Protection Plans (TPP). • Amendments to approved details - The relevant planning authority is expected to approve such amendments which must be stated within 	WSCC	N/A	<p>GAL has provided responses to matters raised on the draft DCO under the transport-related tracker. Please refer to that table for such responses.</p>	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		<p>this section. Is this concern addressed?</p> <ul style="list-style-type: none"> • Time limits - completion date expected • Highway works - include local highways • Construction Environmental Management Plan - further details and adherence to AMS <p>SCHEDULE []: DOCUMENTS TO BE CERTIFIED - include:</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan (CEMP); • Vegetation Clearance Plans; • Vegetation Retention Plans; • Landscape Maintenance and Management Plan (LMMP); • Detailed Landscape Plan (soft and hard); • Arboricultural Impact Assessment (with tree retention and removal plan); • Arboricultural Method Statement (AMS) inclusive of associated Tree Protection Plans (TPP). 					
8.53	Biodiversity	On Additionality - There is a level of guidance available for this – (examples included). It would be expected that any biodiversity net gain calculation or assessment would demonstrate additionality, where required.	SCC	N/A	The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application and is available to view on PINS website. The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.	ES Appendix 9.9.2 Biodiversity Net Gain Statement [APP-136]	
8.54	Biodiversity	You state mitigation will be informed by pre-commencement surveys, and that this approach has been provided to Natural England. Have you received a response from Natural England on this approach?	SCC	N/A	Yes, Natural England have confirmed that pre-commencement surveys are acceptable in discussions throughout consultation, most recently during a meeting held on 20/09/23. This will be confirmed in the Statement of Common Ground with Natural England through relevant discussions.	N/A	
8.55	Biodiversity	Rivers for BNG – this does require a certified individual (on completion of the MoRPH Rivers training).	SCC	N/A	Yes. The ecologists who completed the MoRPH survey are appropriately certified.	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
8.56	Log of trees or vegetation	LTV.04.01 Baseline Environment no log of trees or vegetation appears to have been undertaken which is needed to assess the impacts and inform the mitigation	RBBC	N/A	Annex 4 of the Outline Landscape and Ecology Management Plan (oLEMP) contains preliminary Tree Removal and Protection Plans for the surface access proposals, within Parts 3 and 4 of the oLEMP. Further tree survey work is ongoing across the other areas affected by the Project and will be shared with the LAs when complete.	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 to APP-116]	

Table 9: Landscape

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
9.1	Viewpoints	Locations from which there is no existing view of infrastructure at Gatwick and it is highly unlikely that there would be a discernible view of proposed development; VP 10: Smallfield; VP 15: FP340 north-east of Charlwood; VP 18: Ifield; VP 19: High Weald AONB.	JLAs	Assessment of these locations is not included in the ES.	N/A	N/A	
9.2	Viewpoints	Locations from which there is a barely discernible element of existing infrastructure at Gatwick and any increase in development is likely to be barely discernible and have no more than a negligible impact on views; VP 1: Sussex Border Path (FP368) M23 junc. 9; VP 9: Fernhill (FP367); VP 13: Hookwood (FP342); VP 14: FP339 north of Hookwood.	JLAs	Assessment of these locations is not included in the ES.	N/A	N/A	
9.3	Viewpoints	Locations from which existing infrastructure at Gatwick is visible and new development will be visible; VP 2: Sussex Border Path (FP362a) Footbridge rail crossing; VP 3: North Terminal Roundabout; VP 4: Sussex Border Path, A23; VP 5: Longbridge Roundabout; VP 6: Lowfield Heath Road; VP 7: Bonnetts Lane; VP 8: Poles Lane, bridleway; VP 11: East of Salfords PRoW; VP 16: FP 325 west of Gatwick; VP 17: Russ Hill PRoW.	JLAs	Preparation of a photomontage to inform an assessment of potential effects in the ES.	Photomontages have been prepared for all 32 representative viewpoints. See ES Chapter 8: Landscape, Townscape and Visual Resources which includes wireline photomontages to Landscape Institute Type 3 guidance (See ES Figures 8.9.1 to 8.9.128)	ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033] ES Chapter 8 Landscape, Townscape and Visual Resources Figures- Part 1, Part 2, and Part 3 [APP-060, APP-061 & APP-062]	
9.4	Viewpoints	The number of LVIA viewpoint locations seems on the low side for the scale and physical extent of development proposed. Taller elements of proposed infrastructure, in particular the CARE facility (but also new decked car parks, hotels and contractor compounds), are likely to be visible from a number of locations within the Surrey part of the study area. We recommend reviewing the scope for additional viewpoints within Surrey that fall within the Zone of Theoretical Visibility (ZTV).	JLAs	Field survey work has been undertaken to verify the potential for visibility within areas of the ZTV. Not every receptor will be represented by a viewpoint/photograph. Viewpoints have been chosen to ensure a broad coverage of the study area is obtained and all likely significant visual effects are assessed. Consultation and field surveys will continue throughout the preparation of the ES to identify further potential viewpoints.	Further candidate representative viewpoints were subsequently agreed through engagement with stakeholders, with a selection of those taken forward into the ES assessment. See ES Chapter 8: Landscape, Townscape and Visual Resources Figures 8.4.1, 8.4.2 and 8.4.4 for ZTV's and VP locations. Photomontages have been prepared for all 32 representative viewpoints. Wireline photomontages to Landscape	Paragraphs 8.4.5-8.4.7 of ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Institute Type 3 guidance (See ES Figures 8.9.1 to 8.9.128).		
9.5	Tranquillity Impact Assessment.	The methodology in Appendix 8.4.1 describes the process of obtaining baseline information relating to tranquillity, but does not provide criteria for magnitude of change or a description of the significance levels applied to judgements made in the LTVIA. We advise that this information should be added to the methodology to respond to statutory consultee concerns regarding the tranquillity methodology and to provide justification for identified effects.	JLAs	The PEIR considers effects on the perception of tranquillity based on the overall methodology for landscape, townscape and visual effects. A separate section of the methodology will be developed and applied within the LTVIA of the ES to address specific tranquillity issues.	ES Appendix 8.4.1: Landscape, Townscape and Visual Impact Assessment Methodology has been expanded to include definitions of tranquillity within sensitivity, magnitude and significance matrices to further support the assessment of effects within Section 8.9 and 8.11 of the ES.	Para 8.4.16 onwards of ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]	
9.6	High Weald AONB	The characteristics of 'High Weald' and 'High Weald Forests' which are partially within the High Weald AONB are briefly described. The assessment focuses on effects on district scale landscape character area which are shown on Figure 8.6.2. However the baseline character of relevant character areas within the High Weald AONB is not described and they are not assessed in later sections of the LTVIA. This should be explained.	JLAs	The LTVIA within the PEIR describes the special qualities and other qualities of the High Weald AONB at 8.6.16 to 8.6.22 and the objectives relevant to the designation. This forms the basis for the LTVIA. The Mid Sussex Landscape Character Assessment can also be referred to which covers the same area within the study area and describes very similar characteristics. This can support the LTVIA for the ES, although should avoid double counting of the same effects on the same area of landscape described in two different documents.	Landscape character areas with Mid Sussex District and the High Weald AONB and where they overlap have been described and considered within the ES and an assessment of effects on their character and/or special qualities, as appropriate in Section 8.9 of the ES.	Para 8.9.60 of ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]	
9.7	Landscape Mitigation	The aspiration of the NRP should be to improve landscape and visual impact of airport; it is considered that the current approach is not ambitious and seems to rely on tree planting to eventually screen the works. The design and layout need to be reconsidered to look at options to reduce the visual damage on nearby areas.	JLAs	Design development for proposed buildings and infrastructure will continue and will inform the LTVIA for the ES. Landscape mitigation proposals will form an important element within the Project. Landscape mitigation proposals will be developed to minimise and mitigate adverse effects of the Project. The Project design will seek to provide replacement landscape for any that is lost as a result of development.	The design of the projects set out in Volumes 2 to 4 of the Design and Access Statement (DAS) (APP-254, APP-255 and APP-256) are at an early feasibility stage. This is because they have been designed to test the viability of the masterplan but do not represent a fixed design of the future developments. The level of design development varies depending on the type of work; the highways, water and airfield designs required greater technical definition to respond to regulatory and stakeholder requirements and are therefore more developed within this DAS, while the buildings are at an earlier stage of design. This provides the necessary flexibility going forward so detailed design can best cater to the needs at that point in time or for a specific tenant or user group.	Section 8.8 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Volumes 1 to 5 of the Design and Access Statement [APP-253, APP-254, APP-255, APP-256 and APP-257]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					The DAS provides an overview of the masterplan to assist stakeholders and members of the public with understanding the key characteristics and proposed projects within each zone.		
9.8	Illustrative Material	There is a general lack of visual supporting information at this stage (e.g. elevational and axonometric drawings, wirelines and photomontages) for proposed buildings, infrastructure, highway works, vegetation removals, new planting and cumulative effects from nearby consented/proposed developments which makes it more difficult to assess the likely impacts of the project. We seek confirmation that photomontage (type 3/4) visualisations will be produced for the finalised LVIA.	JLAs	The PEIR incorporates appropriate photomontages of most representative viewpoint locations. All viewpoint locations will be developed as Type 3 or 4 photomontages for the ES based on Landscape Institute guidelines. Design development to inform environmental impact, LTVIA and mitigation/enhancement strategy.	The design of the projects set out in Volumes 2 to 4 of the Design and Access Statement (DAS) (APP-254, APP-255 and APP-256) are at an early feasibility stage. This is because they have been designed to test the viability of the masterplan but do not represent a fixed design of the future developments. Photomontages have been prepared for all 32 representative viewpoints to support the assessment of effects on landscape, townscape and visual receptors. See ES Chapter 8: Landscape, Townscape and Visual Resources which includes wireline photomontages to Landscape Institute Type 3 guidance (See ES Figures 8.9.1 to 8.9.128)	ES Chapter 8 Landscape, Townscape and Visual Resources Figures- Part 1, 2 and 3 [APP-060, APP-061 & APP-062] Volumes 1 to 5 of the Design and Access Statement [APP-253, APP-254, APP-255, APP-256 and APP-257]	
9.9	Visual Impact and Land / Water / Biodiversity	Draft Design and Access Statement, or at least the draft design principles for it;	JLAs	Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022. The final DAS has been submitted as part of the DCO Application and is available to view on PINS website. The design principles are contained in Appendix A1 to the DAS, comprising site-wide design principles, building specific design principles, drainage design principles and detailed landscaping principles.	N/A	Design and Access Statement , split across five volumes [APP-253 to APP-257]	
9.10	Visual Impact and Land / Water / Biodiversity	Options reporting and the assessment of alternatives reporting;	JLAs	An explanation of the assessment of alternatives was presented in the PEIR, in particular PEIR Chapter 3 on the Needs and Alternatives Considered. Subsequently, further explanation and updates on the alternatives assessment has been presented at Planning TWGs, e.g. 5th July 2022 meeting, and a focused consultation on	ES Chapter 3 Alternatives Considered sets out the options considered as part of the development of the masterplan with an assessment against policy contained within the Planning Statement.	ES Chapter 3: Alternatives Considered [APP-028], ES Alternatives Considered Figures [APP-049]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				highway improvements in Summer 2022 (see Section 2.2 of the Consultation Document explaining the optioneering and assessment process).		and ES Appendix 3.5.1: Options Appraisal Tables [APP-073] Planning Statement [APP-245]	
9.11	Visual Impact and Land / Water / Biodiversity	Parameter Plans (with illustration plans) on designs for the various Project buildings and infrastructure elements including lagoons, bridge widening, boundary fencing, bunds etc to inform consideration of the application and establishment of 'Requirements';	JLAs	<p>Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022.</p> <p>The Parameter Plans form part of the DCO Application and are available to view on PINS website. Supporting detail and illustrative drawings are contained in the DAS, which describes the development by zones (8 zones in total). DAS Volumes 2 to 4 contain the detailed proposals for each development zone.</p>	<p>Photomontages have been prepared for all 32 representative viewpoints to support the assessment of effects on landscape, townscape and visual receptors. See ES Chapter 8: Landscape, Townscape and Visual Resources which includes wireline photomontages to Landscape Institute Type 3 guidance (See ES Figures 8.9.1 to 8.9.128).</p> <p>Article 6 of the dDCO requires compliance with the Parameter Plans. Further Requirements 4 and 5 secure the detailed design in accordance with the design principles and the approved plans.</p>	<p>Design and Access Statement, split across five volumes [APP-253 to APP-257] and Parameter Plans [APP-019] ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Draft DCO [AS-005]</p>	
9.12	Visual Impact and Land / Water / Biodiversity	Vegetation retention and removal plans especially along the road corridors;	JLAs	<p>Illustrative landscape proposals are set out in ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan and is available to view on PINS website. Annex 4 of the oLEMP contains preliminary Tree Removal and Protection Plans for the surface access proposals, contained within Parts 3 and 4 of the oLEMP. In addition to this, Figures 1.2.1 to 1.2.15 of the oLEMP Part 1 contains illustrative landscape planting proposals for the surface access improvements at South Terminal roundabout, North Terminal roundabout and Longbridge roundabout, in addition to landscaping proposals for Museum Field and Car Park B.</p> <p>Additional supporting imagery of the landscaping proposals for the surface access proposals, including the relationship to the existing trees, is also contained in the Design and Access</p>	<p>Photomontages have been prepared for all 32 representative viewpoints to support the assessment of effects on landscape, townscape and visual receptors. Areas of vegetation to be removed are indicated on the photomontages, where relevant. See ES Chapter 8: Landscape, Townscape and Visual Resources which includes wireline photomontages to Landscape Institute Type 3 guidance (See ES Figures 8.9.1 to 8.9.128).</p>	<p>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 to APP-116] and Design and Access Statement Volume 3 [APP-255] ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				Statement Volume 3 (Section 5.8 on the Surface Access Corridor zone).			
9.13	Visual Impact and Land / Water / Biodiversity	Information regarding Construction Compounds & location of activities within them	JLAs	<p>The location and role of the construction compounds was presented to the LAs at the Surface Access TWG on 31st January 2023.</p> <p>Within the DCO Application, an explanation of the construction compounds is contained in paragraphs 5.3.84 to 5.3.111 of the ES Chapter 5: Project Description. This includes an overview of what each compound is expected to comprise. ES Figure 5.2.1f shows the location and extent of the proposed temporary construction compounds. The precise configuration of the compounds would be determined post consent.</p> <p>Further information on the use of the temporary construction compounds is provided in Section 7 of ES Appendix 5.3.1: Buildability Report Part A and summarised in Section 8 of the Design and Access Statement Volume 5.</p>	ES Chapter 8: Landscape, Townscape and Visual Resources includes wireline photomontages to Landscape Institute Type 3 guidance to illustrate key elements of the Project including maximum parameters of the temporary construction compounds (See ES Figures 8.9.1 to 8.9.128).	ES Chapter 5: Project Description [APP-030], ES Figure 5.2.1 [APP-053], ES Appendix 5.3.1: Buildability Report Part A [APP-079] and Design and Access Statement Volume 5 [APP-257]. ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	
9.14	Visual Impact and Land / Water / Biodiversity	Details of emerging strategies, needed so we can assess how they interrelate, for example the: Drainage Strategy, the Ground Noise Mitigation Strategy and the Landscape Strategy; Or how the Drainage Strategy interrelates with the detailed highway scheme; Or how the ASAS, the Parking Strategy and the highway schemes interrelate	JLAs	Section 1.3 of the ES Appendix 5.2.3: Mitigation Route Map provides an explanation and overview of the 'Control Documents' for the Project. The control documents comprise the strategies, plans and statements to manage the delivery and operation of the Project. Each Chapter of the ES has taken into account the relevant control documents, and which is set out in the section titled 'Mitigation and Enhancement Measures Adopted as Part of the Project' of each ES Chapter and discussed within the body of each chapter.	N/A	ES Appendix 5.2.3: Mitigation Route Map [APP-078]	
9.15	Visual Impact and Land / Water / Biodiversity	Information on Post implementation monitoring for drainage / Detailed drainage questions – some still outstanding?	JLAs	GAL already maintains systems to monitor water quality. GAL would continue to monitor the quality of water discharges in accordance with environmental permits, as set out in Table 11.8.1 of ES Chapter 11: Water Environment. Regular monitoring of any change to the channel bed and banks is proposed, in the vicinity of the River Mole, Museum Field and Car Park X post-	N/A	ES Chapter 11: Water Environment [APP-036], Design and Access Statement Volume 5 [APP-257] and the draft Development	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				<p>completion of the Project, which is also explained in Table 11.8.1 of ES Chapter 11: Water Environment.</p> <p>Requirements 10 and 11 of Schedule 2 to the draft DCO provide that no part of the authorised development (save for the identified exceptions) are to commence until written details of the surface and foul water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by the named relevant authority. Such drainage details submitted for approval are to be in general accordance with the drainage design principles included in Appendix 1 to the Design and Access Statement.</p>		Consent Order [APP-006]	
9.16	Visual Impact and Land / Water / Biodiversity	Evidence of Thames Water's response on the Waste Water Treatment works, and whether it has capacity for NRP and planned Local Plan growth;	JLAs	<p>An overview of engagement with Thames Water is contained in Tables 11.3.3 and 11.3.4 of ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036].</p> <p>ES Chapter 11 provides an assessment of impact of the potential increase in wastewater volumes as a result of the Project and is accompanied by ES Appendix 11.9.7: Wastewater Assessment (Doc Ref. 5.3) [APP-150], which provides the technical information to support the assessment. As explained in paragraph 0.1.3 of ES Appendix 11.9.7, the assessment demonstrates that with the provision of new infrastructure proposed as part of the Project, Gatwick Airport's network can safely cope with the additional wastewater flows. A response from Thames Water regarding the ability of their infrastructure to convey and treat the increased flows is awaited, but to date no indication of impediment has been received by GAL.</p> <p>As explained in paragraph 11.9.2 of ES Chapter 11: Water Environment, Thames Water will complete an assessment of the impact of an</p>	N/A	ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.7: Wastewater Assessment [APP-150]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				increase in passenger numbers as a result of the Project on water treatment capacity at Crawley and Horley Sewage Treatment Works (STW). GAL has engaged with Thames Water (including by providing ES Appendix 11.9.7: Wastewater Assessment (Doc Ref. 5.3)) to allow Thames Water to assess the impacts to the receiving STW in line with their statutory duties.			
9.17	Visual Impact and Land / Water / Biodiversity	Information on odour from new works at the STW;	JLAs	ES Chapter 13: Air Quality has undertaken a qualitative assessment of the effects and potential changes to odour as a result of the operational period of the Project. The assessment considers the risk of odour from airport operations (including water treatment works, CARE, aircraft emissions and additional use of fuel farms). Consideration has been paid to the proposed water treatment works and CARE facility and the likely odour effects. Further commentary on the assessment is contained in paragraphs 8.5.21 to 8.5.23 of the Planning Statement.	N/A	ES Chapter 13: Air Quality [APP-038] and Planning Statement [APP-245]	
9.18	Visual Impact and Land / Water / Biodiversity	Information on impact of increased passenger numbers on Sussex Ambulance Service and A&E;	JLAs	ES Chapter 18: Health and Wellbeing considers the impact of airport passengers on local healthcare capacity, including ambulance and A&E services, and is available to view on PINS website. The assessment considers the current level of demand (e.g. ambulance callouts from the airport) and the expected change due to the proposed uplift in passengers as well as visitors and workers. The assessment is contained in paragraphs 18.8.512 to 18.8.618 of ES Chapter 18.	N/A	ES Chapter 18: Health and Wellbeing [APP-043]	
9.19	Visual Impact and Land / Water / Biodiversity	Information on impact on Charlwood Park Farmhouse listed building to back up conclusions, and on potential improvements to setting of Edgeworth House and Wing House listed buildings;	JLAs	The approach and initial findings from the assessment of the Project's effects on the historic environment was discussed at the Land and Water TWG on 31st October 2022. In the DCO Application, ES Chapter 7: Historic Environment considers the potential effects of the Project on the historic environment resources. This includes an assessment of	N/A	ES Chapter 7: Historic Environment [APP-033]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				<p>Charlwood Park Farmhouse, Edgworth House and Wing House.</p> <p>The assessment demonstrates that there are no significant effects to Charlwood Park Farmhouse as a result of the Project. The Project does not propose improvements to the settings of Wing House and Edgworth House as both are located an area of surface car parks and modern buildings associated with the operational use of the airport, including the Marriott Hotel and are not significantly affected by the Project.</p>			
9.20	Visual Impact and Land / Water / Biodiversity	Lighting Strategy (e.g. particularly impact on Charlwood Park Farmhouse);	JLAs	<p>An Operational Lighting Framework has been submitted as part of the DCO Application in ES Appendix 5.2.2 (Doc Ref. 5.3) [APP-077] and sets out the framework for the use of external lighting for the operation of the Project. Construction period lighting requirements are defined within ES Appendix 5.3.2: Code of Construction Practice (CoCP) (Doc Ref. 5.3) [APP-082].</p> <p>ES Chapter 7: Historic Environment (Doc Ref. 5.1) [APP-033] takes account of both construction and operational lighting in considering the effects on the historic environment. In respect of Charlwood Park Farmhouse (Grade II* Listed), the "Zone of Theoretical Visibility" analysis shows no intervisibility between the Project and Charlwood Park Farmhouse. This has also been borne out by site visits and were presented at the Land & Water TWG on 31st October 2022.</p>	N/A	ES Appendix 5.2.2: Operational Lighting Framework [APP-077] and ES Appendix 5.3.2: Code of Construction Practice [APP-082]	
9.21	Visual Impact and Land / Water / Biodiversity	Draft Carbon Action Plan	JLAs	The Carbon Action Plan (CAP) has been submitted as part of the DCO Application and is available to view on PINS website. Compliance with the CAP is secured pursuant to Requirement 21 of Schedule 2 to the draft DCO.	N/A	ES Appendix 5.4.2: Carbon Action Plan [APP-091] and Requirement 21 of Schedule 2 to the draft DCO [APP-006]	
9.22	Land Use Masterplans	Land Use Masterplans - CBC remain concerned that these seem very 'high level' and lack detail.	CBC	N/A	The design of the projects set out in Volumes 2 to 4 of the Design and Access Statement	Volumes 1 to 5 of the Design and	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		While accepting this document is 'work in progress' GAL need to consider carefully the 'readability' of this document for key stakeholders and the general public as this is likely to be the main document read by many to understand the proposals. The challenge is for this to be sufficiently detailed to present a comprehensive overview of the development and its impacts during construction.			(DAS) (APP-254, APP-255 and APP-256) are at an early feasibility stage. This is because they have been designed to test the viability of the masterplan but do not represent a fixed design of the future developments. The level of design development varies depending on the type of work; the highways, water and airfield designs required greater technical definition to respond to regulatory and stakeholder requirements and are therefore more developed within this DAS, while the buildings are at an earlier stage of design. This provides the necessary flexibility going forward so detailed design can best cater to the needs at that point in time or for a specific tenant or user group. The DAS provides an overview of the masterplan to assist stakeholders and members of the public with understanding the key characteristics and proposed projects within each zone.	Access Statement [APP-253, APP-254, APP-255, APP-256 and APP-257]	
9.23	Masterplan works	Masterplan works – this drawing seems to just focus on the physical car parks and buildings when the development works (some of which are major and vital for the project) such as the widened runway itself, drainage works and associated earthworks are not referred to. The design of boundary treatments will also be critical in some locations, such as along the southern boundary This is currently an incomplete picture of the DCO project. The land use masterplan should be comprehensive and refer to all development.	CBC	N/A	The illustrative land use plan highlights the key developments that form part of the Project. Further details such as the proposed works to the runway and water management are set out in Section 5 of the DAS where the masterplan has been further described and illustrated within each zone. The role of the masterplan is set out in Section 5.1 of the DAS. Further, the Outline Landscape and Ecology Management Plan [APP-113 -116] sets out further detail regarding the proposed landscaping and ecology proposals that form part of the Project.	Section 5.1 of the Design and Access Statement [APP-254] ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-113-116]	
9.24	DAS Structure	DAS Structure - The concept of using a design guide to secure parameters for the development (building / car park elements) is understood. CBC would like comfort that the details and any parameter plans are sufficiently detailed to ensure control of the development over the plan period in line with the Rochdale Envelope requirements.	CBC	N/A	In undertaking the assessments as part of the ES, Rochdale Envelope requirements have been adhered to as set out in Chapter 6 of the ES. The Parameter Plans [APP-019] that form part of the DCO application are secured through Article 6 of the Draft DCO [AS-005] and will constrain future design development post-consent.	Paragraph 6.3.40 of ES Chapter 6 Approach to Environmental Assessment [APP-031]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Article 6 of the Draft DCO [AS-005]	
9.25	DAS Structure	DAS Structure - CBC would also wish to see detailed designs for key infrastructure, the implementation of which is fundamental to mitigation for some aspects of the development. Road design, drainage measures and engineering operations / landscaping need to be understood in 2 detail as part of the DCO consideration. These elements should not be left as design matters for later in the process.	CBC	N/A	The designs of highways are described in Section 5.8 Surface Access Corridors within the DAS. The series of plans titled Surface Access Highways Plans include general arrangements, engineering and structures plans for the surface access proposals. These works will be further developed post-consent in line with the processes set out in the Schedule 2 Requirements of the Draft DCO [AS-005].	Section 5.8 of the Design and Access Statement [APP-255] Schedule 2 of the Draft DCO [AS-005]	
9.26	DAS Structure	DAS Structure - The design images in the emerging document appear rather uninspired and 'dull'. While CBC accept there needs to a functional aspect to every building, this project should be an opportunity to push for high quality design (as required through the NPPF) and for GAL to set ambitious design codes for its property portfolio.	CBC	N/A	The Design Guide and Design Principles set out in Volume 5 of the DAS provide further details that will influence the final design of the buildings this includes ensuring that the design is of a high quality. GAL welcomes further discussions to understand CBC's views on the Design Guide and Design Principles.	Volume 5 of the Design and Access Statement [APP-256]	
9.27	DAS Structure	DAS Structure - Where plots (such as hotels) may be released to others to implement, CBC would wish to understand how, though the DCO process GAL intend to ensure control of the development and design aspirations it sets out in its design code.	CBC	N/A	As the undertaker GAL is responsible for compliance with the DCO, however GAL will likely rely on contractors, sub-contractors to deliver the works themselves. The detail of such arrangements will be agreed with any relevant party to reflect the necessary circumstances. This cannot, however, absolve GAL from liability under the DCO. Articles 7 and 8 of the Draft DCO provide for where benefit of the order is to be transferred to another party. Should GAL choose to transfer the benefit of the order for another party to allow for implementation, the same restrictions, liabilities and obligations would apply. This includes following the procedures for design approval as set out in the Schedule 2 Requirements.	Articles 7 and 8 of the Draft DCO [AS-005]	
9.28	Zones	Zones - CBC note that these slides lack detail and that as the work progresses it is vital that this is expanded upon as part of the submission. Given the duration of the construction project, CBC agree with WSCC that the level of detail for	CBC	N/A	Details of the construction compounds are set out in Section 8 of the DAS. This section describes the indicative locations, activities, sizing, maximum heights and access for each of the proposed compounds. Further	Section 8 of the Design and Access Statement [APP-256] and ES Appendix 5.3.2	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		the construction compounds needs to a similar level of detail as the permanent structures.			measures will be adopted as set out in the Code of Construction Practice (as secured by Requirement 7 of the draft DCO) to minimise impacts during construction.	Code of Construction Practice [APP-082].	
9.29	LTVIA	Given GAL's confirmation that the change in runway utilisation to exceed 55 movements per hour means the WIZAD route will be used more frequently, any impact of increase overflight will need to be assessed as part of the Landscape Townscape and Visual Impact Assessment (LTVIA)	HDC	N/A	The effects of aviation activity are considered within a 5 km radius study area in Sections 8.9 and 8.11 of ES Chapter 8: Landscape, Townscape and Visual Resources (Doc Ref. 5.1) and effects on tranquillity within nationally designated landscapes within a wider study area for overflying aircraft < 7,000 feet. The extent of the tranquillity study area has been determined through an appropriate methodology which applies the criteria in CAP1616 Appendix B to consider overflights from aircraft at up to 7,000 ft above local ground level.	Sections 8.9 and 8.11 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	
9.30	Existing open space receptors mitigation	What will impact of aircraft be on tranquillity on Land North of Horsham and West of Ifield sites and other existing public open spaces in the District? Have these been identified as receptors and has mitigation been proposed?	HDC	N/A	The ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] includes an assessment of effects on the perception of tranquillity within nationally designated landscapes within a 35 mile radius of Gatwick. The increase in overflying aircraft at less than 7000 ft above local ground level would range from 6% to 20% which is considered to result in minor adverse effects (see Table 8.8.1).	Sections 8.9 and 8.11 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] and Table 8.8.1	
9.31	Viewpoints	The viewpoints/photomontages and illustrative material are important for assessing the impact of parts of the NRP upon Mole Valley residents, some of which live only several hundred metres from key parts of the project. The most likely parts of the NRP to visually impact Mole Valley residents are: the decked car parking buildings, Central Area Recycling Enclosure (CARE) building (option 1, GAL's preferred option in light of consultation feedback) and new North Terminal buildings. MVDC are still seeking confirmation as to whether a candidate view point over Charlwood has been determined as a result of the submitted proposals of the DCO and that any additional field surveys etc. have been carried out.	MVDC	N/A	Representative viewpoints at 32 locations have informed the landscape, townscape and visual impact assessment. Two viewpoints in the vicinity of Charlwood are included. Wireline photomontages to LI Type 3 guidance have been prepared for all representative viewpoints (See ES Figures 8.9.1 to 8.9.128 [APP-117]).	ES Figures 8.9.1 to 8.9.128 [APP-117]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
9.32	Surrey Hills	Clarification sought that Surrey Hills is covered in the tranquillity assessment and that sufficient account has been had of the proposed amendments to the boundaries of the AONB as published in early 2023. The LVIA should have regard to this	MVDC	N/A	Table 8.8.1 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] identifies the increase in overflights within the Surrey Hills AONB to be around one flight a day which is considered to result in no more than a minor adverse level of effect (see Section 8.9). Following contact with the Surrey Hills AONB unit regarding the progress of the boundary review process they confirmed that the evidence gathering in 2022 was complete and Natural England consultants are considering Evaluation Areas and Candidate Areas. Natural England will then launch the statutory and public consultation on the proposed extensions which is expected to run in 2023. Therefore no further assessment of predicted effects on the landscape, views or perception of tranquillity on the basis of land that may or may not be included in the AONB has been undertaken.	Table 8.8.1 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	
9.33	LVIA	There is no aspiration or commitment in the PEIR to improve the declining visual landscape caused by the airport activity already in existence. Furthermore, the indicative design, scale, and siting of the proposed development would further damage the landscape. There is concern about the lack of imagination in terms of mitigation and enhancement, as it is only proposed to plant limited areas with vegetation and there will be no landscaping to screen development in the short term	WSCC	N/A	Maximum parameter models have been assessed for elements within the Project (where necessary) and form an appropriate level of detail required for a DCO application (see Table 8.7.1). A greater level of detail is provided for the surface access improvements, in accordance with DMRB, including detailed drawings in ES Appendix 5.2.1: Surface Access General Arrangement Plans: [APP-020] and illustrative landscape planting proposals in ES Appendix 8.8.1: Outline LEMP [APP-113]. A Design and Access Statement (DAS) [APP-253 to 256] has been prepared to provide design quality control without being too restrictive for future design stages (the DAS is a separate DCO application document). Reinstatement of vegetation has formed an important mitigation measure for the Project. Landscape proposals and typical planting schedules and management objectives are included in the oLEMP. A detailed scheme of planting proposals does not form part of the	Table 8.7.1 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] ES Appendix 8.8.1: Outline LEMP [APP-113]. A Design and Access Statement [APP-253 to APP-256]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					DCO however, the details of the landscape planting proposals will be agreed in consultation with the relevant authorities should the DCO be granted and will be secured as a DCO requirement in Schedule 2.		
9.34	LVIA	PINs question (I.D 4.2.10) - If a visible plume is produced it should be assessed and if a RVAA is undertaken it should be included in the LVIA. GAL state that 'Due to the limited intervisibility of visual receptors within the study area and the very limited number of likely significant effects, there is no requirement for an RVAA. The potential for a visible plume at the CARE facility will be considered during the EIA process and reported, if required, in the ES'. How have visible plumes be ruled out if the assessment hasn't been undertaken yet? Further justification for no RVAA should be included in the ES	WSCC	N/A	Significant adverse effects on occupiers of residential properties would trigger the need for a RVAA. No significant long term effects are identified (See ES Chapter 8: Landscape, Townscape and Visual Resources (APP-033 Section 8.9). The potential for a visible plume at the CARE facility has been assessed. A maximum of 5 hours of visible plume are predicted annually and it is anticipated that there would be no visible plume greater than 20 metres in length at any time of year or during any atmospheric conditions. No significant adverse effects are predicted.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Section 8.9	
9.35	LVIA Methodology	The listed topic areas raised during consultation do not include the queries raised by WSCC with regards LVIA methodology (basis for ZTV production) and how viewpoints were identified	WSCC	N/A	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] includes Appendix 8.4.1: Landscape, Townscape and Visual Impact Assessment Methodology. The methodology is based on recommendations within IEMA and Landscape Institute Guidelines for Landscape and Visual Impact Assessment V3.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Section 8.9	
9.36	LVIA	It is not clear how the early LVIA work fed into the site selection process for the proposed development. How has LVIA work helped guide the location for the construction compounds? The need for a surface access contractor compound on greenfield land north of the A23 Spur is questioned, when the airport has significant brownfield land and existing hard standing available that could be utilised without the environmental damage and disruption this site would cause to nearby residents	WSCC	N/A	The full range of environmental topics were considered in the siting of all elements of the Project. ES Chapter 3 Alternatives Considered (APP-028) describes the site selection process for the compounds. The LTVIA process has not identified significant adverse effects as a result of the location of the temporary contractors compound at South Terminal.	ES Chapter 3 Alternatives Considered [APP-028]	
9.37	Landscape planting proposals	There is a strong reliance throughout the PEIR that the maturity of planting will be used to mitigate impacts, although the 'Landscape Design Year' is 2038, there are significant	WSCC	N/A	The LTVIA assesses effects on landscape, townscape and visual resources during construction, when development is complete and at year 15 when mitigation planting	ES Chapter 8: Landscape, Townscape and Visual Resources	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		elements of the project where landscape planting proposals will be immature, not just visually, but in ecosystem service provision too. WSCC requests GAL review and present opportunities for substantial advance planting			would be established and mature. Advance planting will be considered, where appropriate and practicable.	[APP-033] Section 8.9	
9.38	Photomontages	WSCC expects all viewpoints to have photomontages and to be assessed in summer, winter and during the night-time periods.	WSCC	N/A	All representative viewpoints within ES Chapter 8: Landscape, Townscape and Visual Resources (Doc Ref. 5.1) include wireline photomontages to LI Type 3 guidance (See ES Figures 8.9.1 to 8.9.128 (Doc Ref. 5.2). Effects on landscape, townscape and visual resources are assessed during the daytime and at night, in the summer and winter.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]. ES Figures 8.9.1 to 8.9.128 (Doc Ref. 5.2)	
9.39	Gatwick Stream Flood compensation area	The assessment does not address the visual impact of the 18,000 m2 Gatwick Stream Flood compensation area, which appears to excavate the ground level by 3m. Such works would have impacts during construction and on landscaping from these fields, although reference to walkers is made in 8.9.184. The report does not describe the impacts on landscape or nearby sensitive uses for the Peeks Brook Lane road widening, that includes an increase in the height of the bridge. The visual impacts of the junction works for both Terminals need to be fully outlined.	WSCC	N/A	The compensation area has been removed since the PEIR and does not feature as part of the design nor assessed as part of the ES.	N/A	
9.40	Design of proposals	It is noted that the PEIR states that the new office configuration, phasing, and floorspace is dependent on the timing of requirements, whereas the timing of the additional hotel rooms would be dependent on commercial need. GAL should clarify why these developments are needed to facilitate the airport expansion and how they are directly linked to it. Assessment of Alternatives - Since the development of the proposals, there have been limited opportunities for stakeholders to influence the design, prior to the PEIR being published. The County Council wants to see further mechanisms to allow the proposals to be understood and scrutinised prior to the DCO application being submitted. Although it is understood that operational and safety considerations are important aspects of design,	WSCC	N/A	The proposals have been subject to consultation as part of the two consultations. Feedback from the consultations and how this has been responded to by GAL is set out in the Consultation Report [APP-218]. ES Chapter 3 Alternatives Considered [APP-028] sets out the options considered for the development of the office and hotel facilities as well as the criteria that was assessed as part of optioneering exercises.	Consultation Report [APP-218] Section 3.6 of ES Chapter 3 Alternatives Considered [APP-028]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		the PEIR lacks detail on how environmental and social criteria have influenced the decision-making process					
9.41	Environmental and social effects	WSCC wants to see a stronger statement that environmental and social effects have been a key factor in the site selection process associated with airport infrastructure.	WSCC	N/A	Table 3.4.1 of ES Chapter 3 Alternatives Considered [APP-028] sets out the assessment criteria that has been applied to the design of the masterplan. This includes Environment and Community criteria.	Table 3.4.1 of ES Chapter 3 Alternatives Considered [APP-028]	
9.42	Assessment Criteria	WSCC understand that safety and operational factors are a driving element of airport facilities, we would expect to see clear evidence of how constraints mapping of ecological/environmental information has fed into the assessment process to choose the most favourable site. How have these criteria been weighted? How have the criteria been chosen? Reference is made to landscape character, but little about visual impact to receptors, including local communities	WSCC	N/A	Table 3.4.1 of ES Chapter 3 Alternatives Considered [APP-028] sets out the assessment criteria that has been applied to the design of the masterplan. This includes Environment and Community criteria. ES Appendix 3.5.1 Options Appraisals Tables [APP-073] sets out the scoring that was attributed to the various options including qualitative descriptions. The Environmental criteria includes impacts on both landscape and visual receptors, with the Community criteria assessing noise, air quality, health, and socio-economics.	Table 3.4.1 of ES Chapter 3 Alternatives Considered [APP-028] ES Appendix 3.5.1 Options Appraisals Tables [APP-073]	
9.43	PIER boundary	This chapter should outline the justification for the PEIR boundary presented, with the recognition that it is very tightly drawn around the airport boundary. Can this be further detailed within the ES, taking account of any additional required mitigation	WSCC	N/A	The land subject to the application for development consent extends to approximately 735 hectares. The Project site boundary is shown on ES Figure 5.2.1 (APP-053). Following the consultations in 2021 and 2022, this area has been reduced in size from approximately 820 hectares (in the 2021 consultation) as some areas are no longer considered required for the Project. Areas removed from the Project site boundary include third party land west of Museum Field and on the periphery of the airport and also areas of woodlands and ecological sites including: areas of Ancient Woodland (Brockley, Pickets and Horleyland Woods); <ul style="list-style-type: none"> • other parcels and stretches of woodland in the area east of the railway line and along the southern boundary; and • large parts of GAL's two biodiversity action plan areas along the River 	ES Figure 5.2.1 [APP-053] Consultation Report [APP – 218]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>Mole Corridor and to the south east of the airport, where these are not required for the Project.</p> <p>Further detail about changes to the Project that have been made following consultation and engagement with the public and stakeholders is set out within the technical chapters and the Consultation Report [APP-218]</p>		
9.44	Evidence base	There is a general lack of evidence around scoring and narrative of risks associated with each option. The Appendix does not give enough evidence, with nearly all stating: 'options would reduce land take and avoid the removal of habitats where possible'	WSCC	N/A	ES Appendix 3.5.1 Options Appraisals Tables [APP-073] sets out the scoring that was attributed to the various options including qualitative descriptions which provides further detail including whether land take is required.	ES Appendix 3.5.1 Options Appraisals Tables [APP-073]	
9.45	Surrey Hills AONB	Tracker does not appear to have picked up or addressed that we commented on the Surrey Hills AONB undertaking a review of its boundary at that time. The relevant chapter also made no reference to Tandridge.	TDC	N/A	Following contact with the Surrey Hills AONB unit regarding the progress of the boundary review process they confirmed that the evidence gathering in 2022 was complete and Natural England consultants are considering Evaluation Areas and Candidate Areas. Natural England will then launch the statutory and public consultation on the proposed extensions which is expected to run in 2023. Therefore, no further assessment of predicted effects on the landscape, views or perception of tranquillity on the basis of land that may or may not be included in the AONB has been undertaken. The chapter takes into account relevant local plan policies and landscape character areas including those of Tandridge District Council.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	
9.46	Longbridge roundabout	Candidate viewpoint 5b (Longbridge roundabout) Is this the best location/orientation to capture the extent of vegetation removal/other proposed scheme changes in this area. Has eastern side of roundabout looking north-west been considered?	SCC	N/A	Viewpoints 20 and 21 within the ES are located at Longbridge Roundabout. ES Figure 8.4.24 and 8.4.25 [APP-060]. One is from the side of the road and the other is from Church Meadows open space. Panoramic photography and photomontage wirelines are including to provide an accurate representation of the location and context.	ES Figure 8.4.24 and 8.4.25 [APP-060]	
9.47	Viewpoint	Seek confirmation that following scheme changes, additional field surveys etc that there is	SCC	N/A	Further candidate representative viewpoints have been agreed through subsequent	ES Chapter 8: Landscape,	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		still no candidate viewpoint over Charwood/Charwood village edge?			engagement with stakeholders. A selection of these have been taken forward through the assessment within the ES (see Section 8.9). Viewpoints with no intervisibility have been identified in ES Appendix 8.6.2 [APP-111] for reference. No visibility from within Charwood or immediately on the edge of the settlement was identified. Two locations (Viewpoint 14 and 24) north east of the village are included in the ES.	Townscape and Visual Resources [APP-033] ES Appendix 8.6.2 Additional Candidate Viewpoint Photography [APP-111]	
9.48	Photographs/Visualisations	Is it proposed to provide additional photography/visualisations to cover different angles of view eg VP2	SCC	N/A	One view from the roof of the Short Stay Multi-Storey Car Park 3 is included in the ES.	ES Figures 8.9.1 to 8.9.128 [APP-061]	
9.49	Winter photography	Request for winter photography to be included	SCC	N/A	Winter photography is included for all viewpoints including wireline photomontages to LI Type 3 guidance (See ES Figures 8.9.1 to 8.9.128 [APP-061])	ES Figures 8.9.1 to 8.9.128 [APP-061]	
9.50	Surrey Hills	Clarification sought that Surrey Hills is covered in the tranquillity assessment	SCC	N/A	Four nationally designated landscapes are included in the assessment of effects on the perception of tranquillity as a result of overflying aircraft. Table 8.8.1 in ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] identifies the increase in overflights within the Surrey Hills AONB to be around one flight a day, which is considered to be a negligible magnitude of change in the perception of tranquillity.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Table 8.8.1	
9.51	Photomontages	Request for photomontages to cover the construction period, given that this will be a lengthy period. This particularly applies to the construction compounds and elements such as the tall batching plants	SCC	N/A	Maximum parameters for temporary construction compounds are included in wireline photomontages to LI Type 3 guidance (See ES Figures 8.9.1 to 8.9.128 [APP-061]).	ES Figures 8.9.1 to 8.9.128 [APP-061]	
9.52	Visualisation type	Query around visualisation type to be used. SCC of the view that type 4 would be appropriate for this scale of scheme. If level 3 to be used, justification for this approach should be provided	SCC	N/A	Wireline photomontages to LI Type 3 guidance (See ES Figures 8.9.1 to 8.9.128 [APP-061]). These show maximum parameters for all key elements of the project and temporary construction compounds. A methodology for the preparation of the visualisations is included in Appendix 8.4.1: Landscape, Townscape and Visual Impact Assessment Methodology. Appropriate data and information has been used to support the creation of accurate photomontages.	ES Figures 8.9.1 to 8.9.128 [APP-061]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
9.53	LVIA	LVIA should also take into account potential changes to the Surrey Hills AONB boundary which will shortly be the subject of statutory public consultation	SCC	N/A	Following contact with the Surrey Hills AONB unit regarding the progress of the boundary review process they confirmed that the evidence gathering in 2022 was complete and Natural England consultants are considering Evaluation Areas and Candidate Areas. Natural England will then launch the statutory and public consultation on the proposed extensions which is expected to run in 2023. No further assessment of predicted effects on the landscape, views or perception of tranquillity on the basis of land that may or may not be included in the AONB has been undertaken.		
9.54	ZTV	The revised ZTV shows areas where existing and proposed elements of the airport are visible, beyond the core 5km study area. As per the process for assessing the effect on the long-distance Leith Hill viewpoint, the LVIA should include commentary on potential effects on other promoted viewpoints within the Surrey Hills AONB. For example, the airport is definitely visible from Box Hill. I am not advocating the need for additional photo viewpoints, rather the use of the Leith Hill viewpoint to illustrate potentially similar effects at other AONB viewpoints a similar distance from the airport.	SCC	N/A	Agreed. The Viewpoint at Leith Hill has been included in the ES to demonstrate the nature of views from distant areas of high land. Whilst Gatwick Airport is visible in views, it forms a very minor element in the view and is not immediately apparent. Effects on visual amenity or the perception of tranquillity as a result of the Project are considered to be negligible or minor adverse.	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Section 8.9. ES Figures 8.9.1 to 8.9.128 [APP-061]	
9.55	Integration car park B	Clarity sought on proposed integration of Car Park B into Riverside Gardens and if acceptable to RBBC Green Spaces and Property Services. Have not seen Landscape Integration Plan	RBBC	N/A	The Outline Landscape and Ecology Management Plan illustrates the proposals to integrate the proposed replacement open space (at the current Car Park B location) into Riverside Gardens. Figure 1.2.2 of the Outline LEMP shows a concept sketch of Car Park B. GAL welcomes RBBC's Green Spaces and Property Services comments on the concept design.	Figure 1.2.2. of the Outline LEMP [APP-113]	

Table 10: Water Environment

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
10.1	Water Quality	Provision of details of the future de-icing strategy	JLAs	Greater detail provided as part of the ES.	Details of the de-icer are set out in ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment (APP-145).	ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145]	
10.2	Water Quality	Methods for cleaning surface water before being released into the wider environment lacks detail with references to best practice	JLAs	Additional information provided in the ES. Potentially contaminated runoff will be treated prior to discharge offsite following CIRIA best practice	The project includes a new treatment facility to the east of the airport that address the potential for an increase in de-icer contaminated runoff due to the Project. The treatment facility will receive flow from the long term-storage lagoons (LTSL) and treat the potentially contaminated runoff prior to discharge to the Gatwick Stream, ensuring no significant environmental impact to the watercourse. This will increase the volume of storage available in the LTSL reducing the risk of contamination to receiving watercourses.	Section 11.7 and Table 11.8.1 of ES Chapter 11: Water Environment [APP-036]	
10.3	Hydrogeology	Impact on groundwater movements	JLAs	Assessment methodology included in the ES. ES assessment has been informed by a ground investigation currently being progressed	The ground investigation was completed in early 2023 and the findings informed the assessment of groundwater impacts reported in the ES, which concluded that the Project would not give rise to any significant effects.	Appendix 11.9.5: Groundwater Assessment [APP-146] Paragraphs 11.9.30-11.9.34 of ES Chapter 11 Water Environment [APP-036]	
10.4	Flood Risk	Impact on hydrology of land raising at pentagon field	JLAs	The deposition of spoil will not alter the existing runoff hydrology.	N/A	Para 11.7.11 of ES Chapter 11: Water Environment [APP-036]	
10.5	Flood Risk	Increase in impermeable area	JLAs	The Project includes additional attenuation storage within the airfield and highways drainage network to ensure no increase in offsite flood risk as demonstrated in the ES.	N/A	ES Appendix 11.9.6: Flood Risk Assessment [APP-147].	
10.6	Flood Risk	Further attempts should be made to de-risk the essential infrastructure in the submitted version of the DCO application. At present it doesn't seem to go far enough.	JLAs	GAL is developing a Flood Threat Plan as referenced in the PEIR that ensures the safety of passengers and operatives during a flood event	The Flood Resilience Statement is included as Annex 6 of the Flood Risk Assessment that demonstrates how Gatwick would safely manage residual flood risk.	ES Appendix 11.9.6 Flood Risk Assessment – Annex 6 Flood Resilience Statement [APP-147]	
10.7	Flood Risk	Clarity is needed as to how this water (draining towards the northern boundary) would be	JLAs	As stated in the ES FRA, runoff will continue to drain to existing ponds augmented by additional	N/A	Paragraphs 5.3.1 and 7.3.1 of ES Appendix 11.9.6: Flood Risk	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		collected and the rate it would be released to the Gatwick Stream		below-ground attenuation storage across the airfield to ensure no increase to flood risk.		Assessment [APP-147]	
10.8	Flood Risk	Although the hydrology model has taken into account the Upper Mole Flood Alleviation Scheme, this only takes account of 1 in 100 year events and is likely to be overwhelmed when summer 2021 European type events repeat themselves in the coming years	JLAs	The surface water drainage and fluvial mitigation strategies both include allowances for the predicted impact of climate change as required by the NPS and NPPF based on CP09 and CP18 respectively as translated into guidance by the Environment Agency. Additionally, as the Project is classified as a Nationally Significant Infrastructure Project (NSIP), an assessment of the Credible Maximum Scenario was undertaken.	An assessment of the effects of the Project on flood risk are reported in the flood risk assessment. While the Project would slightly increase in risk of flooding within the airport, there would be no increase in flood risk to other parties. The safety of passengers and staff due to the residual risk of flooding on the airport is addressed via the Flood Resilience Statement.	Paragraphs 3.7.4 to 3.7.11 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Annex 6 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.9	Flood Risk	In the event of extreme flooding events how would the airport, road and rail infrastructure be able to cope with a flooded site	JLAs	GAL has developed a Flood Threat Plan as referenced in the ES that ensures the safety of passengers and operatives during a flood event	The Flood Resilience Statement is included as Annex 6 of the Flood Risk Assessment that demonstrates how Gatwick would safely manage residual flood risk.	Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.10	Flood Risk	How much additional capacity is actually being provided within the perimeter, how much additional capacity is being provided outside the airport perimeter but within the project redline	JLAs	Approximately modelled volumes stored within the fluvial and surface water mitigation strategy: Museum Field FCA = 30,000m ³ ; Car park X FCA = 41,000m ³ ; Car Park Y tank = 32,000m ³ ; Airfield drainage storage = 9,000m ³	N/A	Modelled storage volumes are set out in Table 7.2.1 and Table 7.3.1 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Paras 7.3.3 onwards sets out additional storage at Car Park Y and airfield.	
10.11	Flood Risk	The proposed works will increase the flood risk particularly along the Gatwick stream and River Mole until the mitigation measures are in place which appear in the case of the Gatwick Stream in Riverside Gardens Park – very late in the project timescales	JLAs	The proposed scheme will not increase flood risk off-site as demonstrated in the ES FRA. The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency.	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Construction sequencing of the mitigation strategy are set out in Table 7.5.1 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Draft DCO Schedule 2 [AS-004]	
10.12	Flood Risk	The proposed works will increase the flood risk particularly along the Gatwick stream and River Mole until the mitigation measures are in place which appear in the case of the Gatwick	JLAs	The proposed scheme will not increase flood risk off-site as demonstrated in the FRA. The floodplain compensation areas proposed as mitigation for loss of floodplain will be	Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		Stream in Riverside Gardens Park – very late in the project timescales		constructed before any loss of respective floodplain due to the proposed scheme	by the relevant planning authority in consultation with the Environment Agency.	Assessment [APP-147] Construction sequencing of the mitigation strategy are set out in Table 7.5.1 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Draft DCO Schedule 2 [APP-006]	
10.13	Flood Risk	Major road works and flood alleviation measures should be completed before the runway is fully operational	JLAs	The floodplain compensation areas will be constructed before any loss of respective floodplain due to the proposed scheme	Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency. The plan will set out the timing of the proposed FCAs in relation to the construction of Project works that encroach onto the floodplain, to ensure no increase in fluvial flood risk to other parties.	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.14	Wastewater	The NRP should be carefully planned to ensure that it does not prejudice the expansion of Crawley WwTW	JLAs	Discussions with Thames Water are ongoing. No impediment has been raised by TW to date	N/A	Para 5.3.2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] and Para 8.1.5 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	
10.15	Wastewater	There is a potential impact on the wastewater system arising from increased flows in the network exceeding the available capacity	JLAs	Hydraulic modelling demonstrates that the proposed infrastructure is of sufficient capacity for the projected flows.	N/A	Section 8.3 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	
10.16	Wastewater	Which areas of the wastewater network would need to be improved without a new pumping station east of the Brighton-London mainline and when would the new pumping station be needed	JLAs	The assessment of effects on the Thames Water network and wastewater treatment works is ongoing. The pumping station east of the Brighton-London mainline is dependent on ongoing discussions with Thames Water and the impact of the NRP on Crawley and Horley WwTW.	N/A	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	
10.17	Water Supply	More ambitious water efficiency measures, including retrofitting of existing buildings are required	JLAs	The ES demonstrates that the additional requirements for water usage can be met by SESW's network and sources - who will also be undertaking their own impact assessment.	Separately to the NRP Gatwick will deliver water efficiency measures as part of their Second Decade of Change that will reduce water use at the airport by 50% by 2030 (compared to 2019).	Paragraphs 11.4.11 and 11.9.69 of ES Chapter 11 Water Environment [APP-036]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>The Water Management Plan sets out the approach to managing the impacts of construction on the water environment.</p> <p>Requirements 10 and 11 of the draft DCO require approval from the lead local flood authority and highways authority respectively to the detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix A1 of the Design and Access Statement.</p>	<p>ES Appendix 5.3.2 Code of Construction Practice Annex 1 - Water Management Plan [APP-083]</p> <p>Draft DCO Schedule 2 [APP-006]</p> <p>Design and Access Statement Volume 5, Appendix 1 [APP-259]</p>	
10.18	Water Supply	The Water Supply Assessment does not extend to the full operational water need in 2047 when a potential 80.2 million passengers	JLAs	The assessment has been updated to inform the ES and assess up to the year 2047.	N/A	Section 4 of ES Appendix 11.9.8 Water Supply Assessment [APP-151]	
10.19	Water Supply	What effect the recent position statement from Natural England, requiring planning permission applications in the majority of Crawley and northwest Sussex to demonstrate that they do not increase pressure on water resources	JLAs	The ES demonstrates that the additional requirements for water usage can be met by SESW's network and sources, and any new statements/policies will be taken into account.	N/A	Paragraphs 11.4.11 and 11.9.69 of ES Chapter 11 Water Environment [APP-036]	
10.20	Water (All)	When will a maintenance programme of the water infrastructure be made available along with effective monitoring reporting	JLAs	Initial assessment of maintenance requirements is included in the ES.	N/A	Table 11.8.1 of ES Chapter 11: Water Environment [APP-036]	
10.21	Water Quality	It is not clear how the impacts of the proposed development on the water quality of the River Mole will be mitigated. Within the PEIR it states that the future de-icing strategy (for increased air traffic movements) has not been developed at this stage. It is therefore difficult to understand how the PEIR concludes that any impact on water quality would be negligible.	JLAs	The ES and supporting water quality impact assessment has provided additional information. Mitigation measures will be incorporated into the scheme to ensure no deterioration in existing water quality.	The project includes a new treatment facility to the east of the airport that address the potential for an increase in de-icer contaminated runoff due to the Project. The treatment facility will receive flow from the long term-storage lagoons (LTSL) and treat the potentially contaminated runoff prior to discharge to the Gatwick Stream, ensuring no significant environmental impact to the watercourse. This will increase the volume of storage available in the LTSL reducing the risk of contamination to receiving watercourses.	<p>Section 11.7 and Table 11.8.1 of ES Chapter 11: Water Environment [APP-036]</p> <p>ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145]</p>	
10.22	Groundwater	It is not clear from the PEIR and its appendices, if alterations to the land surface heights proposed by the DCO and the changes these would have to groundwater movements have been fully integrated into the hydrology model. Similarly has the land raising at Pentagon Field, where large volumes of spoil is going to be deposited, been taken into account at the different stages in the project?	JLAs	ES Chapter 11 and Chapter 10 consider the potential changes on groundwater from the proposed DCO works. A ground investigation was undertaken to inform the groundwater impacts assessment. Additional GI will be undertaken at the detailed design period to further inform the design considerations to ensure both ground and groundwater conditions are taken into account.	N/A	<p>Table 11.8.1 of ES Chapter 11 Water Environment [APP-036]</p> <p>Para 11.7.11 of ES Chapter 11 Water Environment [APP-036]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				Existing catchment boundaries in Pentagon Field will not be changed due to the deposition of spoil.			
10.23	Flood Risk	Whilst chapter 11 and associated appendices appear very confident in coping and mitigating for flooding, there have been serious historic flooding incidents at the airport. From the written text provided it is unclear at what point the flood alleviation ponds could overflow, i.e. their capacity, and under what circumstances. Sharing different scenarios and outputs in the main document would be helpful as at present it is difficult to assess. A related concern is the adequacy of the capacity of the proposed and remaining existing flood alleviation measures to absorb more surface water as a result of more hard landscaping. It is not clear whether this will result in faster flows to the local fluvial network including the River Mole and Gatwick Stream at times when they would already be at capacity or in a state of flood. It is not very clear in the evidence provided the wider effects of the hard surfacing on the fluvial network. It is considered that further attempts should be made to de-risk the essential infrastructure in the submitted version of the DCO application. At present it doesn't seem to go far enough.	JLAs	The ES FRA demonstrates that there will be no increased risk of flooding off site as a result of the NRP. Any residual flood risk on-site will be safely managed via the Flood Threat Plan developed by GAL as it is now.	The Flood Resilience Statement is included as Annex 6 of the Flood Risk Assessment that demonstrates how Gatwick would safely manage residual flood risk.	Section 6.2 and Annex 6 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.24	Flood Risk	The second pond option adjacent to Longbridge Roundabout is further north in Church Meadows. This is in an Area of High Archaeological Potential. The site is currently open and there are likely to be impacts on local ecology. Should both proposed locations be found inappropriate, it is unclear what further options could be brought forward and how they would be scrutinized as part of the DCO process prior to submission to the Planning Inspectorate. At present two options are being proposed for Longbridge Roundabout. We are aware that more southerly site is already very waterlogged for much of the year and question whether this would be appropriate for a pond that was meant to be alleviating flooding.	JLAs	The location of the highways attenuation pond has been informed by the fluvial flood risk modelling for the project and consequently they have been located outside the floodplain. The pond is not located within the AHAP. The ponds and associated landscaping would be designed to mitigate any ecological effects, and result in enhancement.	The surface access improvements highways drainage design now includes one pond at Church Meadows to the north of Longridge on the western side of the River Mole. This is located outside the flood zones attributed to the river.	ES Appendix 11.9.6: Flood Risk Assessment - Annex 2 Surface Access Drainage Strategy [APP-148]	
10.25	Flood Risk	PEIR Figure 11 includes a new flood compensation area below Car Park X in the north of the site. Reviewing the drainage areas contained in Figure 11.6.7 it appears that more water would be draining to the northern boundary of the site rather than being held locally as a result of significant new	JLAs	The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds augmented by additional below-ground attenuation storage	N/A	Para 5.3.1 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		development/ infilling between the North and South Terminals. Clarity is needed as to how this water would be collected and the rate it would be released to the Gatwick Stream.		across the airfield to ensure no increase to flood risk.			
10.26	Flood Risk	Environment Agency data plus a modest 1% buffer i.e. takes account of 1 in 100 year events. However, it is not clear how more significant flooding events such as those seen in Europe in summer 2021 are being taken account in the Gatwick hydrology model. At present there seems to be significant reliance on depositing water in the neighbouring rivers and streams rather than providing additional capacity within the site. Although the hydrology model has taken into account the Upper Mole Flood Alleviation Scheme, this only takes account of 1 in 100 year events and is likely to be overwhelmed when summer 2021 European type events repeat themselves in the coming years.	JLAs	<p>The surface water drainage and fluvial mitigation strategies both include allowances for the predicted impact of climate change as required by the NPS and NPPF based on CP09 and CP18 respectively as translated into guidance by the Environment Agency. Additionally, as the Project is classified as a Nationally Significant Infrastructure Project (NSIP), an assessment of the Credible Maximum Scenario was undertaken.</p> <p>The FRA demonstrates that through the provision of additional attenuation storage and floodplain compensatory storage the NRP will not increase flood risk for its lifetime taking climate change into account.</p>	N/A	Paragraphs 3.7.4 to 3.7.11 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.27	Flood Risk	In the event of extreme flooding events how would the airport, road and rail infrastructure be able to cope with a flooded site – what evacuation routes would remain open and would they be accessible to those from across the site as well as those using the public road network?	JLAs	Gatwick is developing a Flood Threat Plan that will demonstrate how the airport will respond to such an event and will be finalised to inform the ES.	The Flood Resilience Statement is included as Annex 6 of the Flood Risk Assessment that demonstrates how Gatwick would safely manage residual flood risk.	Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.28	Flood Risk	There are several significant alterations and road widenings proposed to the Highway network. The proposed surface access improvements drainage strategy mentions the installation of a drainage network consisting of carrier drains, filter drains, ditches and attenuation ponds, along with flow control arrangements to limit discharges to watercourses. Currently the level of information on discharge rates and where the water will go from the Highway Drainage strategy appears limited. Further information is requested especially should greenfield rates not be achievable, these would include the impacts on the surrounding areas and mitigation measures proposed especially south Horley and the proposed Strategic Business Park.	JLAs	The NRP design includes mitigation through storage to ensure no increase in the peak rate of runoff off site. The NRP will include at least 18,500m ³ of additional storage to store the runoff from the increase in airfield impermeable area. The NRP design also incorporates additional fluvial water storage via floodplain compensation areas. The NRP will also provide 85,000m ³ of additional floodplain to ensure no increase in fluvial flood risk from rivers.	N/A	Section 7.2 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.29	Flood Risk	There are several significant alterations and road widenings proposed to the Highway network. The proposed surface access improvements drainage strategy mentions the installation of a drainage network consisting of carrier drains, filter drains, ditches and	JLAs	The surface water drainage strategy for the highways improvements as part of the NRP are being developed further to inform the ES. The updated FRA that will support the ES will include additional detail on the surface water drainage	N/A	Annex 2 Surface Access Highways Surface Water Drainage Strategy Summary of ES Appendix 11.9.6:	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		attenuation ponds, along with flow control arrangements to limit discharges to watercourses. Currently the level of information on discharge rates and where the water will go from the Highway Drainage strategy appears limited. Further information is requested especially should greenfield rates not be achievable, these would include the impacts on the surrounding areas and mitigation measures proposed especially south Horley and the proposed Strategic Business Park.		strategy. We will be able to share the Highways Drainage Strategy with LA's later in 2022.		Flood Risk Assessment [APP-148]	
10.30	Flood Risk	The proposed works will increase the flood risk particularly along the Gatwick stream and River Mole until the mitigation measures are in place which appear in the case of the Gatwick Stream in Riverside Gardens Park – very late in the project timescales.	JLAs	The proposed scheme will not increase flood risk as demonstrated in the FRA. The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	N/A	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.31	Flood Risk	Major road works and flood alleviation measures should be completed before the runway is fully operational.	JLAs	The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	N/A	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.32	Wastewater	The NRP should be carefully planned to ensure that it does not prejudice the expansion of Crawley WwTW, should this be required at any point in the future to serve development needs. Should Thames Water require additional capacity to serve the Project, full details should be provided and consulted upon.	JLAs	Discussions with Thames Water have been ongoing throughout the development of the PEIR and continue with regard to the impact of the proposed scheme on Crawley WwTW	N/A	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	
10.33	Wastewater	We note that there is a potential impact on the wastewater system arising from increased flows in the network exceeding the available capacity which could disrupt airport operations, particularly in and around the terminal buildings. We also understand that there are network capacity limits feeding to the Horley Sewerage Treatment Works which is being placed under greater pressure through the scale of new development taking place north of Horley and the proposed business park. At present it appears in the PEIR that further support is needed from Thames Water for this to be progressed though it will be critical in handling additional material generated by the increased scale of airport operations. It is unfortunate that this still needs to be confirmed by Thames Water. The question is which areas of the wastewater network would need to be improved without a new pumping station east	JLAs	Section 11.9: Hydraulic modelling has been undertaken to determine the impact of the additional flows in the GAL wastewater network infrastructure. The modelling results show that the proposed infrastructure is of sufficient capacity for the projected flows, so it is considered that the impact is negligible, resulting in a negligible/minor adverse effect (not significant). The assessment of effects on the Thames Water network and wastewater treatment works is ongoing and will be updated in the ES. The pumping station east of the Brighton-London mainline is dependent on ongoing discussions with Thames Water and the impact of the NRP on Crawley and Horley WwTW.	N/A	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		of the Brighton-London mainline and when would the new pumping station be needed?					
10.34	Water Supply	More ambitious water efficiency measures, including retrofitting of existing buildings are required. The project maximise the scope for water efficiency savings, given the serious water stress in the south east and current need for water neutrality in the Southern Water Sussex North supply area.	JLAs	Gatwick is in the SES Water catchment area. Gatwick has a Decade of Change target to reduce potable water consumption per passenger by 50% irrespective of whether the Northern Runway Project proceeds or not. The PEIR demonstrates that the additional requirements for water usage can be met by existing infrastructure and GAL has confirmed this in consultation with SESW.	Separately to the NRP Gatwick will deliver water efficiency measures as part of their Second Decade of Change that will reduce water use at the airport by 50% by 2030 (compared to 2019). The Water Management Plan sets out potential measures to reduce water stress at the airport.	Section 4 of ES Appendix 11.9.8 Water Supply Assessment [APP-151] Section 10.8 of ES Appendix 5.3.2 Code of Construction Practice Annex 1 - Water Management Plan [APP-083]	
10.35	Water Supply	At present methods for cleaning surface water before being released into the wider environment lacks detail with references to best practice. Clarity is needed in order to fully assess the proposed measures in order to ensure that contaminated water meets quality standards and that those standards are constantly monitored before release to the fluvial network and wider environment. In the event of water quality standards falling below agreed standards mitigation and clean up measures should be included in a legal document. This would be accordance with local SuDS advice.	JLAs	Additional information will be provided in the ES. Potentially contaminated runoff will be treated prior to discharge into receiving watercourses.	The Project includes a new storage tank within the surface water drainage system beneath Car Park Y and a new treatment facility to the south of Crawley STW. The new treatment facility will take flow from the existing long-term storage lagoons that hold de-icer contaminated runoff from the airfield and treat it prior to discharging it to the Gatwick Stream. These measures will increase the treatment capacity at the airport to ensure no significant environmental impact to receiving watercourses as a result of the Project.	ES Figure 11.8.1 Contaminated Water Path Project Route [APP-057] Table 11.8.1 of ES Chapter 11 Water Environment [APP-036]	
10.36	Water Supply	The Water Supply Assessment does not extend to the full operational water need in 2047 when a potential 80.2 million passengers (Stated in PEIR Chapter 5 para 5.4.5 and this should be taken into account compared with c.46 million passengers using the airport in 2019. It is also unclear how water efficiency savings will be implemented in time for the proposed opening of the Northern Runway and Pier 7. Other plans also suggest the opening of other hotels on the site and it is unclear how these have been factored into the calculation and whether similar low usage rates could be achieved.	JLAs	Calculations will be refined as design progresses, both for forecast water demand and water efficiency measures. The ES will provide further clarity on both calculated water demands through progression of site development, and implementing of water efficiency measures to offset this increase	The assessment of water supply impacts are reported in Appendix 11.9.8 of the ES and encompass the 2047 assessment year.	Paras 11.6.91, 11.6.136, 11.8.6 and 11.13.41 of ES Chapter 11 Water Environment [APP-036] Annex 4 of ES Appendix 11.9.8 Water Supply Assessment [APP-151]	
10.37	Water Supply	We would also be interested to know what effect the recent position statement from Natural England, requiring planning permission applications in the majority of Crawley and north West Sussex to demonstrate that they do not increase pressure on water resources, might have on the above conclusion and how it may affect the projected labour supply in	JLAs	Gatwick is in the water supply area for SESW. Initial conversations were carried out with SESW to confirm availability for any water supply, this will continue to be evaluated and discussed in the ES, and any new statements/policies will be taken into account.	N/A	Section 4 of ES Appendix 11.9.8 Water Supply Assessment [APP-151]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		general as well as the proposed additional labour split by local authority					
10.38	Maintenance	At what point in the process will a maintenance programme of the water infrastructure be made available along with effective monitoring reporting.	JLAs	Maintenance requirements will be addressed in the ES as appropriate to the infrastructure in question. Local Authority owned infrastructure will be the subject of discussion before the ES is written.	A summary of monitoring measures to be adopted by the Project for the water environment are included in Table 11.8.1 of Chapter 11 of the ES and Section 9 of the Water Management Plan. Maintenance measures will be developed as part of the detailed design process following the DCO application.	Table 11.8.1 of ES Chapter 11: Water Environment [APP-036] Section 9 of ES Appendix 5.3.2 Code of Construction Practice Annex 1 - Water Management Plan [APP-083]	
10.39	Design Details	The council has reviewed the relevant chapters with regards to surface water flood risk and sustainable drainage. The proposals submitted so far are very high level, with no real detailed design included within the consultation documents. It is difficult to assess the impact of proposals as the level of detail is not sufficient to scrutinise and further information is requested.	JLAs	The detailed design for the proposed scheme will not be developed until after the DCO application. Additional information will be included as part of the ES.	Annexes 2 and 3 of the FRA (ES Appendix 11.9.6) include an overview of the surface water drainage proposals for the project. Requirements 10 and 11 of Schedule 2 to the draft DCO provide that no part of the authorised development (save for the identified exceptions) are to commence until written details of the surface water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by the named relevant authority. Such drainage details submitted for approval are to be in general accordance with the drainage design principles included in Appendix 1 to the Design and Access Statement.	ES Chapter 11 Water Environment [APP-036]	
10.40	Water	More evidence behind the drainage strategy work, noting the Applicant responded to TWG on 3 May 2022 that the concept designs would be shared within weeks. At a later meeting in October 22 the Applicant promised a 'presentation on highway drainage but would not share final data until pre-submission;	JLAs	Requirements 10 and 11 of Schedule 2 to the draft DCO provide that no part of the authorised development (save for the identified exceptions) are to commence until written details of the surface and foul water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by the named relevant authority. Such drainage details submitted for approval are to be in general accordance with the drainage design principles included in Appendix 1 to the Design and Access Statement. Specifically on the highway works, the design principle as stated in the DAS (and secured by Requirement 11 of the dDCO) states that "The	N/A	ES Chapter 11: Water Environment [APP-036], Design and Access Statement Volume 5 [APP-257], draft Development Consent Order [APP-006] and ES Appendix 11.9.6: Flood Risk Assessment - Annex 2: Surface Access Drainage Strategy [APP-147]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				drainage design for the highways works should comply with the principles set out in the ES Appendix 11.9.6 Flood Risk Assessment - Annex 2 Surface Access Drainage Strategy."			
10.41	Crawley WwTW	The NRP should be carefully planned to ensure that it does not prejudice the expansion of Crawley WwTW, should this be required at any point in the future to serve development needs. Should Thames Water require additional capacity to serve the Project, full details should be provided and consulted upon.	CBC	N/A	Discussions with Thames Water are ongoing and continue with regard to the impact of the proposed scheme on Crawley WwTW. No impediment has been raised by TW to date.	Para 5.3.2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Para 8.1.5 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]	
10.42	Flood risk mitigation strategy	No recommendation can be made at this stage until the full fluvial and pluvial flood risk mitigation strategy has been submitted for consultation. CBC requests early engagement as this is developed.	CBC	N/A	<p>The fluvial and pluvial mitigation strategy has been set out in the ES Appendix 11.9.6 Flood Risk Assessment, including indicative design drawings in Annex 1.</p> <p>Requirements 4 and 5 of the draft DCO require approval from the local planning authority and highways authority respectively to the detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix A1 of the Design and Access Statement. These will include measures to mitigate pluvial flood risk.</p> <p>Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency.</p> <p>The plan will set out the timing of the proposed FCAs in relation to the construction of Project works that encroach onto the floodplain, to ensure no increase in fluvial flood risk to other parties.</p>	<p>Section 6 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147] and ES Appendix 11.9.6 Flood Risk Assessment – Annex 1: Fluvial Mitigation Measures Indicative Designs [APP-148]</p> <p>Draft DCO Schedule 2 [APP-006]</p> <p>Design and Access Statement Volume 5, Appendix 1 [APP-259]</p> <p>Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p>	
10.43	Drainage concept designs	In respect of the overall drainage strategy CBC remain concerned that the concept designs will not provide sufficient detail. CBC would like to see the evidence behind the FRA work that underpin the concept design. Jonathan indicated that the concept designs would be shared 'within weeks'. These need to be circulated in good time (more than 5 days) if	CBC	N/A	The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds augmented by additional below-ground	Section 7.3 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Table 1.1.1. of ES Appendix 11.3.1 Summary of	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		<p>the TWG is to provide meaningful feedback on these.</p> <p>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</p> <p>11 (c) No recommendation can be made at this stage until the full fluvial and pluvial flood risk mitigation strategy has been submitted for consultation. CBC requests early engagement as this is developed.</p>			<p>attenuation storage across the airfield to ensure no increase to flood risk.</p> <p>Table 1.1.1. of ES Appendix 11.3.1 Summary of Stakeholder Scoping Responses – Water Environment sets summarises the comments received from the Environment Agency on the PEIR.</p> <p>The consultee comments received as part of the statutory and non-statutory consultations have been summarised and responded to in Section 1.19 of Annex B to the Consultation Report [APP-220].</p> <p>The fluvial and pluvial mitigation strategy has been set out in the ES Appendix 11.9.6 Flood Risk Assessment, including indicative design drawings in Annex 1.</p> <p>Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency.</p> <p>The plan will set out the timing of the proposed FCAs in relation to the construction of Project works that encroach onto the floodplain, to ensure no increase in fluvial flood risk to other parties.</p>	<p>Stakeholder Scoping Responses – Water Environment [APP-141]</p> <p>Section 1.19 of Annex B to the Consultation Report [APP-220]</p> <p>Section 6 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147] and ES Appendix 11.9.6 Flood Risk Assessment – Annex 1: Fluvial Mitigation Measures Indicative Designs [APP-148]</p> <p>Design and Access Statement Volume 5, Appendix 1 [APP-259]</p> <p>Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p>	
10.44	Capacity for the sewage treatment works	With regard to wastewater, CBC have key concerns about the impact of the development on the capacity for the sewage treatment works to expand. This question [11 b] remains outstanding as it was not addressed.	CBC	N/A	<p>Thames Water has yet to confirm whether their existing infrastructure would be able to cope with the additional flows that would result from NRP or if additional capacity would be required. Therefore, GAL is undertaking further work to consider alternative options to ensure the feasibility of the wastewater management plans of the NRP.</p> <p>It should be noted that these works are separate to the new facility intended to increase de-icer treatment capacity at the airport.</p>	N/A	
10.46	Design parameters	Drainage – South Terminal Roundabout (fig 2.3 substantial modification to surface water	CBC	N/A	The highways drainage includes mitigation measures to ensure no increase in flood risk	Annex 2 of ES Appendix 11.9.6:	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		pond) CBC request the design parameters (in accordance with the SuDs manual) 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.			to other parties and has been designed in accordance with The SuDS Manual. The drainage design including the mitigation will be subject to detailed design which will be undertaken after the DCO application. Requirements 10 and 11 of the draft DCO require approval from the lead local flood authority and highways authority respectively to the detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix A1 of the Design and Access Statement.	Flood Risk Assessment [APP-147] Draft DCO Schedule 2 [APP-006] Design and Access Statement Volume 5, Appendix 1 [APP-259]	
10.47	Airport Way works	Airport Way works (addition of 3rd lane) . CBC request further detail on the extent to which this proposal will increase the existing impermeable area and further information on how this will be mitigated.	CBC	N/A	As responded to in 10.46.	N/A	
10.48	Highway works	CBC require more detail on the drainage impact of these highway works (including further information on the net loss of greenfield space /permeable run off and how and where mitigation will be carried out.	CBC	N/A	As responded to in 10.46.	N/A	
10.49	Flood compensation assumptions	Updated flood compensation assumptions of Museum Field and Car Park X, south of Sewage Treatment works , Pond A and Dog Kennell Pond. CBC has insufficient detail to accept the assumptions set out in this update and request that it is provided with further information including: . 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. . CBC also requests confirmation that the concept design showing how the museum field compensation storage area will connect to the River Mole will not have a detrimental effect on the geomorphology of the watercourse bed. . CBC also requires a Construction Phase Plan for the management of surface water during construction (this can be supplied closer to the time the developer will be mobilising to site to accommodate any future changes in the flood	CBC	N/A	The Floodplain Compensation Areas (with other measures) have been designed to mitigate for the loss of floodplain due to the Project for all events up to and including the 1% Annual Exceedance Probability (AEP) (1 In 100) event plus an allowance for climate change of +20% for peak river flow. Thus takes into account the lifetime of the Project in accordance with current guidance published by the Environment Agency. The reduction from 35 to 20% for peak river flow was a result in a change in Environment Agency guidance that was published between the PEIR and ES stages of the Project. The ES sets out the impacts of the project on the water environment. The construction of the Museum Field including its connection to the River Mole is not assessed to result in significant environmental impacts. Gatwick has committed to post-construction	Section 3.7 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] ES Chapter 11: Water Environment [APP-036]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		risk plan). GAL should also ensure that because of the significance and sensitive nature of this scheme a post construction certification of the drainage works is provided to CBC and other drainage authorities. This shall confirm that the proposed works including the SuDS flood mitigation features proposed in the FRA and drainage statement have been constructed as stated. This shall be carried out by a third party and not the consultants engaged for the flood risk mitigation design.			<p>monitoring of sediment in the River Mole at this location.</p> <p>The proposed highway drainage works and Floodplain Compensation Areas will be subject regulatory acceptance via Ordinary Watercourse consent and Flood Risk Activity Permits respectively.</p> <p>Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency.</p>	Draft DCO Schedule 2 [APP-006]	
10.50	Flood compensation areas	<p>It is noted that flood compensation areas are being reduced at Museum Field and Car Park X and that 2 other flood compensation areas and 2 pond extensions are now not required. However, a new treatment works to clear de-icer and contaminated runoff is now proposed to the east of Crawley Waste Water Treatment Works, on the site of the former Rolls Farm. CBC notes that there is no detail on what this infrastructure would consist of, nor the visual impact this might have. It is therefore unclear if this infrastructure has any negative impact on nearby houses to the south in Radford Road in terms of visual impact or odour and whether there is a negative impact on biodiversity (it appears to be on land managed for biodiversity by the Gatwick Greenspace Partnership). CBC wishes to see further detail on this proposal and also seeks assurances that the siting of this infrastructure would not have a negative impact upon the potential expansion of the Crawley Waste Water Treatment Works which the council's Water Cycle Study 2020 has indicated may be necessary to support future development in the borough.</p> <p>The council would welcome the opportunity to be involved with GAL in discussions with Thames Water regarding the capacity constraints at the Crawley Treatment Works, in the light of cumulative growth in the area combined with single runway airport growth and the NRP.</p>	CBC	N/A	<p>ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment – Annex 6 New Water Treatment Works shows an indicative plan of the new works infrastructure and positioning within the site of the former Rolls Farm.</p> <p>Discussions with Thames Water are ongoing and continue with regard to the impact of the proposed scheme on Crawley WwTW. No impediment has been raised by TW to date.</p> <p>ES Chapter 8: Landscape, Townscape and Visual Resources includes an assessment of effects on walkers using public right of way 360/1Sy at Tinsley Green. The location adjacent to the proposed waste water treatment works is illustrated in panoramic photos at Figure 8.4.15 and the maximum parameters of the Project are shown in photomontage wirelines at Figures 8.9.41 to 8.9.44. The assessment of effects on visual amenity in section 8.9 of the ES identifies Moderate adverse effects during construction and when complete, reducing to Minor adverse when landscape mitigation matures. No effects on views from residential properties on Radford Road are considered likely.</p> <p>ES Chapter 9: Ecology and Biodiversity includes the proposed treatment works at Rolls Farm within the overall assessment of effects. Appendix 9.9.2 Biodiversity Net Gain</p>	<p>ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment – Annex 6 New Water Treatment Works [APP-145]</p> <p>Para 5.3.2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Section 8.9 and Figures 8.4.15 and 8.9.41 to 8.9.44 [APP-117]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Report include figures showing the loss of habitat in this area. Do we want to involve CBC in discussions with TW?		
10.51	Scheme drainage changes	CBC comment that overall there seem to be quite a few changes since the PEIR and there has been no real detail provided to help understand these. While there is a repeat commentary on further detail not being provided this is not helpful to CBC or others if we can't be certain on the base assumptions provided to underpin the strategy. The risk of not providing the information now is that it could be a problem later in the process.	CBC	N/A	Information on the drainage and fluvial mitigation measures are included in the Flood Risk Assessment. This includes the overall approach to mitigation and the assumptions that have been made to develop the mitigation measures.	ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.52	Scheme drainage changes	CBC request more detail on the drainage changes proposed, the summary table does not seem to pick up the changes described at the presentation.	CBC	N/A	Responses were provided at the Topic Working Group meeting on 9 February 2023. A summary of the surface access improvements and airfield surface water drainage strategies are provided as Annexes 2 and 3 respectively to the Flood Risk Assessment.	ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Annexes 2 and 3	
10.53	Proposed monitoring scheme	CBC request further information on the proposed monitoring scheme post construction for museum field – picking up the issues that were explained regarding silting and build up.	CBC	N/A	Regular monitoring of any change to the River Mole channel bed and banks would be undertaken, particularly in the vicinity of the re-naturalised channel, the Museum Field FCA spillway and Car Park X outfall, following completion of the Project. This would be undertaken using fixed point photography or other means.	Section 6.6 of ES Appendix 11.9.1 Geomorphology Assessment [APP-142]	
10.54	Attenuation features	CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y. Please can further details be provided of what these works consist of and what the impact are on tree screening? Car Park X works have potential to have a negative impact on nearby listed buildings.	CBC	N/A	The proposed works required for Car Park X would not have any impact on nearby listed buildings. Some removal of the hedgerow boundary on Charlwood Road would be required to widen the existing access point. Sufficient vegetation would be retained to completely screen the development in the summer, with the potential for heavily filtered glimpses of the decking in the winter only, when the vegetation is not in leaf. Vegetation would largely screen any views of the decked car park looking from or across the listed buildings. Existing photography at Viewpoint 26: Bridleway at Poles Lane is included at ES Figure 8.4.31. Visualisations showing the winter and summer views along Charlwood Road along with the massing outline of Car Park X are	Section 6 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147] and ES Appendix 11.9.6 Flood Risk Assessment – Annex 1: Fluvial Mitigation Measures Indicative Designs [APP-148] ES Chapter 8: Landscape, Townscape and Visual Resources Figures 8.9.101 – 8.9.104 [APP-061].	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					presented as photomontages at ES Figures 8.9.101 to 8.9.104. Car Park Y will be underground storage, therefore after construction, it is expected that there will be negligible landscape and visual impacts during operation.	Para 7.3.3 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.55	Wastewater capacity	In relation to Wastewater CBC do not agree with the conclusions set out in that slide. GAL should await a final comment from Thames before firming up the proposals in relation to this area. CBC welcome the comment made at the meeting that there was 'some flexibility' in relation to the positioning of the de icing facility if Thames need to expand. CBC request that further information about the land take around the sewage treatment plan and de-icing be provided to understand how capacity could be safeguarded.	CBC	N/A	ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment – Annex 6 New Water Treatment Works shows an indicative plan of the new works infrastructure and positioning within the site of the former Rolls Farm.	ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment – Annex 6 New Water Treatment Works [APP-145]	
10.56	Potable water usage targets	CBC request that GAL confirm what the potable water use targets are for the development.	CBC	N/A	The Project does not include a target for reduction in potable water use. However separately to the Project, Gatwick is committed to reduce water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment.	Para 11.5.2 and 11.6.93 of ES Chapter 11 Water Environment [APP-036]	
10.57	Drainage Officer queries	A number of detailed questions raised by the CBC drainage officer Segun Oke remain unanswered. When can CBC expect a response be provided to these?	CBC	N/A	The questions raised have been addressed in a series of Topic Working Group meetings. A summary of these discussions are captured in the Consultation Report.	Consultation Report [APP-218]	
10.58	Request for hydraulic modelling	(1)The initial plan by GAL back in July 2022 in response to the updated climate change allowance was to (i) reduced in size the Museum Field and Car Park X flood compensation areas, (ii) remove the flood compensation area to the south of Crawley Sewage Treatment Works and the small area to the east of Museum Field as they will no longer be required and (iii) the surface water drainage Pond A and the extension to Dog Kennel Pond will also no longer be required. In line with this new development I requested GAL to send me a simple tabulated hydraulic model report showing the comparison between the storage requirement of the original 35% CC	CBC	N/A	The changes to the fluvial flood mitigation volumes to be provided by the project from PEIR to ES were presented at the :and Topic Working Group in February 2023. The additional fluvial and drainage capacity provided by the Project presented in the DCO application are: Museum Field FCA = 81,500m ³ ; Car park X FCA = 20,000m ³ ; Car Park Y tank = up to 32,000m ³ ; Airfield drainage tanks = 8,500m ³ The Project mitigation volumes compared to those included previously at the PEIR stage are as a result of updated guidance regarding the incorporation of the predicted	Minutes of Topic Working Group 5 (February 2023) Section 3.7 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		and the new 20% CC . This will buttress the explanation of how this reduction was arrived at and help to demonstrate the practicality of this scenario, but this request was never attended to and the information has not yet being supplied.			impact of climate change on fluvial flood risk in Flood Risk Assessments by the Environment Agency in 2022.		
10.59	Request for hydraulic modelling	(2)Sequel to the above development, the last TWG which the above slide relates to indicates that pond A was actually removed to accommodate the new Juliet taxiway in contrast to the earlier statement by GAL, and several storages have now been provided to compensate for the removal of pond A. Can GAL kindly send me the requested information in 1 above.	CBC	N/A	The additional surface water attenuation within the former Pond A catchment (detailed in Para 7.3.2 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]) mitigate for the increase in impermeable area from the runway and taxiways and are not related to the removal of Pond A	Para 7.3.2 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]	
10.60	Highway attenuation	(3)The slide and presentation shows that 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. I want to believe 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.	CBC	N/A	The surface access improvements drainage strategy includes a number of SuDS measures to address the additional runoff and traffic that would result from the Project. These include oversized pipes, ponds and swales. A HEWRAT assessment of the water quality impacts of the highways improvements has been undertaken and no significant environmental effects have been identified.	Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] ES Appendix 11.9.3 Water Quality HEWRAT Assessment [APP-144]	
10.61	Highway attenuation	(4)The proposed highway drainage strategy will reduce discharge by 38% to the Gatwick stream and 50% to the river Mole, while this may be an acceptable approach, can GAL kindly have a look at the effect this reduction in discharge will have on biodiversity and provide mitigation where necessary.	CBC	N/A	The proposed reduction relates to peak flows only during rainfall events, not overall runoff volume. The attenuation storage measures included in the highways drainage design to prevent an increase to flood risk will still discharge to the same receiving watercourses but over a longer period of time, consequently there would not be a significant impact upon their biodiversity.	Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.62	Geomorphology	(5)During the last focus consultation on highway improvement works and updated changes to flood risk management back in July 2022, I requested for GAL's plan to ensure that the proposal to connect the museum field compensation storage area with the River Mole will not have a detrimental effect on the geomorphology of the watercourse. From the above slides and in response to this GAL has proposed to put in place a post construction monitoring plan to monitor the river Mole. I want to believe this will be in conjunction with erosion control design measures that will be	CBC	N/A	The need for erosion control measures at the connection between the River Mole and the Museum Field FCA will be considered during the detailed design process, after the DCO application.	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		put in place to arrest or minimise the effect of this connection on the geomorphology and the possible migration of the banks to the river Mole. Can GAL confirm that aside from the post construction monitoring exercise, erosion control measures will form part of the design to connect these two flood structures.					
10.63	Attenuation	6)One of the slide above shows a concrete section which is used to depict car park Y attenuation tank, while I understand the need for GAL to attenuate water using systems that can be designed to reduce the attraction of birds, the use of a more sustainable approach with reduced carbon footprint will be the preferred option rather than using designs with a high carbon foot print.	CBC	N/A	<p>The form of the below-ground water storage in the Car Park X floodplain compensation area will be considered during the detailed design process, after the DCO application. However the structure will need to withstand significant loading from the surrounding ground. Requirement 23 of the draft DCO states that Gatwick will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency</p> <p>Gatwick has committed to achieving Net Zero for GHG emissions (GAL Scope 1 and 2) within the Carbon Action Plan, and in order to deliver this will be systematically working with design teams to reduce and avoid the need for the most carbon-intensive materials and construction processes. The storage tank proposals at Car Park Y will undergo a review from a carbon management perspective in line with this wider carbon management strategy for the development during the subsequent design phase after the DCO application.</p>	<p>Draft DCO Schedule 2 [APP-006]</p> <p>Carbon Action Plan [APP-091]</p>	
10.64	Hydraulic modelling	(7) During the presentation one of the officers from Mole valley council made mention that a recent visit to the long bridge shows the water level just a few inches below the bridge soffit. GAL responded that the peak flow rate to the river Mole pre and post construction will remain the same but the discharge will be for a longer period of time, therefore, it is most unlikely that the water will overwhelm the bridge. This principle will only stand if there is no obstruction to the flow within the watercourse downstream this area. Can GAL confirm how this possibility has been dealt with during the hydraulic modelling phase.	CBC	N/A	<p>Hydraulic modelling undertaken to inform the Flood Risk Assessment demonstrates that the Project would not increase peak water levels in the River Mole.</p> <p>The pre-existing risk of debris blocking any of the local watercourses would not be altered by the Project.</p>	<p>ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
10.65	Impact on River Mole	An additional meeting should be arranged to deal with the overlap between drainage and ecology matters in particular in relation to the northwest area and the impact on the River Mole. It would be good to understand the drainage design and engineering solutions necessary and the impact these have on ecology in relation to matters such as sediment build up, flood overspill, de-icer storage and pollution control measures. Further information should be provided on the management of both the drainage features and ecological mitigation measures.	CBC	N/A	The impact of the scheme on drainage, ecology and water is fully assessed in the ES. GAL would be happy to arrange a meeting to discuss any specific queries on these elements of the Project.	ES Chapter 11: Water Environment [APP-036] and Chapter 9 Ecology and Nature Conservation [APP-034]	
10.66	Sewage treatment works	CBC still remain concerned about the proposed new treatment works and proposal immediately adjacent to the Thames STW in the absence of any confirmation /comment from Thames Water on the compatibility of these works with its ability to expand the STW if required. CBC would like to see any response GAL have received from Thames Water on this capacity issue and the other infrastructure works proposed near the STW.	CBC	N/A	As above in 10.41/10.44	As above in 10.41/10.44	
10.67	Water Neutrality	GAL's response re: Water Neutrality and the Natural England Position Statement has been noted, however the situation is a developing one and we request that GAL undertakes careful and continued assessment of the implications of these unique circumstances on the NRP.	HDC	N/A	The response from HDC is noted. Liaison is ongoing with Sutton and East Surrey Water as the water company that supplies Gatwick with its water.	N/A	
10.68	Flood Risk Mitigation	What flood risk mitigation is taking place outside of the NRP site boundary, particularly upstream. How will this be synergised with potential mitigation strategies on nearby developments like Land West of Ifield?	HDC	N/A	The proposed mitigation measures are specific to the Project designed to deal directly with its impact in flood risk. No flood risk mitigation is placed outside the NRP boundary. A screening of other developments and plans has been undertaken and determined that no water interactions between other developments will impact the NRP project as reported in the Cumulative Effects Assessment.	Section 11.11 of ES Chapter 11 Water Environment [APP-036] ES Appendix 20.4.1 Cumulative Effects Assessment [APP-216]	
10.69	Crawley Wastewater Treatment Works Capacity	HDC concerns around the cumulative effects of the Project and other planned development on the capacity of the Crawley Wastewater Treatment Works and evidence of liaison with Thames Water regarding this issue	HDC	N/A	As above in 10.41/10.44	As above in 10.41/10.44	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
10.70	Bridge soffit at Longbridge	Visual evidence has shown the water level just a few inches below the bridge soffit at Longbridge. When raised the response from GAL officials given to MV was that the peak flow rate to the River Mole pre and post construction will remain the same but the discharge will be for a longer period of time. GAL suggested that was therefore most unlikely that the water will overwhelm the bridge. However, concerns are raised that GALs suggestion will only stand if there is no obstruction to the flow within the watercourse downstream of this area. Can GAL confirm how this possibility has been dealt with during the hydraulic modelling phase?	MVDC	N/A	As per 10.64. Hydraulic modelling undertaken to inform the Flood Risk Assessment demonstrates that the Project would not increase flood risk to other parties. Therefore should a watercourse blockage occur, the Project would not exacerbate subsequent effects.	ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.71	Burstow Stream	Tracker does not appear to have picked or addressed our comments on the Burstow Stream and potential for flooding.	TDC	N/A	The Flood Risk Assessment sets out the proposed impact of the scheme and its integrated mitigation. The Project is not located within the floodplain of the Burstow Stream. The highways attenuation pond proposed to the north of the south terminal roundabout would ultimately discharge to the Burstow Stream but would include attenuation measures to ensure no change to existing flood risk on the watercourse.	Annex 2 ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.72	Diverse Queries	Queries re. maintenance access to ponds , climate change allowances, betterment etc	SCC	N/A	Sufficient access has been considered in the layout of drainage elements of the Project. These will be refined as they are developed further during detailed design after the DCO application. The consideration of the predicted impacts of climate change are integral to the flood risk assessment, which has been undertaken in accordance with current Environment Agency Guidance. The Project does not have to provide betterment in terms of flood risk based on national planning policy. It does ensure that there will be no increase in flood risk to other parties for its lifetime.	Section 3.7 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Section 3.1 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.73	Ground storage and conveyance	Want to see workings in discounting above ground storage and conveyance for each location where it has been discounted - justification required	SCC	N/A	Above ground storage of runoff has been discounted for airfield drainage elements due to the potential safeguarding risk it would pose to operations. Open bodies of water in the vicinity of the runway could attract wildfowl and pose a bird-strike risk to aircraft.	ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Above ground storage of rainfall runoff is proposed as part of the surface access highways drainage strategy although these will be dry basins when not in operation, rather than permanently wet ponds, due to the same safeguarding concerns.		
10.74	Climate Change Allowances	The Environment Agency have also updated the climate change allowances for the 1 in 30 and 1 in 100 rainfall events for the catchment containing Gatwick. It is unclear from the consultation document whether GAL are using Central Allowance or Upper end Allowance. It is assumed that the 2070s development lifetime is used as that takes account of development with a lifetime between 2061 to 2125?	SCC	N/A	As the adopted lifetime of the surface access works is 100 years (up to 2132), the Flood Risk Assessments: Climate Change Allowances guidance (Environment Agency, 2022a) states the Upper End allowance of plus 40 per cent for the 2070s epoch (2061 to 2125) should be adopted for the highways surface water drainage design for the 1 per cent (1 in 100) AEP event. Given the adopted lifetime for the airfield works of 40 years (up to 2069), the airfield surface water drainage design has adopted the Central allowance of plus 25 per cent for the 2070s epoch (2061 to 2125) in accordance with Flood Risk Assessments: Climate Change Allowances guidance (Environment Agency, 2022a) for the 1 per cent (1 in 100) AEP event for rainfall intensity.	Para 3.7.14 to 3.7.16 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
10.75	Draft DCO	SCC comments incorporated into combined response. County council specific comment such as need for protective provisions for drainage authority	SCC	N/A	GAL are of the view that the standard protective provisions are sufficient however if SCC has a standard set of protective provisions that they can share, GAL is happy to meet and discuss.	N/A	
10.76	Water treatment plant	Improving water quality is vital and the proposed additional water treatment plant to the east of the Crawley Sewerage Treatment Works provides an option to improve the water quality being discharged from Pond D into the Gatwick Stream and River Mole. Details on this are limited but the quality of water being discharged into the fluvial network was one of Reigate and Banstead's concerns in the PIER consultation in 2021.	RBBC	N/A	The ES and supporting water quality impact assessment provide additional information on the mitigation measures that would be incorporated into the scheme to ensure no deterioration in existing water quality. These measures are secured via Requirement 4 of the draft DCO that requires approval of the detailed designs by the local planning authority prior to the commencement of construction.	Table 11.8.1 of ES Chapter 11 Water Environment [APP-036] ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145]	
10.77	Bridge construction environmental impacts	Not clear if bridge construction environmental impacts over River Mole have been taken into account.	RBBC	N/A	While the existing A23 Brighton Road is being demolished, a floating protective barge will be placed underneath the bridge to capture debris. There would be minor adverse effects on the River Mole associated with construction of the surface access improvements at Longbridge Roundabout and on Man's Brook associated with the creation of two	Para 7.5.17 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Para 11.13.5 of ES Chapter 11 Water Environment [APP-036]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					bridges. Again, with the provision of mitigation and best practice measures secured in Design Principles in Design and Access Statement [APP-256] and ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113 to APP-116] as a Schedule 2 requirement in the Draft DCO [AS-005], these effects during the initial construction phase are not environmentally significant.		
10.78	Surface Water Flooding	Surface Water Flooding, RBBC still needs to review the final documents before it commits to any SoCG on the matter. The recent down pour on 9th May 2023 highlighted the vulnerability of the Gatwick area to surface water flooding with a number of roads flooded.	RBBC	N/A	The comment is noted.	N/A	

Table 11: Major Accidents and Disasters

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
11.1	Public Safety Zones	Details should be provided on how the current PSZ and new PSZ for the Northern runway relate to proposed land uses for the NRP	JLAs	A standardized PSZ shape has replaced the previous risk-based model profile (see plan). The EIA will provide detail on the PSZ for the Northern Runway. Note that Pentagon Field is no longer proposed due to the removal of the car park previously proposed for this area.	N/A	Table 2.4.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.2	Local Road Network	What would the wider impacts be on the local road network should a major issue occur?	JLAs	Traffic and Transport impacts have been addressed based on the approach and methodology set out in the Institute of Environmental Management and Assessment (IEMA) guidance (IEMA, 2004). It is customary to base traffic assessments on everyday conditions, so the consequential effects of failures of other transportation systems or nodes, or indeed industrial action are not typically evaluated. In the event of an incident, the Airport Operational Management Centre would advise on the response measures to be taken.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089] Paragraph 12.9.5 onwards ES Chapter 12 Traffic and Transport [APP-037]	
11.3	Local Road Network	With regards Major Accidents and Disasters, GAL has proposed to scope out such issues and describes that there are extensive mitigation and contingency measures in place but they are confidential and cannot be detailed in the EIA.	JLAs	The issue of confidentiality was raised in the Scoping Report which was issued to the Planning Inspectorate (PINS) in September 2019. The PEIR was subsequently prepared in line that opinion. Fresh consideration was given to specific events and scenarios which had previously been excluded, further information was provided on the systems currently in place at the airport to manage or mitigate potential effects, and addition assessments were made of comparative risks. The issue of confidentiality was not again raised.	N/A	Table 2.4.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.4	Local Emergency Response	Concern that NRP would result in fire stations close to the airport being called upon more frequently for Gatwick 'domestic' incidents. Therefore, clarity is required about whether Gatwick Fire and Rescue Service are still going to be operating a domestic appliance and if the category of the airport would remain the same.	JLAs	Following the NRP, Gatwick Fire and Rescue Service will still operate a domestic appliance. The category of the airport will remain the same.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
11.5	Local Emergency Response	In the event of a major incident or disaster, there would be an increased demand for humanitarian support required, which would put higher demands and pressures on acute hospitals/local authorities and rest centre requirements. Currently, capacity is identified in local hotels to accommodate rest centres or reunion areas and further information is required about whether this would change (given the increase in passengers and higher demands for accommodation).	JLAs	The demand for humanitarian support in response to a major incident or disaster would be dependent upon the nature of the specific event. The NRP will result in an increase in passenger numbers and total aircraft movements. However, it won't introduce fundamentally new or "bigger" hazards and thus, within the frequency with which major events occur, would not be expected to result in higher demands and pressures on acute hospitals/local authorities and rest centres.	N/A	Table 2.4.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.6	Local Emergency Response	WSCC Fire Service have asked that they be included in any future consultations or discussions in relation to mitigation works taking place that form part of the project in relation to wildfires and flooding. There are concerns from WSCC in relation to flood risk increasing through the increase of infrastructure. The River Mole, which runs through the airport, already poses a substantial risk when water levels are high or there is heavy rainfall.	JLAs	WSCC Fire Service will be included in future consultations on mitigation works in relation to wildfires and flooding.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.7	Local Emergency Response	It is not clear if Surrey Fire & Rescue service been involved in the consultations. WSCC recommends that they are included going forward if not consulted to date.	JLAs	Surrey Fire & Rescue service is a Statutory Consultee.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.8	Local Emergency Response	WSCC require clarity also on whether there is enough capacity at local A&E departments and within the broader emerging ICS (Integrated Care System) to cope with the demand of an additional	JLAs	Residual impact on external healthcare providers is not solely a factor of passenger throughput, as the intervention, triage and care provided can significantly reduce the need for ambulance call outs and referral. A forecast of port health statistics has been provided and will be further explored at ES the stage. In terms of construction impacts, the	The impact on external healthcare providers is assessed in Section 18.8 of ES Chapter 18 Health and Wellbeing. Paragraph 18.8.556 explains that "there are a suitable range of existing primary, secondary and emergency healthcare services located in proximity to the Airport. The great majority of passengers (circa	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		14 million passengers passing through the airport every year.		proportion of non-home-based staff will not be significant, and an occupational health service provision will be in place to address the occupational health needs of the workforce, removing impacts upon local public health care capacity. This will be explored as part of the ES. Population growth and associated health care demand due to the economic prosperity that the northern runway will bring has not been considered. Residential developments that would directly cause any rapid increase in migration would be the target of proportionate planning contributions to address any gap in NHS budget allocations. This would be funded through Tax and National Insurance.	99.998%) would have no implications for local ambulance and A&E capacity".	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]	
11.9	GAL & Other Emergency Response	What are the emergency measures in place for aircraft when the emergency northern runway is 'not available as a standby runway for a period of several months'?	JLAs	Should circumstances arise where an aircraft could not use the runway(s) at Gatwick, for whatever reason, it would be diverted to an alternative airport.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.10	GAL & Other Emergency Response	With the increase in the terminal forecourt areas and increased passenger numbers, there is concern this could increase the risk of potential terrorist activities taking place in these locations. WSCC recommend consultation with the National Counter Terrorism Security Office (NaCTSO) if this has not already been undertaken.	JLAs	It is highlighted that GAL's engagement with NaCTSO is an on-going activity, and not one that occurs solely during airport development planning, although they are of course consulted on this issue. The risk of potential terrorist activities is not really a function of passenger numbers or forecourt development. The increased capacity associated with the Project would not therefore be expected to have a direct effect on this aspect.	N/A	Table 2.4.3 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.11	Sundry	Would the rendezvous points remain in their current locations or would these be relocated? This would impact emergency services and possibly the attending appliances if these were to be relocated.	JLAs	The precise locations of rendezvous points will be determined at the Project's detailed design stage. The locations will be established with due consideration given to emergency response logistics.	N/A	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters [APP-089]	
11.12	Sundry	Occupational hazards associated with earthworks, and airside construction activities generally	JLAs	Will be further evaluated in the ES	Occupational hazards during construction including falls from heights are evaluated in Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089). Health and safety hazards would be controlled through a Safety Management System (SMS) certified to	Table 5.1.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					OHSAS 18001 or ISO45001, and established health and safety procedures. Jointly, these would address the identification, control and elimination of the typical range of construction hazards and risks: falls, mobile plant, falling material and collapses, electrical accidents manual handling, exposure to hazardous materials, etc. Effective implementation of the SMS would control the risk of a major accident during construction.		
11.13	GAL & Other Emergency Response	Rail transportation accidents including collision with trains, trams or inter terminal rail during construction works. The assessment will consider the transportation by rail of construction materials and aggregates if this Project is taken forward	JLAs	Will be further evaluated in the ES	Transport rail accidents during construction have been assessed in Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089). Any works near to the existing railway would be undertaken in accordance with railway working procedures to ensure safe working practices, thereby minimising the risk of accident. A detailed response is set out in Table 5.1.2.	Table 5.1.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.14	GAL & Other Emergency Response	Disruption to airport operations resulting from severance of utilities, including air safety and airside systems, during construction operations	JLAs	Will be further evaluated in the ES	Disruption to airport operations is evaluated in Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089). GAL has contingency plans in place for the total and partial loss of electricity, and failure of natural gas, foul sewage, and potable water infrastructure. In each case the plans set out communications requirements, and the priority actions (checking fuel and running condition of all standby generators, isolating equipment, deploying waste tankers, release of trapped persons from lifts, etc) necessary to limit the impact of an event on people and the environment. Further detail is set out in Table 5.1.2.	Table 5.1.2 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.15	Sundry	Potential for bird strike due to an increased risk of attracting birds from additional landscaping, water bodies and flat roof buildings	JLAs	Will be further evaluated in the ES	Table 5.1.4 sets out the measures that demonstrate that the risk of bird strike would be 'no worse' than the existing situation following implementation of the Project. Further details including arrangements put in place to manage the risk of bird strike are set out in Table 5.1.4.	Table 5.1.4 of ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]	
11.16	Major Accidents and Disasters	Information regarding potential effects upon emergency response times for vehicles attending the airport.	JLAs	Section 18.5 of ES Chapter 18: Health and Wellbeing provides an assessment of the Project on emergency response times against each assessment year.	Section 18.8 of ES Chapter 18 Health and Wellbeing (APP-043) provides an assessment of effects including impacts associated with delays for emergency services.	ES Chapter 18: Health and Wellbeing [APP-043]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					The Gatwick Fire and Rescue Service would still operate a domestic appliance. The category of the airport would remain the same and would not change as a result of the Project.		
11.17	Design and Potential Effects	<p>There are a number of comments from West Sussex Fire and Rescue regarding the design and potential effects upon emergency response times, some aspects are given below. A meeting to discuss these elements would be welcomed.</p> <ul style="list-style-type: none"> a) CARE facility – WSCC Fire and Rescue would require consultation on the Fire Prevention Plan, is this available as an outline document? b) How has/will fire fighting detection and infrastructure been considered in the outline design? c) 5.2.51 – we would like to understand what this provision/facility would look like d) 5.2.59 – has fire prevention infrastructure been considered in the outline design? Engagement with West Sussex Fire and Rescue would be required to ensure this has been factored in. e) Notification through the construction phase will be required, especially in relation to decommissioning of sprinkler system for 	WSCC	N/A	The specific points raised in the issue will be addressed during the detailed design of the Project including specific measures to respond to fire prevention and the design of the facility itself. GAL will be in touch with WSCC to arrange a meeting to discuss the points set out.	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		<p>extension works to the terminal etc. This is a wider point for all construction elements, including highways works.</p> <p>f) 5.2.62 – need to understand the changes to these areas and how emergency access provision has been taken into account.</p> <p>g) Power strategy – will there be a battery storage included in the design, this is not mentioned?</p> <p>h) WSFRS IS fully aware of the need to invest in the counties waste and recycling infrastructure, to deliver efficient and effective, management and treatment of waste within the county, and support the Government drive towards Net Zero. Therefore this plant should use ‘Best available techniques’ (BAT) to ensure that the plant</p> <p>i) delivers maximum efficiencies when recycling and processing waste materials.</p> <p>j) Nationally there have been a number of serious fires affecting these facilities impacting local communities, businesses and the environment, therefore this plants should be</p>					

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		<p>afforded the highest levels of fire protection, to ensure its safe operation, and importantly it's resilience as a key part of the waste processing infrastructure within the county.</p> <p>k) The co-location of recycling and waste processing operations often brings further efficiencies and can reduce the carbon footprint of these facilities, however careful consideration should be paid to the design of the plant, to avoid the possible escalation of a single incident and specifically a domino effect generated through the storage of large quantities of waste and recycling materials at the premises.</p>					
11.18	Emergency Planning	Query whether an increase in flight movements would lead to an increase in fuel storage? This would need further Emergency Planning work at these sites	SCC	N/A	The Project will not lead to an increase in fuel storage capacity.	N/A	
11.19	Emergency services	Query around how emergency services are being involved - for example in relation to TMP and access to East Surrey hospital	SCC	N/A	The assessment set out in ES Appendix 5.3.4 Major Accidents and Disasters considered the likelihood of change resulting from the Project's implementation rather than specific operational arrangements. During development of the detailed Construction Traffic Management Plan (CTMP), GAL and its contractor(s) will engage with the relevant highway authority (and local planning authority where relevant).	Paragraph 4.1.4 of ES Appendix 5.3.2: Code of Construction Practice, Annex 3 – Outline Traffic Management Plan [APP-085]	
11.20	Storage of hydrogen	Query around any hazard relating to the storage of	SCC	N/A	There is no specific hazard relating to storage of hydrogen in ES Appendix 5.3.4 Major Accidents	Table 5.1.2 of ES Appendix 5.3.4: Major	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		hydrogen for construction fleet if used			and Disasters however there are assessments of hazards associated with the storage and handing of general hazardous substances including flammable substances. GAL will comply with any relevant legislation and guidance in its activities. This is set out in Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters.	Accidents and Disasters [APP-089]	
11.21	Fuel Farm	Query around whether there are any changes regarding the Fuel Farm – significant as it is a COMAH site	SCC	N/A	No changes are proposed to the fuel farm as part of the NRP.	N/A	

Table 12: Health

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
12.1	PEIR Assessments	Some gaps in assessments due to lack of information at PEIR stage	JLAs	Conclusions are preliminary and will be built on at ES stage. The only significant effects identified by health and wellbeing were beneficial (for employment) (as presented at TWG 1).	The ES chapter contains the appropriate information within the ES assessment that was not available at PEIR.	ES Chapter 18: Health and Wellbeing [APP-043]	
12.2	Quantitative Assessment	Welcomes quantitative assessment of health effects associated with noise. Request more detail on the methods and data used.	JLAs	Further detail on methods provided in the ES. Best practice methods, such as those of the Institute of Public Health (IPH) will be used. It is expected that new IEMA guidance on health in EIA will be available (which is very similar to the IPH approach).	<p>Agreed that detail on the qualitative and quantitative methods have been presented to the Health TWG and that they represent an appropriate and proportionate approach.</p> <p>Some detailed points on specific coefficients are still to be confirmed, but the methods themselves are agreed.</p> <p>The methods presented included appropriate public health evidence sources including the scientific literature, and consultation responses.</p> <p>The methods follow guidance and good practice to allow a professional judgment to be reached as to the likely significant effects of the Project on population health.</p> <p>The ES chapter contains appropriate information within the health assessment on the quantitative methods and data used.</p>	<p>Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Appendix 18.4.1: Methods Statement for Health and Wellbeing [APP-205]</p>	
12.3	Incidence Rates	Request for inclusion of incidence rates within noise health analysis to provide an indication of risk magnitude.	JLAs	Incidence rates to be included in the ES quantitative health analysis.	The ES chapter includes incidence rates in the reporting of the quantitative health analyses of air quality and noise effects.	<p>Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Appendix 18.8.1: Quantitative Health Assessment Results [APP-208]</p>	
12.4	Mental Health	Welcome approach to mental health and request for issues of risk perception to include means of communicating risk to the public.	JLAs	Presentation of ES conclusions and use of non-technical summaries will support communicating issues of risk to the public.	The ES chapter includes both physical and mental health outcomes within the health assessment and includes measures to support communicating issues of risk to the public.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]	
12.5	Vulnerable Groups	Request to further consider vulnerable groups, including potential for disproportionate	JLAs	The ES coverage of vulnerable sub-populations will consider the potential for health inequalities and target mitigation accordingly. The approach will align	The ES chapter includes vulnerable sub-populations within the health assessment,	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		effects separate sensitivity conclusions and targeted mitigation.		to emerging IEMA guidance. This is expected to have separate sensitivity scores to reflect differences between the general population and vulnerable sub-populations.	considers the potential for health inequalities and targets mitigation accordingly. The approach aligns to IEMA guidance, with separate sensitivity scores to reflect differences between the general population and vulnerable sub-populations.		
12.6	Employment & Training Opportunities	Welcomes assessment of employment and training opportunities and requests targeted mitigation for disadvantaged groups.	JLAs	Targeted mitigation, including through the Outline Employment Skills and Business Strategy is being considered.	The ES chapter includes targeted mitigation for disadvantaged groups, including through the Employment Skills and Business Strategy (ESBS) (ES Appendix: 17.8.1). This is proposed to be secured through the section 106 agreement.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to socio-economic factors"</i>	
12.7	Health Service Implications	Notes further analysis of healthcare service implications of a non-home based construction workforce and Port Health statistical review	JLAs	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES. Pre-COVID Port Health data is likely to be the most relevant.	The ES chapter includes appropriate analysis of routine healthcare service implications within the health assessment. The ES includes appropriate information within the health assessment on Port Health and the project workforces, including non-home based workers, to support routine NHS strategic service planning.	This is addressed in Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> .	
12.8	Health Baseline	Request for clarifications of the health baseline, including mental health indicators and physical activity indicators.	JLAs	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to mental health.	The ES chapter includes appropriate mental health and physical activity indicators within the health assessment, as well as indicators relating to deprivation, which evidence conclusions on the sensitivity of the population and relevant sub-populations.	Section 18.5 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Baseline"</i> ES Appendix. 18.5.2: Health and Wellbeing Baseline Data Tables [APP-207] ES Appendix 18.5.1: Health Baseline Trends, Priorities and Vulnerable Groups [APP-207]	
12.9	Vulnerable Groups	Request for vulnerable groups to be more clearly discussed, including associated with age and disabilities, as well as schools and care homes.	JLAs	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to mental health.	The ES chapter includes appropriate discussion of relevant vulnerable sub-populations within the health assessment. These align with groups listed in guidance, including vulnerability due to young age, older age, income, health status, social disadvantage and access or geographic reasons.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Assessment of effects"</i>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
12.10	EQuIA	Request that an Equality Impact Assessment be undertaken.	JLAs	The ES coverage of vulnerable sub-populations and the conclusions on significance will consider the potential for health inequalities, including disproportionate or differential effects between the general population and vulnerable populations.	As GAL is not a public authority and is therefore not required to carry out an Equality Impact Assessment. However, the ES chapter includes appropriate consideration of the potential for disproportionate or differential health outcomes between the general population and vulnerable populations within the health assessment. This proportionately addresses relevant health equalities issues within the health assessment.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>“Assessment of effects”</i>	
12.11	Assessments of Effects	Request for the assessment of combined and cumulative effects.	JLAs	Combined and cumulative effects will be assessed in the ES.	The ES chapter includes an appropriate and proportionate assessment of combined and cumulative population health effects within the health assessment.	Section 18.10 of ES Chapter 18: Health and Wellbeing [APP-043] <i>“Cumulative Effects”</i> Section 18.11 <i>“Inter-Related Effects”</i> of ES Chapter 20 Cumulative Effects and Inter-Relationships [APP-045]	
12.12	Air Quality	Request for quantitative air quality health impacts by assessment year, including the difference with and without the scheme.	JLAs	Quantitative analysis will be undertaken and reported in the ES.	The ES chapter includes an appropriate quantitative analysis within the health assessment of air quality and noise effects for the relevant assessment years, including the with and without development scenarios.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>“Health and wellbeing effects from changes to air quality”.</i>	
12.13	UFPs	Request for discussion of UFPs and monitoring.	JLAs	Discussion of UFPs will be included, including on scientific literature. Separate UFP modelling is not supported by methods. Monitoring is being considered.	The ES chapter includes appropriate qualitative analysis of UFPs that summarises recent scientific literature and discusses the public health implications, including monitoring.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>“Health and wellbeing effects from changes to air quality”.</i>	
12.14	Air Quality	Concern about the non-threshold nature of some air pollutants and whether WHO guidelines should be used.	JLAs	Non-threshold health effects will be reflected in the ES health assessment. UK statutory thresholds are the health protection standard for assessment.	The ES health chapter reflects non-threshold health effects within its assessment. In judging population health significance regard should be had to WHO advisory guidelines, as one of the evidence sources. In line with planning policy and EIA guidance, UK statutory air quality thresholds are the health protection standard against which project changes should be compared. The ES chapter takes into account non-threshold health effects and WHO advisory guidelines within the health assessment.	Section 18.4 of ES Chapter 18: Health and Wellbeing [APP-043] <i>“Assessment Methodology”</i> and Section 18.8 <i>“Assessment of effects”.</i>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
12.15	Air Quality	Various requests for clarification on the air quality and noise methods, metrics and assumptions	JLAs	Covered by those technical teams and other TWGs.	<p>Agreed that the technical methods of the EIA noise assessment and EIA air quality assessment are to be agreed through their respective TWGs and not the health TWG.</p> <p>Section 18.8 “Assessment of effects” sets out health effects from changes to air quality and noise are assessed. This has been informed by ES Chapter 13: Air Quality and ES Chapter 14: Noise and Vibration which have had regard to the clarifications on methods, metrics and assumptions (as agreed with respective TWGs).</p>	Section 18.4 of ES Chapter 18: Health and Wellbeing [APP-043] “Assessment Methodology”	
12.16	Noise & vibration	Concern that noise benefits from quieter aircraft and technologies are being used up and benefits not realised by local communities.	JLAs	Using the Government's preferred metric LAeq, the airport will be quieter by 2038 than it was in 2019 even though the number of flight movements will have increased.	<p>Agreed that the extent to which the benefits of quieter aircraft and technologies are being shared by local communities is a point for agreement through the noise TWG.</p> <p>Further discussion of the With Project and DM scenarios across assessment years and compared to the 2019 baseline set out in ES Chapter 14: Noise and Vibration.</p>	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] “Health and wellbeing effects from changes in noise exposure”. ES Chapter 14: Noise and Vibration [APP-039]	
12.17	Noise & vibration	Request for the Noise Insulation Scheme to be reviewed to further offset the social cost, provide flexibility and provide local benefits.	JLAs	The Noise Insulation Scheme is already more generous than required by guidance and will continue to be considered.	Agreed that the refinement of the Noise Insulation Scheme is a point for discussion through the noise TWG.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] “Health and wellbeing effects from changes in noise exposure” which has taken the Noise Insulation Scheme into account.	
12.18	Noise & vibration	Request for night-time noise other than from flights to be considered in terms of its potential to disturb sleep.	JLAs	Air and surface noise will be assessed and reported in the ES.	<p>Agreed that the methodology and modelling results of night-time noise is a point for agreement through the noise TWG.</p> <p>Agreed that the ES health chapter includes assessment of night-time noise effects informed by the results of the ES noise and vibration chapter.</p> <p>The ES chapter includes appropriate assessment of night-time noise effects within the health assessment, informed by the results of the ES noise and vibration chapter.</p>	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] “Health and wellbeing effects from changes in noise exposure” which considers air, ground and traffic noise for daytime and night-time.	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
12.19	Assessment of Effects	Request clarification of mitigation to avoid significant effects on local healthcare facilities	JLAs	.Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	<p>Please see response provided in Row 12.7.</p> <p>Agreed that the ES health chapter assessments includes further analysis of healthcare service implications.</p> <p>The assessment presents information on Port Health and the project workforces, including non-home based workers. Such information supports routine service planning</p>	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> .	
12.20	Assessment of Effects	Request for further analysis of the impact on local primary care, A&E and the broader Integrated Care System.	JLAs	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	<p>Please see response provided in Row 12.7.</p> <p>Agreed that the ES health chapter assessments includes further analysis of healthcare service implications.</p> <p>The assessment presents information on Port Health and the project workforces, including non-home based workers. Such information should support routine service planning.</p>	See Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> where this is included.	
12.21	Assessment of Effects	Request to assess impact on community facilities and services due to temporary workers and their families.	JLAs	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	<p>Please see response provided in Row 12.7.</p> <p>Agreed that the ES health chapter assessments includes further analysis of healthcare service implications.</p> <p>The assessment presents information on Port Health and the project workforces, including non-home based workers. Such information should support routine service planning.</p>	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> where this is discussed.	
12.22	Assessment of Effects	Request to consider the impact on ambulance services and A&E	JLAs	information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	<p>Please see response provided in Row 12.7.</p> <p>Agreed that the ES health chapter assessments includes further analysis of healthcare service implications.</p> <p>The assessment presents information on Port Health and the project workforces, including non-home based workers. Such information should support routine service planning.</p> <p>The assessment takes into account effects due to passenger growth. Natural population growth is taken into account but is not within the scope of</p>	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> where this is included.	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					the assessment where it does not relate to the Project change.		
12.23	Consultation	Request for consultation with healthcare providers on potential health service impacts.	JLAs	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Update: GAL are working with NHS Sussex Integrated Care Board, including considering localised effects in Crawley. We are considering how collaboration through the project, as well as business as usual activities, can support better NHS and public health outcomes for GAL workers and the community.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i> where this is included. See also Section 18.3 <i>"Consultation and Engagement"</i> ES Appendix 18.3.1: Summary of Stakeholder Scoping Responses – Health and Wellbeing [APP-203] where further detail on consultation is provided.	
12.24	Port Health	Notes the ES will include a forecast of Port Health statistics and that this can inform healthcare planning.	JLAs	Agreed	Please see response provided in Row 12.7. The ES health chapter assessments include further analysis of healthcare service implications. The assessment presents information on Port Health and the project workforces, including non-home based workers. Such information should support routine service planning.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i>	
12.25	Assessment of Effects	Request for consideration of how hospital admissions correlate with passenger numbers.	JLAs	Current information shows the relationship is more complex than just number of passengers.	Please see response provided in Row 12.7. The ES health chapter assessments include further proportionate consideration of the relationship between hospital admissions and passenger numbers, based on available data.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes to local healthcare capacity"</i>	
12.26	Assessment of Effects	Request for further analysis of the impact on healthcare of natural population growth.	JLAs	Socio-economic assessment is considering population growth. Taxation funding of public services will be discussed in the ES.	It is agreed that natural population growth is taken into account by the ES but is not within the scope of the health assessment where it does not relate to the project change.	N/A	
12.27	Open Space	Request for more detail on open spaces reprovision and	JLAs	Consideration is being given to connecting new and existing open spaces and providing benefits.	The details of the mitigation should be discussed with the health TWG in due course.	Section 18.8 of ES Chapter 18: Health and	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		how it benefits local communities including providing contiguous access.			The ES chapter includes appropriate assessment of open spaces re-provision within the health assessment, including the anticipated benefits to local communities from greater areas of public open space and contiguous access.	Wellbeing [APP-043] <i>"Health and wellbeing effects from changes in lifestyle factors"</i> . Further detail is also set out in ES Chapter 19: Agricultural Land Use and Recreation [APP-044].	
12.28	Lighting Issues	Concern about the effects on the A23 along Riverside Garden Park in terms of lighting impacts, including from night working.	JLAs	Lighting impacts assessed in the ES and unlikely to have significant population health implications	The ES health chapter assessments include assessment of lighting impacts, including in relation to Riverside Garden Park. The ES chapter includes appropriate assessment of lighting impacts within the health assessment, including in relation to Riverside Garden Park.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes in exposure to light"</i> .	
12.29	PRoW	Notes the health baseline for the area highlights physical activity opportunity as important and this should be taken into account in relation to impacts to Riverside Garden Park and National Cycle Route 21.	JLAs	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to physical activity levels.	Agreed that the health baseline for the area highlights physical activity opportunity as important and this should be taken into account in relation to the ES health chapter assessment of impacts to Riverside Garden Park and National Cycle Route 21. The ES chapter includes appropriate baseline indicators and takes into account the importance of physical activity opportunity in the health assessment, including impacts to Riverside Garden Park and National Cycle Route 21.	Section 18.5 <i>"Baseline"</i> and ES Appendix 18.5.2 Health and Wellbeing Baseline Data Tables [APP-206] which contains health baseline indicators relating to physical activity. Section 18.8 <i>"Assessment of effects"</i> where impacts to Riverside Garden Park and National Cycle Route 21 are considered across several health determinants.	
12.30	Assessment of Effects	Request for the impacts of additional road accident risk to be considered.	JLAs	Risks are addressed through the highway design and will be assessed in the ES.	Agreed that the methodology and modelling results of road accident risk is a point for agreement through the transport TWG. Agreed that the ES health chapter should include assessment of road accident risk effects informed by the results of the ES traffic and transport chapter.	Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] <i>"Health and wellbeing effects from changes in transport nature and flow rate"</i> .	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					The ES chapter includes appropriate assessment of road accident risk effects informed by the results of the ES traffic and transport chapter.		
12.31	Overall scope	Clarifications were requested on the scope of the assessment, including on vulnerable groups and UFPs	JLAs	N/A	Overall: The scope of the ES chapter is agreed.	The scope of ES Chapter 18: Health and Wellbeing [APP-043] is as agreed. See Section 18.8 “Assessment of Effects”.	
12.32	Overall baseline	Clarifications were requested on baseline	JLAs	N/A	Overall: The baseline of the ES chapter is agreed.	The baseline of ES Chapter 18: Health and Wellbeing [APP-043] Section 18.5 “Baseline” and ES Appendix 18.5.2 Health and Wellbeing Baseline Data Tables [APP-206].	
12.33	Overall receptors	Clarifications were requested on receptors, including coverage of vulnerable groups	JLAs	N/A	Overall: The receptors of the ES chapter are agreed.	The receptor populations of ES Chapter 18: Health and Wellbeing [APP-043] are set out in Section 18.4 “Assessment Methodology”.	
12.34	Overall methods	Clarifications were requested on the methods of assessment	JLAs		Overall: The methods of the ES chapter are agreed.	The methods of ES Chapter 18: Health and Wellbeing [APP-043] are as agreed. See Section 18.4 “Assessment Methodology” and ES Appendix 18.4.1 Methods Statement for Health and Wellbeing [APP-205].	
12.35	Overall mitigation	Clarifications were requested on mitigation	JLAs	N/A	Overall: The mitigation of the ES chapter are agreed.	Further information is now set out in Section 18.7 of ES Chapter 18: Health and Wellbeing [APP-043] “Mitigation and Enhancement Measures Adopted as Part of the Project”, and	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Section 18.8 "Assessment of Effects".	
12.36	Overall conclusions	Agreement on the conclusions of the ES Chapter 18: Health and Wellbeing assessment was previously reserved pending receipt of the final ES.	JLAs	N/A	Overall: The conclusions of the ES chapter are agreed.	Conclusions of ES Chapter 18: Health and Wellbeing [APP-043] are set out in Section 18.8 "Assessment of Effects", Section 18.10 "Cumulative Effects" and Section 18.11 "Inter-Related Effects".	
12.37	Vibration Impacts	Noise impacts to include vibration impacts	ESCC	N/A	The ES chapter includes appropriate assessment of vibration effects within the health assessment, informed by the results of the ES noise and vibration chapter.	Agreed vibration is also relevant and references to noise did not make this explicit. See Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043] "Health and wellbeing effects from changes in noise exposure" which considers noise and vibration. Vibration is particularly relevant to the construction period. Vibration impacts are discussed in greater detail in ES Chapter 14: Noise and Vibration [APP-039].	
12.38	Blue Light Services	With an increase in flights (and passengers) need to consider the impact on blue light services as well as on 'health services' etc. To cover major incidents.	ESCC	N/A	As for 12.7 for coverage of routine healthcare, including ambulance and A&E services. Other blue lights services and major incidents (i.e. Major Accidents and Disasters) are outside the agreed scope of ES Chapter 18: Health and Wellbeing. Issues relating to Major Accidents and Disasters are captured in Table 11.	The Scoping Opinion is provided in ES Appendix 6.2.2 Scoping Opinion [APP-095]. "The Inspectorate is content that any effects on construction and operational works from major accidents and disasters will be considered as part of the assessment of Major Accidents and Disasters	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						<p><i>and can be scoped out of the health and wellbeing assessment.”</i></p> <p>IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment, paragraph 5.5 “<i>The ... health section may refer to issues that are scoped-out due to their coverage within other permitting or risk management processes. For example, that ‘occupational health and safety’, ‘emergency planning’ or ‘port health’ issues are addressed by relevant regulation and that this does not require further consideration beyond noting that it helps to mitigate community healthcare implications.”</i></p>	
12.39	Supporting Infrastructure	<p>Greater clarity is needed on justification for supporting infrastructure:</p> <ol style="list-style-type: none"> 1) the assessment of the ‘waste’ facility, including proposed technology; 2) clarity on the suggested socioeconomic benefits, including the number, type, quality, and location of jobs created; 3) the link between current labour supply and jobs created, and local economic benefits; 	ESCC	N/A	<p>The ES chapter includes appropriate information on the matters raised within other technical chapters that have been signposted, including in relation to the CARE facility, socio-economic effects, air quality effects, noise effects, traffic and transport effects, green-house gas effects and climate change effects.</p> <p>The ES chapter has, though the health assessment as well as other assessments, included appropriate and proportionate enhancement measures, including that are targeted to vulnerable groups.</p> <ol style="list-style-type: none"> 1) The waste facility (Central Area Recycling Enclosure (CARE) facility) building has been assessed as one of the on-site 	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>Paragraphs 5.2.50 to 5.2.53 of ES Chapter 5 Project Description [APP-030]</p> <p>ES Chapter 13: Air Quality [APP-038]</p> <p>Annex 4 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		4) the need for new homes and associated infrastructure; 5) concerns relating to traffic and transport, including assumptions about mode share for both passengers and staff; 6) impacts on noise and air quality from both construction and operational phases; 7) concerns about greenhouse gas emissions and impacts on climate change, 8) and understanding how airport expansion can be justified given national and international carbon reduction targets; and 9) the need for enhancement measures.			<p>buildings and processes that make-up the airport. This is part of the models and assessments of the other ES topics, the residual effects of which are inputs to ES Chapter 18: Health and Wellbeing. Detail on the CARE facility is set out in ES Chapter 5 Project Description paragraphs 5.2.50 to 5.2.53. Relevant assessment of emissions can be found in ES Chapter 13: Air Quality.</p> <p>2) Information on the profile and distribution of jobs is set out in detail in Annex 4 of ES Appendix 17.9.2: Local Economic Impact Assessment. That information has informed ES Chapter 17: Socio-economic Effects which is proportionately summarised in ES Chapter 18: Health and Wellbeing, Section 18.8 “Assessment of Effects”.</p> <p>3) Current labour supply information is set out in the baseline of ES Chapter 17: Socio-economic Effects, Section 17.6 and Appendix 17.6.1 ‘Socio-Economic Data Tables’. Jobs created and local economic benefits are set out in ES Chapter 17: Socio-economic Effects, Section 17.9 ‘Assessment of Effects’, which is proportionately summarised in ES Chapter 18: Health and Wellbeing, Section 18.8 “Assessment of Effects” in terms of the public health implications.</p> <p>4) Information on the assessment of population and housing effects is set out in ES Appendix 17.9.3 Assessment of Population and Housing Effects, which has informed ES Chapter 17: Socio-economic Effects, Section 17.9 ‘Assessment of Effects’.</p> <p>5) Traffic and transport, including assumptions, including mode share are set out in ES Chapter 12 Traffic and Transport. As set out in that chapter, the mode share and monitoring commitments are set out in the ES Appendix 5.4.1:</p>	<p>ES Chapter 17: Socio-economic Effects [APP-042]</p> <p>Annex 4 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200]</p> <p>ES Chapter 12 Traffic and Transport [APP-037]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>ES Appendix 14.9.10 Noise Insulation Scheme [APP-180]</p> <p>ES Chapter 13: Air Quality [APP-038]</p> <p>ES Chapter 14: Noise and Vibration [APP-039].</p> <p>ES Chapter 15 Climate Change [APP-040]</p> <p>ES Chapter 16 Greenhouse Gases [APP-041]</p> <p>ES Appendix 17.8.1: Employment Skills and Business Strategy [APP-198]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>Surface Access Commitments. GAL is committed to producing Annual Monitoring Reports (AMR). If the AMR shows that the mode share commitments are not met, the SACs document set out the remedial actions that would be taken.</p> <p>6) Impacts on noise and air quality from both construction and operational are set out in ES Chapter 13: Air Quality and ES Chapter 14: Noise and Vibration.</p> <p>7) Impacts on greenhouse gas emissions are set out in ES Chapter 16 Greenhouse Gases and impacts on climate change are set out in ES Chapter 15 Climate Change.</p> <p>8) National carbon reduction targets (UK Carbon Budgets) are discussed in ES Chapter 16 Greenhouse Gases. ES Chapter 15 Climate Change also provides context on The Climate Change Act 2008.</p> <p>9) ES Chapter 18: Health and Wellbeing [has contributed to the application including enhancement measures targeted to vulnerable groups, see section 18.7 'Mitigation and Enhancement Measures Adopted as Part of the Project'. These include additional measures secured in the Noise Insulation Scheme, Appendix 14.9.10, and the Employment Skills and Business Strategy, ES Appendix 17.8.1: ESBS. Further information is set out in ES Chapter 18: Health and Wellbeing, Table 18.7.1.</p>		
12.40	Health Assessment	We expect to see cumulative and combined effects on the health of specific populations clearly assessed - Charlwood and Horley	SCC	N/A	<p>Please see response provided in Row 12.11.</p> <p>The receptor populations of ES Chapter 18: Health and Wellbeing are set out in Section 18.4 "Assessment Methodology". The study areas are defined, including how regard has been had to the zones of influence of other ES topic assessments. Paragraph 18.4.9 explains how the study areas are used to determine population sensitivity, not define boundaries on the extent of all health effects. This is in line with guidance as explained in that paragraph. To provide a proportionate</p>	<p>The receptor populations of ES Chapter 18: Health and Wellbeing [APP-043] are set out in Section 18.4 "Assessment Methodology".</p> <p>A proportionate cumulative assessment has been undertaken and is set out in ES</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>assessment of small area effects, paragraph 18.4.10 explains that a 'site specific' study area is used based on the 9 wards closest to the airport. This area is based on a realistic worst-case population sensitivity, such that even if the exact geographies or impact extents vary, this would still represent a conservative assessment. The wards that have informed the assessment conclusion that the population sensitivity should be rated as high (the highest level of sensitivity) includes the wards of Charlwood (E05007317), Horley West & Sidlow (E05012878), and Horley Central & South (E05012876).</p> <p>A proportionate cumulative assessment has been undertaken and is set out in ES Chapter 18: Health and Wellbeing, Section 18.10 'Cumulative Effects'. This assessment is ordered by determinant of health and considers if effects due to other projects would alter the conclusions of the main assessment (Section 18.8). The same population groups as for the main assessment apply in the cumulative assessment of each health determinant. This includes the site-specific population around the airport. It would not be proportionate to assess and report on a ward-by-ward basis. Even if this were the case it would be the same conclusion as set out in Section 18.10.</p> <p>Similarly, a proportionate inter-related effects assessment has been undertaken and is set out in ES Chapter 18: Health and Wellbeing, Section 18.11 'Inter-related Effects'. This assessment looks at the combined effects of changes in different determinants of health for a given population group, including the site-specific population around the airport. It would not be proportionate to assess and report on a ward-by-ward basis. Even if this were the case it would be the same conclusion as set out in Section 18.11 for the site-specific population.</p>	<p>Chapter 18: Health and Wellbeing [APP-043] Section 18.10 'Cumulative Effects'.</p> <p>A proportionate inter-related effects assessment has been undertaken and is set out in ES Chapter 18: Health and Wellbeing [APP-043] Section 18.11 'Inter-related Effects'.</p>	

Table 13: Noise and Vibration

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.1	Air Noise	GAL should ensure that any and all documents relevant to the consideration of the ES are supplied promptly, properly curated and in a format that facilitates processing of the information by the receiving parties. Early and meaningful engagement should be commenced with the joint authorities in relation to the ES and that timescale for processing and responding to the consultation are agreed with the joint authorities.	JLAs	GAL will ensure that all documents relevant to the consideration of the ES are supplied to the local authorities promptly, and in suitable formats. GAL intends to engage with the Noise Topic Group as the noise and vibration assessment progresses to discuss the key areas of concern arising from the PEIR so as to progress to the ES with agreement of the joint authorities wherever possible.	GAL has shared noise data with LPA officers via the online noise viewer on 7th March 2023. GAL presented an overview of the DCO noise documentation to the TWG on 22 September 2023.	<p>ES Chapter 14: Noise and Vibration (APP-039).</p> <p>Environmental Statement - Appendix 14.3.1 Summary of Stakeholder Scoping Responses - Noise and Vibration (APP-169)</p> <p>Environmental Statement - Appendix 14.3.2 Summary of PEIR and Updated PEI Responses - Noise and Vibration (APP-170)</p> <p>Environmental Statement - Appendix 14.9.1 Construction Noise Modelling (APP-171)</p> <p>Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)</p> <p>Environmental Statement - Appendix 14.9.3 Ground Noise Modelling (APP-173)</p> <p>Environmental Statement - Appendix 14.9.4 Road Traffic Noise Modelling (APP-174)</p> <p>Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175)</p> <p>Environmental Statement - Appendix 14.9.6 Ground Noise Baseline Report (APP-176)</p> <p>Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)</p> <p>Environmental Statement - Appendix 14.9.8 Noise</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Envelope Group Output Report (APP-178) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180) Environmental Statement – ES Appendix 5.3.2 Code of Construction Practice (APP-082) ES Figures 14.9.1 to 14.4.2 to 14.9.57 (94 in total)	
13.2	Air Noise	To prevent and minimise ground noise and air noise impacts on communities to the North, any Northern Runway usage is limited to operations between 07:00 to 23:00 and is only used during the day for Chapter 3 aircraft or quieter.	JLAs	The proposal is to use the Northern Runway between 06:00 and 23:00 hours to meet the requirements of the project. All aircraft at Gatwick are Chapter 3 or quieter.	N/A	Paras 14.2.45 of ES Chapter 14: Noise and Vibration (APP-039). Requirement 19(3) of Schedule 2 to the draft DCO (APP - 006).	
13.3	Air Noise	CBC welcome the use of the more sensitive N60 and N65 criteria and this has exposed an issue that would previously have been obscured with the conventional noise contours. To improve understanding of the use of the air space we recommend that the changes to fleet mix and assumptions about departure (and arrival routes) are included to facilitate understanding of the impact of this change as highlighted in the Leq, T and N above metrics.	JLAs	Noted, the N65 contours are effective at showing the noise footprint of the additional daytime air traffic expected to use the WIZAD Route 9 in the Northern Runway cases which is the same proportion as in the future base cases. PEIR Appendix 4.3.1 provides air traffic forecasts and fleet mix. The proportion of air traffic assigned to each route will be reported in the ES. The proportions vary slightly from year to year as traffic varies. There are no plans to use WIZ at night.	N/A	Diagram 2.1.1 of ES Appendix 14.9.2: Air Noise Modelling (APP-172) provides the distribution of flights cross departure routes.	
13.4	Air Noise	GAL is requested to review the scheme of mitigation and compensation and provide updated proposals having regard to the thresholds of qualifying for grants by applying good acoustic design and the policy of wherever possible improving an area as a result of NRP. This would still allow the	JLAs	GAL has considered the thresholds for noise mitigation carefully and proposed to offer noise insulation at levels below the DfT guidance, i.e. making the scheme more generous than others. The two zone scheme also provides a higher level of mitigation to these worst affected which GAL feels is appropriate. We welcome views on the	An enhanced NIS is to be introduced as part of the Project, with details included in ES Appendix 14.9.10: Noise Insulation Scheme.	Section 14.8 of ES Chapter 14: Noise and Vibration (APP-039). ES Appendix 14.9.10: Noise Insulation Scheme (APP-180)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		airport to increase profitability and in part offset the social cost of the development. As part of this the noise exposure contours are to be produced with the airport operating in single mode to examine worst case daily exposure on a peak summer day and night (for Leq,T and N, above).		details of this scheme and will work with stakeholders to develop those details including through discussions at the Noise Envelope Group. We have provided 100% easterly and 100% westerly operations noise predictions for ground noise, and operations noise predictions for air noise at the Community Representative Locations (See Appendix 14.2 Section 2, and discussion in para 14.9.67 to 14.9.84) however, these are provided for additional information and not used in the assessment of effects because the accepted criteria for judging those effects are the long-term average not the noise levels on a selection of the days when operations are only easterly or westerly.			
13.5	Air Noise	The ES should be updated to take account of likely or actual changes to airspace or options that are proposed by FASI.	JLAs	At the current time FASI-S has not developed likely airspace change options that can be assessed. We will keep this under review, and if likely new routings become available in time ahead of the DCO submission, these will be considered and assessed if sufficient information permits.	N/A	Para 14.5.7 of ES Chapter 14: Noise and Vibration (APP-039)	
13.6	Air Noise	Sensitivity testing of different growth rate scenarios would help provide a better understanding of how noise may affect local communities in future. It is expected that this sensitivity testing would be provided in the ES.	JLAs	The range of noise impacts as air traffic builds on the Northern Runway is demonstrated by the different assessment years modelled. If growth is slower impacts will be lower. GAL do not propose to assess lower traffic levels for the scheme.	N/A	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)	
13.7	Air Noise	Sufficient information in the ES should be provided on air noise modelling to understand the processes behind it. Information on air noise modelling should be provided, including noise measurements used to validate the noise model, the validation process, weather data, fleet forecasts and departure route splits.	JLAs	A description of the CAA's ANCON model will be added to appendix 14.9.2 along with suitable references for the interested reader. A technical description of ANCON is provided in R&D Report 9842. ATM forecasts are provided in the PEIR appendix 4.3.1. Weather data is widely available from public sources. The proportional usage of routes will be included in the ES. ERCD are preparing a technical appendix on the ANCON model and its verification at Gatwick Airport that will be presented in a later TWG meeting.	ERCD, CAA gave a presentation to the TWG on 7th June 2022 on the ANCON model and its validation, and it was discussed at the TWG. The slide deck was provided. Further information has been added to the ES including departure route splits in Appendix 14.9.2.	Section 2, ES Appendix 14.9.2: Air Noise Modelling (APP-172)	
13.8	Air Noise	In terms of the noise insulation scheme it is suggested that the outer zone offer may be more flexible so properties that either already have ventilation or are unable to have	JLAs	It is expected that very few dwellings already have acoustic ventilation or unable to have it fitted. Details of the final Noise Insulation Scheme will be discussed with the Noise Topic Working Group.	An enhanced NIS is to be introduced as part of the Project, with details included in ES Appendix 14.9.10: Noise Insulation Scheme.	ES Appendix 14.9.10: Noise Insulation Scheme (APP-180)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		ventilation fitted can benefit it an alternate way.					
13.9	Air Noise	Air noise - it would be helpful if the slower transition fleet case was considered separately to the central case assessment as a sensitivity test.	JLAs	Reporting of the air noise assessment has been structured to allow the reader to understand the range of noise impacts that could arise between the more likely Central Case fleet and the Slower Transition fleet which could yet still occur, as discussed in Section 3 of Appendix 14.9.5. The Slow Transition Fleet forms the basis of the noise envelope that is proposed and guarantees that the airport will be quieter in future years than it was in 2019.	N/A	Section 3 of Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175)	
13.10	Air Noise	2029 Air noise assessment - given that there are 37 more movements in the central case scenario, it should be clarified in the ES as to how there is a reduction in population exposed to noise levels exceeding the daytime LOAEL in the 2029 scenario.	JLAs	Noted in 2029 the increase in ATMs is small, only 37 a day, as a result of the Project (whereas in the 2032 assessment year the increase is 158). In 2029 the contour area increase is small, from 120.1 km ² in the 2029 base to 126.0 km ² in 2029 with the Project. Normally a larger contour gives a larger population, but in this case the contour also shifts slightly northwards as air traffic moves from the main runway to the Northern Runway which reduces the contour area to the south that encompasses the highly populated area of Forge Wood, creating a slight net reduction in population. This is not so in 2032 or 2038. This will be noted in the ES.	This explanation has been added to ES Chapter 14 Noise and Vibration.	Para 14.9.90 of ES Chapter 14: Noise and Vibration (APP-039)	
13.11	Air Noise	A population of 4,800 to 6,500 people are predicted to experience an increase in noise of 1-2 dB, and it is recommended that primary and supplementary noise metrics are presented in the ES to allow easy correlation for affected communities.	JLAs	Paragraph 14.9.50 to 14.9.56 summaries the results of modelling using the supplementary noise metrics, and figures 14.9.13 to 14.9.21 illustrate the noise contours including changes to N65 and N65. Recognizing that individuals may wish to understand how all the primary and secondary noise metrics will be changed by the Project in their locations, the results for all metrics are presented for the 7 Community Representative Locations, as discussed in paragraphs 14.9.76 to 14.9.84 and provided in full in Tables 14.2.1 to 14.2.14 in Appendix 14.9.2. These 7 Community Representative Locations were chosen to be in the center of the most populated areas so that the majority of individuals within the noise contours could refer to one of them to provide approximate results at this level of detail in their area.	Paragraph 14.9.100 of Chapter 14 describes the effects for this group of people. Section 2 of ES Appendix 14.9.2: Air Noise Modelling provides 14 tables for the 7 representative locations giving all primary and secondary metrics for easy comparison.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.12	Air Noise	Definition of an air noise study area in the ES would help identify additional community locations to be included for additional study in the ES. These receptors should be identified in the baseline section.	JLAs	Paragraph 14.4.15 notes how the study area for air noise includes all receptors that may experience potential adverse impacts. For example, for some air noise metrics, this area extends more than 20 km from the airport. The 7 Community Representative Locations were chosen to cover this area for the PEIR. If consultation concludes that in order to understand the significant effects of the project further Community Representative Locations are required, that will be considered for the ES.	The study area has been clarified in the ES.	Para 14.4.15 of ES Chapter 14: Noise and Vibration (APP-039)	
13.13	Air Noise	GAL are proposing the use of a daytime LOAEL of 51 dB LAeq 16 hr and night-time LOAEL of 45 LAeq 8 hr based on the DfT's Survey of Noise Attitudes (SoNA) study. However, both of these levels are significantly above levels recommended by the WHO for aviation noise in general, and at night.	JLAs	The PEIR explains the choice of the Lowest Observable Adverse Effects Level across several paragraphs from 14.4.57, where it is explained that the LOAELs used accord with those provided in the Consultation Response on UK Airspace Policy: A Framework for Balanced Decisions on the Design and Use of Airspace (Department for Transport, 2017b). Earlier in the PEIR, there is an explanation for why the adoption of WHO Guidelines was not considered appropriate. 14.2.39 explains that the WHO 2018 Environmental Noise Guidelines are based on a detailed review of the literature from 1999 to 2015. In the case of aircraft noise, the scatter in the dose/response relationships is considerable, but a single dose response is offered for each health effect with associated target levels for aircraft noise in terms of the European annual average noise metrics Lden and Lnight. However, in Section 5, Implementation of the Guidelines, the WHO note: 'Furthermore, cultural differences in what is considered annoying are significant, even within Europe. Therefore, it is not possible to determine the "exact value" of % HA [highly annoyed] for each exposure level in any generalized situation. Instead, data and exposure-response curves derived in a local context should be applied whenever possible to assess the specific relationship between noise and annoyance in a given particular situation.' Paragraph 14.2.40 goes on to explain the importance of the Survey of Noise Attitudes (SoNA) study undertaken for the UK Government.	The day and night noise levels for the Noise Envelope limits have been discussed extensively in the Noise Envelope Group.	Paragraph 14.2.49 to 14.2.52, and 14.4.45 of ES Chapter 14: Noise and Vibration (APP-039)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				SONA assessed annoyance in the UK and reported in 2017, after the cut-off date for studies considered in the WHO report. The SoNA study gives the local annoyance response relationship relevant to the UK. It shows, in the UK, about 7% of the population in 2014 was annoyed by aircraft noise at Leq, 16 hour 51 dB, and the Department for Transport has hence adopted this as the LOAEL. It should also be noted that the following UK airport development Environmental Statements have used the same day and night period LOAELs and SOAELs as the PEIR: Bristol Airport (2018), London City Airport (2015), Manston Airport (2018), Southampton Airport (2019), Leeds Bradford Airport (2020), Luton Airport 2021).			
13.14	Air Noise	For those within the inner zone of the proposed scheme it is important to realise that the measures being proposed are primarily to mitigate the noise impacts in the summer months, and in many cases geared around glazing solutions. As a consequence, the insulation scheme should also include works to prevent solar gain at the property and look at measures to actively cool the properties affected in view of the fact that UK summers are forecast to get hotter both by day and night.	JLAs	The Inner zone scheme includes blinds to address solar gain for this reason and acoustic ventilators to all noise sensitive rooms. The NIS for the inner zone is intended to provide a high level of insulation to those worst affected by aircraft noise. Details will be developed ahead of the DCO. We propose to work with the Noise Envelope Group to develop the final NIS policy.	An enhanced NIS is to be introduced as part of the Project, with details included in ES Appendix 14.9.10: Noise Insulation Scheme.	Para 4.1.9 of ES Appendix 14.9.10: Noise Insulation Scheme (APP-180)	
13.15	Air Noise	Justification should be provided in the ES as to how provision of insulation would help avoid significant air noise effects.	JLAs	Provision of noise insulation to allow significant effects to be avoided has longstanding precedent in case law. The PEIR explains this in paragraph 14.8.30 with an example reference to the Cranford Appeal in Footnote 7.	Text has been included within the ES that provides justification.	Para 14.2.56 and 14.9.162 to 14.9.171 of ES Chapter 14: Noise and Vibration (APP-039).	
13.16	Air Noise	Noise envelope - if the 'central case' is considered to represent an achievable rate of fleet transition, it is recommended that noise contour area limits are based on 'central case' noise predictions: Details on how the benefits of new aircraft technologies are shared between the applicant and local communities should be provided; Expected that a mechanism is adopted to allow for further reductions in the contour area limits to provide further community benefits with	JLAs	These suggestions will be further discussed by the Noise Envelope Group.	Extensive discussions on these elements of the Noise Envelope took place in the Noise Envelope Group and TWG in summer 2022 and informed the proposed noise envelope presented in the DCO application.	Engagement on the Noise Envelope is set out in ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179). Page 165 to 175 provide GAL's illustration of sharing the benefits. Page 252 provides GAL's comments on a Community Noise Groups	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		technology improvements in the future; Information should be provided in the noise envelope on what actions would be taken in the event of an exceedance of the noise envelope limits; Details on the enforcement regime should be provided; More detail on how potential compliance with contour limits will be achieved would be beneficial and help provide reassurance that exceedances of noise contour limits can be avoided; Existing restrictions on night flights, would expect to see these explicitly defined in the noise envelope; Recommended that consultation is undertaken with local communities and relevant stakeholders to discuss the contents of the noise envelope; discussions should allow the opportunity local communities and relevant stakeholders to submit recommendations for noise envelope contents to GAL.				analysis of sharing the benefits. ES Appendix 14.9.5: Air Noise Envelope Background explains the Slow Transition Case and its application in the Noise Envelope. ES Appendix 14.9.7: The Noise Envelope (APP-177) explains these features of how the noise envelope will be managed.	
13.17	Air Noise	Noise Envelope (CAP 1129) - At present the airport's current proposals appear to fall sort on all of the above tests. In the design of the proposals there has been no consultation with the local community or relevant stakeholders in defining the design of the envelope, which is in stark contrast to the work that has gone on at Heathrow.	JLAs	The Northern Runway PEIR consultation is the beginning of the process to consult with all stakeholders on the noise envelope proposal. We plan to discuss our proposals further with interested stakeholders and develop the noise envelope for inclusion in the DCO application. Local Authority Environmental Health Practitioners will be invited to join the Noise Envelope Group to help GAL develop the Noise Envelope in the coming months.	The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) explains that a total of 12 two-hour meetings dedicated to the NEG process were held between 26 May and 11 October 2022 between the airport and stakeholders. A summary of wider consultation undertaken since 2019 is also provided at Section 4.2 of Appendix 14.9.7 The Noise Envelope (APP-177)	ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) Section 4.2 of Appendix 14.9.7 The Noise Envelope (APP-177)	
13.19	Air Noise	It is considered that the proposed 51db Leq 16 hour day and 45db 8 hour Leq night contours are insufficiently precise due to modelling limitations. The choice of these contours appears to be based on their stated LOAEL. However, this is a matter of compliance not health. A stronger and more accurately measured and modelled metric would be a 54db day time contour as this would give a more precise control. Night time	JLAs	We note your concern about the accuracy of Leq 16 hr contours, however, we are assured by the CAA that levels of 51dB are reliably modelled by their ANCON model for Gatwick. Joseph Lee (JL) of ERCD gave an overview of the ANCON model at TWG2 then explained how the model was validated at Gatwick using NTK data in particular to ensure that the modelled aircraft height, speed and noise level profiles matched those measured at Gatwick along arrivals and departure routes. He explained how SEL and Lmax levels are	N/A	ES Appendix 14.9.2: Air Noise Modelling	

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		controls require more consideration and are outside the scope of this response.		generated within the model and adjusted to fit the levels measured in the ground. We feel it is important to relate the envelope to the DFT guidance on the Lowest Observable Adverse Effects Levels.			
13.20	Air Noise	Raise concern regarding the lack of consideration of impacts on communities to the east of the airport, particularly Burstow, Smallfield, Lingfield and Dormansland. This is further felt at night due to the highest levels of night flights of any UK airport, except East Midlands. The effects of prevailing winds and travelling noise seems to have been focused to the west of the airport with little consideration of the experiences of current residents to the east who have first-hand knowledge of how the existing airport operations impact them. It is requested that the methodology and technical details regarding this be revisited.	JLAs	The assessment of noise impacts considers all areas of potential noise impact equally, eg mapping noise across this area and discussing noise changes in Section 14.9. Lingfield is chosen as one of the Community Representative Locations for detailed analysis. However, because the northern runway will be used for departures only, and on approximately 75% of the year this area of concern is overflowed by arrivals which will not be moved by the northern runway, the noise changes are smaller in this area.	The assessment of noise impacts reported in the ES considers all areas of potential noise impact equally.	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039).	
13.21	Air Noise	Communities that live under the flight paths of the Airport are already affected by air noise. Increases in the number of flights will mean more disturbance events. Even if each noise incidence is quieter when accounting for newer technology in the future, the impact of multiple aircraft can have adverse effects. The proposals suggest that communities in the north of Sussex, that have little or no noise exposure at present, will be exposed to regular and frequent aircraft noise in the future, which is of concern.	JLAs	The Northern Runway Project does not require any change to flight paths over north Sussex, so we do not expect communities with no noise at present to be exposed to aircraft noise in this area.	See response to issue reference 13.116 below	Para 14.5.7 of ES Chapter 14: Noise and Vibration (APP-039).	
13.22	Air Noise	The following points (data gaps and/or inconsistencies) provide an overview of the main issues: Baseline noise data from 2016 survey is not presented; Information on aircraft fleets, movement numbers and track usage for the assessment scenarios are not provided; No noise data from the Gatwick Airport Noise and Track Keeping system is presented in the PEIR; There is a lack of detail on the noise modelling methodology and validation using data from the Noise and Track Keeping system; No details on weather	JLAs	The 2016 baseline survey results are summarized in Table 14.6.4 and described in detail in section 2 of Appendix 14.9.3 The 2016 Baseline noise report will be provided. Aircraft movements numbers are provided. The noise assessment carried out for the PEIR assumes the distribution of flights across routes remains largely unchanged except a slight increase in use of the WIZAD route, in the base case and with the Northern Runway Project in future years. Paragraph 14.4.19 describes how NTK data is used by the CAA to calibrate the noise model, thought it was	The 2016 ground noise survey is presented in Appendix 14.9.6 Ground Noise Baseline Report (APP-176). See 13.19 above for noise modelling references. The overflight grid sizes has been reduced to 1km to improve resolution. See para 2.2.9 of ES Appendix 14.9.2: Air Noise Modelling.	Appendix 14.9.6 Ground Noise Baseline Report (APP-176). Para 2.2.9 of ES Appendix 14.9.2: Air Noise Modelling.	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		conditions applied in noise modelling are provided; Overflights are presented in a 3.6x3.6km grid, so not considered to be of sufficient resolution for any meaningful analysis.		not thought to be useful to include that data. Further details are available in ERCD Report 2002 Noise Exposure Contours for Gatwick Airport 2019. It is not clear why weather data is of interest, given the presumption that the weather in the future will be as it is today for the purposes of noise modelling. Table 14.12.1 provides details of overflights changes expected at two Landscape Assessment locations in East Sussex, Firle Beacon and Ditchling Beacon, at which the increase in overflights as a result of the project are estimates as 1-2 more flight per day. Further work will be done on overflight for presentation in the ES including considering refining the grid size if necessary.			
13.23	Ground Noise	GAL need to undertake a noise assessment on fixed plant items to inform the localised impacts of the development and need to do so at an early stage within the Environmental Statement to assist in finalising the proposed layout.	JLAs	This has been discussed within the Noise Envelope Group, and we confirm it is the intention that noise assessments on fixed plant will be undertaken. The assessment requires a sufficient level of detail in terms of the likely locations of, and design of plant items which should become available in the coming weeks. We anticipate that noise control measures can be incorporated into the design if necessary to avoid significant noise impacts.	Noise emissions from fixed operational facilities is assessed using the BS 4142 method, in Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039). Details of the ground noise assessment are provided in Section 7 of ES Appendix 14.9.3: Ground Noise Modelling	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039). Section 7 of ES Appendix 14.9.3: Ground Noise Modelling	
13.24	Ground Noise	Information on the following should be provided in the ES: Sound power levels applied to APUs; Sound power levels applied to engine ground running; Details on how LAmx noise levels have been calculated.	JLAs	The sound power level used for calculating the maximum noise level produced by APUs is the same as has been presented in previous ground noise models at the airport as follows: A sound power of 116.7 dB Lw (representative of a Boeing 747 size aircraft) has been used to calculate the maximum noise level from all stands due to APU usage. This is a conservative worst-case model as in reality some of the stands cannot accommodate aircraft of this size and the smaller APU associated with smaller aircraft would have a lower sound power level.	The sound power level are provided in Table 3.1.1 of ES Appendix 14.9.3: Ground Noise Modelling	Table 3.1.1 of ES Appendix 14.9.3: Ground Noise Modelling.	
13.25	Ground Noise	MVDC recommends that GAL carries out a comprehensive exercise of night time monitoring to provide representative background night time noise measurements against which any new plant can be assessed in accordance with the BS4142 noise rating assessment. Ideally, the	JLAs	These points were discussed and responses provided in the Noise Topic Group meeting on 2nd November 2021. It will not be possible to produce baseline noise contours around the airport perimeter given the complexity of the neighbouring noise environment comprising a variety of non-airport noise sources as well as	The validity of this baseline survey in 2023 is discussed in paragraph 14.6.20 ES Chapter 14: Noise and Vibration (APP-039).	ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176). Paragraph 14.6.20 ES Chapter 14: Noise and Vibration (APP-039)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		representative background noise should be captured as a night time ground based contour mapping exercise and provided in the PEIR to help identify suitable noise targets for the design of future plant.		airport ground and air noise. Instead noise criteria will be derived from the measured baseline levels at the representative locations around the site perimeter using the BS4142 method for assessing external noise at residential properties. These criteria will be used as design standards for all fixed plant on the airfield so as to ensure significant noise impacts are avoided. Ground noise levels in 2022 are likely to be unrepresentative due to the effects of the COVID-19 pandemic. The 2016 Ground Noise Baseline Report provides a comprehensive survey of baseline noise levels at 16 noise sensitive receptors around the periphery of the airport. It is anticipated that where other receptors need to be considered for the assessment of fixed noise sources suitable baseline noise levels can be derived from this report interpolating between locations if necessary.			
13.26	Ground Noise	The effects of ground noise (from engine ground running or aircraft auxiliary power units) on local communities, particularly in Horley, Charlwood, and Crawley, are unclear and further work is required.	JLAs	Section 14.9 (see p14.86) of the PEIR describes the expected impacts of ground noise including ground running and APU noise with details provided in Section 6 of Appendix 14.9.3.	The ground noise modelling results were discussed with the TWG on 29 November 2022. A detailed assessment of noise from engine ground running and APUs is provided in Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039 and ES Appendix 14.9.3: Ground Noise Modelling).	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039 and ES Appendix 14.9.3: Ground Noise Modelling).	
13.27	Ground Noise	A full description of methods / techniques is not presented in the PIER (e.g. noise survey forms), particularly with reference to the 2016 noise survey at the twelve sites shown in Figure 14.4.1	JLAs	The 2016 Baseline Survey report has now been issued to the Noise Topic Group as part of ongoing discussions with Local Authorities on details of the noise assessment and proposed mitigation.	N/A	Full details are provided in ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176)	
13.28	Ground Noise	The assumption that no change occurred between 2016 and 2018 in baseline data needs to be validated if it is to be relied upon. No justification has been provided for the assumption that baseline noise levels have not changed since 2016. This should be confirmed.	JLAs	Noted, however, ground noise is modelled for all assessment years and the levels and changes in noise are used in the assessment. Air traffic at Gatwick changed very little between 2016 and 2019: Average summer 16 hour day ATMs reduced by 0.6% from 771 to 766 and average summer night traffic was unchanged at 127 ATMs. Similarly, road traffic levels of local roads in general changed little in this period. Therefore, it is reasonable to assume that ambient noise levels in 2018 and 2019 were very similar to those measured in the 2016 baseline survey.	Para 14.4.21 of ES Chapter 14: Noise and Vibration (APP-039. ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176). The validity of this baseline survey in 2023 is discussed in paragraph 14.6.20 ES Chapter 14: Noise and Vibration (APP-039).	Para 14.4.21 of ES Chapter 14: Noise and Vibration (APP-039. ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176). Paragraph 14.6.20 ES Chapter 14: Noise and Vibration (APP-039).	

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13.29	Ground Noise	The Gatwick 'hum' in any particular location varies according to wind direction. It would therefore be appropriate to measure the background (L90) noise levels in upwind conditions to ensure a true background noise level. The ground noise propagation should then be calculated using a positive downwind scenario. Details on weather condition assumptions should be provided in the ES.	JLAs	Wind direction has been considered carefully in the PEIR as explained in Appendix 14.9.3. Easterly and westerly operations are modelled separately. Initially downwind propagation was considered in all modelling cases, but this provided baseline levels above the measured baseline that were too conservative. This is because some receptors cannot always be downwind of some noise sources because the runway mode changes direction. To model wind effects more accurately, a realistic average wind speed and direction was used for westerly operations, and a different realistic average wind speed and direction was used for easterly operations. Different wind speeds and directions were also modelled for day and night. The wind direction corrections in the ground noise model for aircraft taxi movements have been calculated based on meteorological data taken from an airside mast at Gatwick in 2018. Average wind speed and direction has been calculated for four separate conditions: Day and Night under Easterly and Westerly operations. A summary of the 2018 meteorological data analysis is presented within Section 4.2 of Appendix 14.9.3 which also describes the methodology for calculating wind speed and direction effects within the noise model used in the PEIR for modelling noise from aircraft on the ground.	The methodology for modelling ground noise with relevant wind speed and direction is reported in Section 4.8 of ES Appendix 14.9.3 Ground Noise Modelling (APP-173).	Section 4.8 of ES Appendix 14.9.3 Ground Noise Modelling (APP-173)	
13.30	Ground Noise	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 their effectiveness. Details on ground noise model inputs, including source and bund locations, should be provided in the ES.	JLAs	Noise from end around taxiways has been predicted and assessed in Section 14.9 of Chapter 14. A new bund has been designed and ground noise levels have been modelled with it in place, as reported in Section 14.8 and 14.9 and in Appendix 14.9.3. Details of basic noise modelling inputs are included within Appendix 14.9.3 and bund/barrier locations are described in Section 14.8. More detail will be provided in the ES once the design has progressed and locations and dimensions have been confirmed. The assessment of end around taxiways presented in the PEIR reflects the usage which is expected to be very low based on the forecast fleet mix on which the predictions are based. In order to	The design of the noise bund has been refined through further modelling as shared with the TWG. Details of the noise barriers and bunds included in the scheme are provided in Section 14.8 of ES Chapter 14: Noise and Vibration (APP-039) and shown in Figure 4.2.1g. ES Appendix 14.9.3 Ground Noise Modelling (APP-173)	Section 14.8 of ES Chapter 14: Noise and Vibration (APP-039) and Figure 4.2.1g. ES Appendix 14.9.3 Ground Noise Modelling (APP-173)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				ensure that the impact of end around taxiway use was not simply averaged and ignored, it has been considered as part of the assessment of maximum noise levels. The text relating to end around taxiways will be reviewed to ensure that it has been adequately explained so that a clear presentation of the assessment methodology is provided in the ES.			
13.31	Ground Noise	The increase of aircraft using Gatwick will result in an increase in maintenance and ground runs. The location for future ground runs needs to be agreed and the impact calculated when compared to the present location and frequency. Details on source locations for the baseline and 'with development' models should be provided.	JLAs	Noise levels from ground runs with the Project have been predicted and assessed, see Section 14.9 and Appendix 14.9.3. A map of the engine ground running locations is shown on the next slide. It should be noted that there is no difference between the locations for the baseline and with development cases. The four locations and the relative assumed usages are as follows: Alpha 2 = 5%; Juliet Tango/Sierra = 50%; Juliet 4 = 10%; Yankee = 35%;	The 4 engine ground run locations are shown in Figure 5.2.1a of ES Appendix 14.9.3 Ground Noise Modelling (APP-173).	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039). The 4 engine ground run locations are shown in Figure 5.2.1a of ES Appendix 14.9.3 Ground Noise Modelling (APP-173)	
13.32	Ground Noise	Ground noise receptors are defined at Paragraph 14.6.18 of the PEIR. Whilst it is noted that the receptors cover the majority of properties around the airport boundary, a review of receptors identified the following that may need inclusion: Westfield Place Farm, Lowfield Heath Road; Mayfield Farm Bungalow and Maple Manor Hotel, Charlwood Road; Rowley Farm Cottage and Little Rowley, London Road.	JLAS	Westfield Place farm will be included in the assessment reported in the ES. Ground noise levels here will be mitigated by the noise bund described in the PEIR with more details being provided in the ES. Mayfield Farm Bungalow and Maple Manor Hotel, Charlwood Road are in the vicinity of Myrtle Cottage (ref 10) and would have similar impacts so do not need specific reporting. Rowley Farm Cottage and Little Rowley are both within 75 m of London Road which is a dual carriageway that generates significant levels of road traffic noise. By comparison, the representative assessment location used in the PEIR (no. 11 Rowley Farmhouse) is at the top of the hill and receives relatively little road traffic noise from London Road making it more sensitive to any ground noise impacts. Additionally, in consultation with the Noise Topic Group in November 2021, it has been identified that the Tinsley Green area could be better represented in the ground noise assessment presented in the PEIR, and we will therefore be including an additional assessment location for Tinsley Green (site 15 - Hoots Cottage) in the ES.	Hoots Cottage has been added to the assessment provide in the ES as discussed with the TWG. Figure 14.4.1 shows the 13 ground noise assessment locations including Hoot Cottage that was added following discussions at the TWG.	Section 14.9 of ES Chapter 14 Noise and Vibration (APP-039). Figure 14.4.1 Environmental Statement - Noise and Vibration Figures - Part 1 (APP-063) shows the 13 ground noise assessment locations including Hoot Cottage that was added following discussions at the TWG.	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.33	Ground Noise	Paragraph 14.4.76 of the PEIR states that there is less likely to be a significant effect if less than 10 events above the specified criteria. Whilst it is acknowledged that this is a commonly accepted approach for Lmax noise, it does not allow a complete understanding of how noise will affect local communities as Lmax noise levels could potentially be any level above the criteria. It may be helpful to define an upper limit for Lmax noise that no events should exceed. Alternatively, more information would be required on the number of events exceeding the criteria and the level of the exceedance in the assessment.	JLAs	Noted, this is a commonly accepted approach. Lmax levels are reported as absolute noise levels, not just numbers of events above criteria, in Table 14.9.6.	Table 14.9.15 of ES Chapter 14 provides for predicted maximum levels of aircraft taxi noise, for the baseline and with Project cases, arising at worst-case Noise Sensitive Receptors in each assessment area.	Table 14.9.15 of ES Chapter 14 Noise and Vibration (APP-039).	
13.34	Road Traffic Noise	The Study Area for road traffic noise should be defined in the ES to ensure that all potentially affected receptors that may experience an increase in road traffic noise are identified.	JLAs	We are confident the necessary area has been assessed in the PEIR by following DMRB guidance, but the study area for road traffic noise will be better defined in the ES.	Paras 14.4.15 to 14.4.17 of ES Chapter 14: Noise and Vibration (APP-039) explain that the study area includes all receptors that may experience potential adverse impacts, ie the area where noise increases or decreases could occur above the threshold levels used to assess effects, and for road traffic noise the entire strategic road network model (over 8,000 links) has been assessed.	Paras 14.4.15 to 14.4.17 of ES Chapter 14: Noise and Vibration (APP-039)	
13.35	Road Traffic Noise	Road traffic mitigation - would be helpful to illustrate the location of the proposed mitigation in the ES.	JLAs	Noted, at the PEIR stage the design was still evolving, but mitigation will be mapped in the ES.	Mitigation for road traffic noise was refined and is described in Table 14.8.4 of ES Chapter 14: Noise and Vibration. The location of potential barriers considered is shown by Figure 5.1.1: Noise Model (Scenario 1), in ES Appendix 14.9.4 Road Traffic Noise Modelling. An explanation for the reasons for the noise barriers chosen is provided at para 5.1.9 of this Appendix.	Table 14.8.4 of ES Chapter 14: Noise and Vibration (APP-039). Figure 5.1.1: Noise Model (Scenario 1), and para 5.1.9 in ES Appendix 14.9.4 Road Traffic Noise Modelling (APP-174).	
13.36	Road Traffic Noise	No justification is provided on the assumption that night-time road traffic noise effects will not be significant; Clarification should be provided in the ES if long-term changes in noise are calculated to be less than 5 dB; Details should be provided in the ES on the absolute level of road traffic noise at receptors experiencing short-term changes in noise of 1dB or more; An assessment of road traffic noise effects in interim years should be provided in the ES;	JLs	It is considered to be unlikely at this stage that night-time noise will give rise to significant effects because noise changes during the day are usually larger than during the night, however, night time noise modelling will be undertaken and this will be confirmed in the ES. Table 14.4.9 shows long term noise levels will mostly reduce with mitigation and will increase by less than 5dB. This will be updated in the ES for the final road scheme. Table 14.4.8 provides absolute levels of road traffic noise and shows no short term increases of more	Noise has been assessed in accordance with DMRB methodology within the ES for the final road scheme in the 2032 and 2047 assessment years including reporting noise levels at night for sensitive receptors and providing Figures with road noise contours and noise difference contours. See paras 14.9.242 – 257, and paras 14.9.265 – 277 of ES Chapter 14: Noise and Vibration (APP-039). Para 14.9.262 provides a qualitative assessment for the year 2038.	Paras 14.9.242 – 257, 14.9.262 and paras 14.9.265 – 277 of ES Chapter 14: Noise and Vibration (APP-039).	

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				than 1dB with mitigation. This will be updated in the ES for the final road scheme. A commentary on likely noise levels in interim years will be provided.			
13.37	Road Traffic Noise	Paragraph 2.1.4 states that all roads were modelled with a width of 7m; however, assuming all roads are 7 m wide may lead to some errors close to the road. Table 4.5.4 shows unmitigated and mitigated with scheme levels but does not label this clearly. It would be helpful to predict road traffic noise levels at the monitoring locations for direct comparison to measured noise levels. It would be helpful to define that mitigation is embedded into the project and unmitigated noise levels are provided for information only to demonstrate the effectiveness of mitigation.	JLAs	The CRTN modelling method was used that located sources 3.5m from the nearside carriageway. Also there are no receptors close to the roads. In Table 4.5.4 footnote 1 is used to identify mitigation, but this will be made more clear in the ES. It is not intended to model noise levels at the monitoring sites because monitoring sites are not always directly at sensitive receivers and traffic flows during monitoring may vary as discussed. Table 14.8.3 and text below it lists the mitigation to be added to the scheme, and noise levels are predicted with and without this mitigation to illustrate its effectiveness.	The methodology for Road Traffic Noise modelling using the CTRN method is fully described in Appendix 14.9.4 Road Traffic Noise Modelling (APP-174). Table 5.1.1 Predicted Road Traffic Noise Levels Daytime in the Short Term clearly shows mitigated and unmitigated noise levels, and also the effectiveness of the interventions which are now embedded into the project. Tables 6.3.1 and 6.3.2 give the predicted noise levels with the project's embedded mitigation for daytime and night-time. Tables 14.9.17, 14.9.18, 14.9.19 and 14.9.20 of ES Chapter 14 summarise the changes in road traffic noise at key receptors during the daytime and night time as a result of the Project.	Appendix 14.9.4 Road Traffic Noise Modelling (APP-174). Section 14.8 and Tables 14.9.17, 14.9.18, 14.9.19 and 14.9.20 and 14.9.2 of ES Chapter 14: Noise and Vibration (APP-039)	
13.38	Road Traffic Noise	The predicted noise levels from Table 4.5.4: Predicted Road Traffic Noise Levels appear acceptable but insufficient evidence has been provided with regards to the impacts on first floor receptors. Currently the only elevated receptors that appear to be considered are in Table 4.5.2 of Road Traffic Noise Appendix. All elevated facades must be considered in order to establish if the proposed barrier height provides acceptable mitigation to first floor and above.	JLAs	Noted, this is the intention. Further site visits have been completed and more will be undertaken to confirm affected buildings details. If LPAs are aware of any particular noise sensitive receptors, please let us know.	Building height have now been fully considered and modelled. Para 3.3.18 of ES Appendix 14.9.4 Road Traffic Noise Modelling (APP-174) sets out that noise sensitive receptor locations in the operational noise model were placed on each noise-sensitive building and at heights representing every floor at residential and non-residential locations above the ground, and at 1.5 metres (human height) within the Riverside Garden Park amenity area.	Para 3.3.18 of ES Appendix 14.9.4 Road Traffic Noise Modelling (APP-174).	
13.39	Construction Noise	Justification should be provided in the ES for identifying a Negligible effect if a receptor is exposed to construction noise for a duration of less than one month.	JLAs	Noted, impacts of < 1 month should generally be rated as 'minor'. Major construction projects, such as HS2, adopt this approach to short term impacts. This will be clarified in the ES	Noted, impacts of < 1 month should generally be rated as 'minor' and not significant. Paras 14.4.33-45 of ES Chapter 14 Noise and Vibration (APP-039) set out that Construction Noise has been assessed in accordance with BS5228-1:2009+A1:2014. Para 14.4.39 explains that when predicted noise levels are above LOAEL thresholds, but below the SOAEL, other factors have been taken into account in determining whether the effect could be significant, such as the number of people affected, and the duration of the activity causing the noise impact. Para 14.4.41 defines negligible effects as those below the LOAEL.	Paras 14.4.33-45 of ES Chapter 14 Noise and Vibration (APP-039)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.40	Construction Noise	Details should be provided in the ES on construction activities taking place during each construction assessment period; Details on assumptions on plant for each construction activities should be provided in the ES; Details on predicted construction noise levels during each assessment period should be provided in the ES; Embedded mitigation will be secured in the CoCP; however, there is discussion regarding “additional mitigation”, which is not defined in the PEIR. As the “additional mitigation” is that secured by the CoCP, it should be part of the main assessment and not identified as additional. Detail on mitigation assumptions should be provided should be provided in the ES.	JLAs	Appendix 14.9.1 lists the activities expected to take place in day, evening and night periods. Plant teams will be provided in the ES. Predicted construction noise levels will be provided in the ES. Further mitigation, e.g. noise barriers will be assessed in the ES, but the Section 61 process will secure the final choice of mitigation once the contractor is on board.	Appendix 14.9.1: Construction Noise and Vibration describes the Construction Noise Model identifying assumptions on the plant used, for which construction activities and in which period (day, night or both). Tables 14.9.1 and 14.9.2 provide predicted levels of construction noise for 24 periods during construction at community receptors in each of 12 receptors Areas, for daytime and night-time. Paras 14.9.5 and 14.9.46 of ES Chapter 14: Noise Vibration (APP-039) explain that construction will be carried out in accordance with ES Appendix 5.3.2 Code of Construction Practice (APP-082). Table 14.9.3 of Chapter 14, identifies relevant “Best Practical Means” measures which will be adopted. Where noise barriers have been identified as practicable they have been included within the assessment as discussed in paras 14.9.50 – 14.9.52.	Appendix 14.9.1: Construction Noise and Vibration (APPP-171). Tables 14.9.1, 14.9.2, 14.9.3 and paras 14.9.5 and 14.9.46 and 14.9.50 to 14.9.52 of ES Chapter 14: Noise Vibration (APP-039). ES Appendix 5.3.2 Code of Construction Practice (APP-082).	
13.41	Construction Noise	Clarification should be provided in the ES as to why Moderate Adverse effects were identified for construction noise; It is not identified whether preliminary predictions identify if any properties may qualify for temporary rehousing. This information should be provided in the ES; Details should be provided in the ES if receptors that are predicted to experience noise levels exceeding the LOAEL but below the SOAEL experience a significant effect;	JLAs	Paragraph 14.9.2 and 14.9.3 note that the PEIR assessment is based on information that will be refined for the ES, so the rating of noise impacts will also be refined in particular with the addition of further mitigation. The assessment of effect will follow the methodology stated in the Section 14.4 of the PEIR and the rating will be explained in the ES. Noted, the ES will estimate numbers of properties likely to require noise insulation or temporary rehousing.	Paras 14.9.52 -14.9.58 of ES Chapter 14: Noise and Vibration (APP-039) explain the criteria by which householders would qualify for temporary re-housing, however, the works are to be phased so that it is expected that the need will not arise. Chapter 14, Table 14.9.4 and paragraphs 14.9.60 to 14.9.63 describes where properties may experience significant effects after mitigation within the assessment significance criteria, including those which remain below the SOAEL.	Paras 14.9.52 -14.9.58 of ES Chapter 14: Noise and Vibration (APP-039) Chapter 14, Table 14.9.4 and paragraphs 14.9.60 to 14.9.63	
13.42	Construction Noise	MVDC does not accept that it is reasonable to downgrade the severity of construction noise impacts based on the size of the population affected. Evidence to support this approach is requested and clarification should be provided in the Environmental Statement as to why Moderate Adverse effects have been identified for construction noise.	JLAs	Paragraph 14.4.37 notes that other factors are taken into account where predicted levels are above LOAEL but below SOAEL. Consideration of the size of the populations was included for example in the HS2 assessments. Paragraph 14.4.35 states the SOAEL. Levels above SOAEL are significant regardless of population. The PEIR expected that with mitigation including noise insulation where necessary impacts will be below SOAEL and reduced to Moderate. Further mitigation will be considered in the ES.	Paras 14.4.33-45 of ES Chapter 14 Noise and Vibration (APP-039) set out that construction noise has been assessed in accordance with BS5228-1:2009+A1:2014. Para 14.4.39 explains that when predicted noise levels are above LOAEL thresholds, but below the SOAEL, other factors have been taken into account in determining whether the effect could be significant, such as the number of people affected, and the duration of the activity causing the noise impact. Levels above SOAEL are significant regardless of population.	Paras 14.4.33-45 of ES Chapter 14 Noise and Vibration (APP-039).	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.43	Construction Noise	The CoCP in the ES will contain details of the following: Details of relevant legislation and standards that were used to inform the CoCP; Construction vibration thresholds for human disturbance; Construction vibration thresholds for cosmetic building damage; Construction noise thresholds – including thresholds for insulation and temporary rehousing; Details on the Section 61 consent process and requirement of a Section 61 application; Details of consultation with the host authorities regarding the Section 61 process;	JLAs	Agreed, this is the intention. A Construction Phase Noise Insulation and Temporary Rehousing Policy will be produced explain the details of the schemes.	<p>Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082) provides the information requested as follows:</p> <ul style="list-style-type: none"> relevant legislation and standards that were used to inform the CoCP (paras 5.9.3 to para 5.9.8); Construction vibration thresholds for human disturbance (see para 5.9.8 with reference to BS5228 Part 2, 2009, also Chapter 14 para 14.4.43); Paragraph 14.4.45 identifies from BS5228 Part 2 guidance a level of 10 mm/s PPV as likely to be intolerable for any more than a very brief exposure. Levels of between 15 and 50 mm/s are given in BS 5228 Part 2 as guide values for cosmetic damage to various types of buildings. Vibration levels predicted in Section 4 of Appendix 14.9.1 Constriction Noise Modelling are below 1 mm/s indicating no significant effects are predicted on building occupants, as well as building structures. Construction noise thresholds – including thresholds for insulation and temporary rehousing (see paras 5.9.9 to 5.9.13); Details on the Section 61 consent process and requirement of a Section 61 application; Details of consultation with the host authorities regarding the Section 61 process (see para 5.9.5) <p>Para 14.9.1 onwards of ES Chapter 14: Noise and Vibration (APP-039)</p>	<p>Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)</p> <p>Para 14.9.1 onwards of ES Chapter 14: Noise and Vibration (App-039)</p>	
13.44	Construction Noise	A draft code of construction practice is offered but, given the significant impacts identified, further clarification is required on the following issues: Details of consultation with the host authorities regarding the	JLAs	It is the intention to add this detail to the ES report and CoCP. Noting that the exact methods of working will be decided later by the contractor, there will remain some uncertainty in the predicted noise levels and hence maps of zoning plans may	Details of the construction noise assessment, mitigation proposals and results reported in 12 assessment zones were discussed with the TWG on 4th January 2023.	Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		Section 61 process; Predicted noise impacts to be generated by the proposed construction activities; Individual zoning plans identifying the areas where there is likely to be an exceedance of the SOAEL and the number of sensitive properties likely to be affected; A scheme of assessment to provide systematic base line noise surveys of all high risk zones in accordance with these zoning plans; Construction noise thresholds to be mitigated or avoided, including thresholds for insulation and temporary rehousing.		not be appropriate but will be considered. We will share the refined assessment results and full CoCP proposals with the Noise Topic Group for discussion as we work towards the ES and DCO submission.	<p>Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082) includes information on:</p> <ul style="list-style-type: none"> • Details of consultation with the host authorities regarding the Section 61 process; (para 5.9.1); • Predicted noise impacts to be generated by the proposed construction activities; (See Appendix 14.9.1: Construction Noise and Vibration and ES Chapter 14 Tables 14.9.1 to 14.9.4); • Individual zoning plans identifying the areas where there is likely to be an exceedance of the SOAEL and the number of sensitive properties likely to be affected; NSRs are identified in Chapter 14. Figure 14.4.2 that shows the 12 zones used. Significant effects and quantification of specific mitigation are identified in Table 14.9.4.; • A scheme of assessment to provide systematic base line noise surveys of all high risk zones in accordance with these zoning plans; (see Appendix 5.3.2: Code of Construction Practice para 5.9.15-5.9.17) • Construction noise thresholds to be mitigated or avoided, including thresholds for insulation and temporary rehousing (see para 5.9.11). 	Appendix 14.9.1: Construction Noise and Vibration and ES Chapter 14 Tables 14.9.1 to 14.9.4) Figure 14.4.2 Environmental Statement - Noise and Vibration Figures - Part 1 (APP-063)	
13.45	Construction Noise	MVDC would expect the following management measures to be developed with any future submission: Commitment to appoint a suitably qualified acoustics practitioner to implement and manage a noise and vibration monitoring programme; Where necessary, suitable provision of continuous noise monitoring for all construction zones identified as presenting	JLAs	Some of these points were discussed and replied to in the Noise Topic Group meeting on 2nd November 2021. The CoCP will clarify the approach to noise monitoring during construction, including continuous monitoring which may be needed in any areas of high long duration impact. The CoCP will clarify the approach to noise monitoring during construction and a commitment to publish measured levels on line in cases where	See Appendix 5.3.2 Code of Construction Practice (APP-082) paras 5.9.17 – 5.9.21 regarding provisions for monitoring and the need for a suitably qualified acoustics practitioner, paras 4.12.6 – 4.12.7 for complaints management, and para 5.8.2 for recording of complaints.	Section 5.9 and Section 4.12 of Appendix 5.3.2 Code of Construction Practice (APP-082).	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		potential for highly intrusive noise impacts; Details of how construction zones will be screened to identify high risk construction activities where continuous PM10 monitoring will be needed (see the Mayor of London guidance 2014); Provision of an online reporting portal showing continuous monitoring results and any exceedances; A contractor first approach showing how complaints will be reported, logged and managed, and how records of corrective action will be kept.		widespread impacts are expected. The CoCP will clarify the procedures for handling noise complaints. Noted, para 5.10.3 of the Outline CoCP gives this commitment, and detail will be added.			
13.46	Construction Noise	Comment at 8.11.51 which refers to re-housing residents while noise mitigation is undertaken, yet no reference to where this temporary accommodation will be. In an area with a restriction on available homes, further detail and plans for this should be shared.	JLAs	This paragraph refers to temporary re-housing as a last resort if all other mitigation is not sufficient, so as to avoid residents being significantly affected by levels of construction noise inside their dwellings. The Code of Construction Practice in the ES will provide further details.	Para 5.9.13 of ES Appendix 5.3.2 Code of Construction Practice (APP-082) sets out that as standard practice if any temporary housing is required will be provided before works start. The ES Chapter 14 Para 14.9.60 to 14.9.63 does not identify the need for any temporary rehousing.	Para 5.9.13 of ES Appendix 5.3.2 Code of Construction Practice (APP-082) Para 14.9.60 to 14.9.63 of ES Chapter 14: Noise and Vibration (APP-039).	
13.47	Construction Noise & Vibration Update	Noise Sensitive Receptors discussed by areas in PEIR	JLAs	Further NSR details identified through site visits, residential receptors discussed in smaller areas. LPAs to advise of any particularly sensitive receptors?	The 4 receptors areas used in the PEIR has been increased to 12 noise sensitive receptor areas depicted in ES Chapter 14 (APP-039) Figure 14.4.2 Noise Sensitive Receptor Areas. The Construction Noise Assessment identifies specific locations and assesses the significance of effects (see for example Table 14.9.4 Potential Construction Noise Impacts with Additional Mitigation).	ES Chapter 14 (APP-039) Figure 14.4.2 Noise Sensitive Receptor Areas. Section 9 of Chapter 14: Noise and Vibration (APP-039)	
13.48	Construction Noise & Vibration Update	Construction noise modelled for 73 main construction works in PEIR	JLAs	Construction plant teams refined, refined road scheme modelling adjusted and program of concurrent works updated. On site noise barrier mitigation modelled.	The construction noise assessment provided in the ES builds in more detail than the PEIR as requested by local authority stakeholders. 170 areas of construction work across the airfield and highways areas have been modelled, each with construction activities occurring at the relevant times within the construction programme. The assessment provides specific mitigation measures to reduce noise impacts from night works as discussed in Section 14.8 and 14.9 of ES Chapter 14: Noise and Vibration and Environmental Statement - Appendix 14.9.1 Construction Noise Modelling.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039) Table 14.9.4 Potential Construction Noise Impacts with Additional Mitigation and Appendix 14.9.1: Construction Noise and Vibration (APP – 171)	
13.49	Construction Noise & Vibration Update	Construction traffic routes assessed qualitatively in PEIR	JLAs	Construction traffic modelled (see above).	Construction traffic has been modelled for the three busiest phases of construction and construction traffic management.	Paras 14.9.66 – 14.6.99 of ES Chapter 14: Noise and Vibration (APP-039) and ES Appendix 14.9.4:	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Road Traffic Noise Modelling (APP-174).	
13.50	Construction Noise & Vibration Update	Vibration – sources identified, impacts not expected as per PEIR	JLAs	Vibration levels predicted.	Vibration levels have been predicted and assessed as part of the DCO application.	See paras 14.9.64 – 65 of ES Chapter 14: Noise and Vibration (APP-039). Details and levels provided in Section 4 of Environmental Statement - Appendix 14.9.1 Construction Noise Modelling (APP-171)	
13.51	Construction Noise & Vibration Update	Code Of Construction Practice in PEIR	JLAs	Outline CoCP developed into full CoCP	The noise and vibration and other sections of the CoCP have been refined as part of the DCO application.	ES Appendix 5.3.2 Code of Construction Practice (APP-082).	
13.52	Construction Noise & Vibration Update	Commitment to Noise insulation to address residual significant effects in PEIR	JLAs	Noise Insulation and Temporary Rehousing Policy will be produced.	The CoCP makes this commitment. See response to issue references 13.44 and 13.46 above.	Paras 14.9.52 -14.9.58 of ES Chapter 14: Noise and Vibration (APP-039) and Section 5.9 of Environmental Statement - Appendix 5.3.2 Code of Construction Practice (APP-082)	
13.53	Air Noise	Modelling 2019 ATMs with 2032 fleet technology.	JLAs	As explained by GAL within the TWGs and Noise Envelope meetings, this would be an unrealistic situation as Gatwick Airport is expected to continue to grow within the capacity of its single runway. This assumption was made in the 2019 Masterplan document and in the Future Baseline presented in the PEIR. The DCO Application has therefore not undertaken this modelling as it would present an unrealistic situation.	GAL do not believe this to be a realistic assumption for use within the DCO application, as discussed in TWG meetings. This has been communicated to RBBC and is set out in an email from Mitchell Environmental Ltd to Reigate and Bansted Council of 30 June 2022 on page 327 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [APP-179].	Page 327 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (Doc Ref. 5.3) [APP-179].	
13.54	Air Noise	Forecast single mode for future years.	JLAs	This issue has been discussed in the TWGs. GAL responded to a technical note issued on behalf of Local Authorities on 6th January 2023 in relation to noise metrics. The response was circulated to Local Authorities on 3rd February 2023 as part of papers for Noise TWG 4 of 8th February 2023. The issue is addressed directly on page 374 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope. Leq 16 hr and Leq 8 hour are defined as average modal split by DfT when defining LOAEL. This is	This issue has been discussed in the TWGs. GAL responded to a technical note issued on behalf of Local Authorities on 6th January 2023 in relation to noise metrics. The response was circulated to Local Authorities on 3rd February 2023 as part of papers for Noise TWG 4 of 8th February 2023. The issue is addressed directly on page 374 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (APP-179). Single mode contours are not included in the ES for the reasons discussed with the TWG as	Page 374 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (APP-179) Para 14.9.150 to 14.9.158 of ES Chapter 14: Noise and Vibration (APP-039). Tables 4.2.1 to 4.2.14 of ES Appendix 14.9.2: Air Noise Modelling (APP-172).	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				<p>because long term noise effects such as annoyance and sleep disturbance are not determined by either noise levels on westerly operating days or by noise levels on easterly operating days, but by the combination of both as experienced in the relevant proportions over the long term. CAP 1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition, July 2021 concludes: that “Practically, this means that single-mode contours are unsuitable for decision making, but that they may be helpful for portraying exposure and changes to exposure. Of the average-day modes, the existing 92-day summer average mode was found to correlate better than shorter average modes. There was therefore no evidence found to support a change from the current practice of basing LAeq,16h on an average summer day.”</p> <p>Single mode noise contours would not provide an appropriate representation of noise effects. However, GAL has issued information on noise levels on easterly and westerly days, because this may be helpful in illustrating changes in exposure. For this GAL chose 7 Community Representative Locations (See ES Figure 14.9.1) as described in para 14.9.150 and 14.9.151 of the ES Chapter 14: Noise and Vibration. Paras 14.9.152 to 14.9.158 of ES Chapter 14 describe the noise changes that the NRP will produce, including on easterly days and westerly days, using the data in terms of Leq, 16 hr, Leq 8 hr, N65, and N60 for average mode, westerly mode and easterly mode provided for 2032 with the Project, the 2032 base and 2019 base, for the central case and slower transition fleet in 14 tables 4.2.1 to 4.2.14 of ES Appendix 14.9.2: Air Noise Modelling.</p>	<p>noted in the column to the left. Para 14.9.150 and 14.9.151 of the ES Chapter 14: Noise and Vibration describe 7 Community Representative Locations chosen for describing noise changes. Paras 14.9.152 to 14.9.158 of ES Chapter 14 describe the noise changes that the NRP will produce at these 7 locations, including on easterly days and westerly days, using the data in terms of Leq, 16 hr, Leq 8 hr, N65, and N60 for average mode, westerly mode and easterly mode, provided for 2032 with the Project, the 2032 base and 2019 base, for the central case and slower transition fleet in 14 tables 4.2.1 to 4.2.14 of ES Appendix 14.9.2: Air Noise Modelling.</p>		
13.55	Air Noise	Annual and summer contours should be provided to monitor growth outside the summer period (as requested by PINS)	JLAs	A response is provided in Table 14.3.1 of ES Chapter 14: Noise and Vibration in that Diagram 4.5.1 of the Scoping Report related to growth in air traffic without the Project and indicated clearly that the highest numbers of flights would continue to occur in the months of June to September (20%	Notwithstanding the explanation provided, annual Lden and Lnight contours are provided for baseline and with Project conditions in Section 14.6 and 14.9 of ES Chapter 14 to illustrate noise changes over the whole year including the winter months.	Section 14.6 and 14.9 of ES Chapter 14 Noise and Vibration (APP-039) Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
				above winter months) as captured by the Leq noise modelling period from 16 June to 15 September. This is confirmed by current forecasts.	Section 4 of Appendix 14.9.2 provides tables of annual Lden and Lnight. Figures 14.9.28 and 14.9.39 show annual Lden and Lnight contours. Para 14.9.136 to 14.9.139 discuss the changes in annual Lden and Lnight contours compared to the changes in summer season Leq 16 hr and Leq 8 hour night contours.	ES Appendix 6.2.1: Scoping Report (APP-092 and APP-093) ES Chapter 4: Existing Site and Operation (APP-029)	
13.56	Modelling and scenario testing	That GAL provide clarification over the modelling and undertake further scenario testing as described above in addition to any other scenarios arising from discussion with the local authorities.	CBC & MSDC	N/A	The noise modelling method is summarised in Section 2 of Appendix 14.9.2 and was explained in a CAA ERCD presentation and slide deck hand out to the TWG on 7th June 2022. GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios modelled and reported in the ES. These comprise: <ul style="list-style-type: none"> 8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, Lmax and overflights; 5 assessment years – 2019, 2029, 2032, 2038 and 2047 2 Fleet transition scenarios, the Central Case and Slower Transition Case. These are presented in 71 figures in the ES relating to air noise impacts with the data tabulated in Appendix 14.9.2. LPAs have been given access to an air noise web viewer to download air noise contours. This is considered a suitable set of noise modelling scenarios to allow the ES as written to describe the likely significant effects of the Project.	ES Noise and Vibration Figures (APP-063-065) ES Appendix 14.9.2: Air Noise Modelling (APP-172)	
13.57	Nosie envelope	GAL is required to adopt the proper process as set out in CAP 1169 to set an appropriate scheme for a noise envelope. In this GAL is to include the Joint Districts and Boroughs as well as the West Sussex County Council and the Surrey County Council.	CBC & MSDC	N/A	GAL are confident that the consultation carried out via the TWGs and the Noise Envelope Group in summer 2022 is fully consistent with the guidance given in CAP1129 on the process by which a noise envelope should be developed. During this process the TWGs were consulted on the make up of the Independent Reviewer (then termed the Review Body) who would review and approve the outputs from the noise envelope when it becomes active. GAL's proposal for a sub-committee of GATCOM was opposed by the LPAs. GAL subsequently	ES Appendix 14.9.5: Air Noise Envelope Background (APP-175) ES Appendix 14.9.7: The Noise Envelope (APP-177) ES Appendix 14.9.8: The Noise Envelope Group Output Report (APP-178) ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (APP-179)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					decided upon the CAA as the Independent Reviewer as explained in ES Appendix 14.9.7: The Noise Envelope.		
13.58	Environmental Assessment	It is recommended that the environmental assessment is updated to take account of likely or actual changes to airspace or options that are proposed by FASI.	CBC & MSDC	N/A	At the time of the DCO submission FASI-S has not developed likely airspace change options that can be assessed.	Para 14.5.7 of ES Chapter 14: Noise and Vibration (APP-039)	
13.59	Noise Action Plan	Where, due to timings, the Noise Action Plan cannot be replaced immediately, the new plan will need to run concurrently with the extant plan.	CBC & MSDC	N/A	Explanation of how any future review of the noise envelope contour limits interact with the separate requirement to produce a Noise Action Plan every five years is discussed in paragraph 8.4.2 of ES Appendix 14.9.7: The Noise Envelope.	Para 8.4.2 of ES Appendix 14.9.7: The Noise Envelope (APP-177).	
13.60	Gatwick Goods Yard	Concern regarding the potential use of Gatwick Goods Yard for aggregates and the potential for noise disturbance to residents, particularly at night.	CBC & MSDC	N/A	Construction of the NRP does not require use of the Crawley Good Yard and therefore its use is not assumed in the Project's construction plans and the DCO does not seek powers to use it. In any event, we note the Crawley Local Plan safeguards continued use of the Crawley Good Yard in the Tinsley Lane development brief, by requiring any housing that is developed on this site to the south of the yard to include noise mitigation so as to allow the yard to continue to operate 24 hours a day	Table 14.3.1 of ES Chapter 14: Noise and Vibration (APP-039), p14-25 notes Crawley Goods Yard is no longer part of the Project.	
12.61	Air Traffic	The increase in capacity at Gatwick will mean routes not previously used frequently would experience significantly more air traffic than at present. The council is aware that significantly greater use of WIZADF, for example, will be required to achieve the suggested hourly movement rates both with and without increased use of the Northern Runway and this would need to be aligned with FASI-S and potentially require to be assessed against the CAP1616 criteria for airspace change, as required by PINS in the Scoping Opinion.	CBC & MSDC	N/A	As discussed in the TWGs the existing WIZAD SID is to be used more in the future baseline, but not so as to require an airspace change.	Para 14.6.39 of ES Chapter 14: Noise and Vibration (APP-039).	
13.62	Modelling 2019 ATMs	Modelling 2019 ATMs with 2032 fleet technology.	CBC & MSDC	N/A	Repeat. See response included in row 13.53		
13.63	Forecast single mode	Forecast single mode for future years.	CBC & MSDC	N/A	Repeat. See response included in row 13.54		

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.64	Summer contours	Annual and summer contours should be provided to monitor growth outside the summer period (as requested by PINS)	CBC & MSDC	N/A	Repeat. See response included in row 13.55		
13.65	Noise envelope	It is also unclear how the noise envelope relates and works with other regimes e.g. DfT night flight noise regime, landing fees and charges and the Noise Action Plan required under the Env Noise (England) Regulations 2006.	CBC & MSDC	N/A	This issue has subsequently been discussed in the Noise Envelope Group meeting. The Noise Envelope would be enforced via the DCO and would be quite separate from the DfT night flight noise regime, landing fees and charges, although these would be ongoing measures that may help achieved compliance with the noise envelope limits. See also response included in row 13.59 for clarification on how the noise envelope interacts with the separate Noise Action Plan requirement.	Section 2.1 of ES Appendix 14.9.5: Air Noise Envelope Background Section 2 of ES Appendix 14.9.7: The Noise Envelope	
13.66	Scenario testing	Need for further scenario testing including 100% Easterly and Westerly modal split for specific years comparison of the difference between what the noise would be now with current aircraft fleet, ie modelling future fleet mix at current movement levels, the cumulative impact of additional night time awakenings for the location.	CBC & MSDC	N/A	The modelling of 100% modal split is set out in response included to row 13.4 above. The modelling of current movement numbers with future fleet is responded to in response to row 13.53 above. Additional Awakenings have been assessed in the ES.	Section 7 of ES Appendix 14.9.2: Air Noise Modelling (Doc Ref 5.3) [APP-172]	
13.67	Compensation	Compensation for residual impacts remain to be negotiated.	CBC & MSDC	N/A	The proposed Noise Insulation Scheme was discussed in the TWG on 4th January 2023.	ES Appendix 14.9.10: Noise Insulation Scheme (Doc Ref 5.3) [APP-180]	
13.68	Construction impacts	Noise impacts of construction, including material supplies not well understood.	CBC & MSDC	N/A	Chapter 14 of the ES provides a detailed assessment of construction noise, with full results in Appendix 4.9.1 quantifying how many receptors will be affected in each of 12 areas. Construction noise has been modelled based on a series of worst-case assumptions as reported in Section 14.5, within 24 periods across the 15 year construction programme from 2024 to 2038. 170 areas of construction work across the airfield and highways areas have been modelled,	ES Chapter 14: Noise and Vibration (APP-039). ES Appendix 14.9.1: Construction Noise (Doc Ref 5.3) [APP-171]	
13.69	Operation restrictions	To prevent and minimise ground noise and air noise impacts on residents any Northern Runway usage should be limited to operations between 07:00 to 23:00 and is only used during the day for Chapter 3 aircraft or quieter - [NB The effect of this	CBC & MSDC	N/A	Responded to at row 13.2 above		

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		proposal on other routes based on future operations needs to be determined]					
13.70	WIZARD	Requirement to understand fully the implications of the potential greater use of WIZAD including establishing background levels now as LAeq as well as Lmax events in those locations to demonstrate.	CBC & MSDC	N/A	Responded to at row 13.3 above		
13.71	Noise envelope	Means of governance and scheme of regulation for the noise envelope, control of ground noise, construction noise etc. and expectations over enforcement incl. funds required for local authority oversight and enforcement.	CBC & MSDC	N/A	Noise Envelope governance was discussed at length in the Noise Envelope Group. Ground noise will continue to be managed as at present. Construction noise management is reported in the CoCP.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) Environmental Statement - Appendix 5.3.2 Code of Construction Practice (APP-082)	
13.72	Air Noise	Noise impact should be considered at day as well as at night, although increase sensitivity at night time is acknowledged	HDC	N/A	We have assessed all types of noise in the day and night periods with suitable different criteria for each.	Section 4 of ES Chapter 14: Noise and Vibration (APP-039).	
13.73	Mitigation / Compensation	Mitigation and compensation for properties affected by noise resulting from the NRP is necessary. This should be considered separately to the noise envelope.	HDC	N/A	The Noise Insulation Scheme is separate from the Noise Envelope.	Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	
13.74	Noise Envelope	Report issued to local authorities before submission was, in GAL's own words, to support the creation of a noise envelope, not a final report for local authorities to comment on. Question whether the correct process has been followed. Discussion with local authorities has been limited to TWGs, with issues raised in the PEIR still outstanding.	HDC	N/A	The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. Environmental Health Practitioners from Crawley, Reigate and Bansted, Mole Valley, Mid Sussex and Horsham were invited and variously attended six of the Noise Envelope Group Local Sub-Group and joint group meetings over summer 2022 as well as the TWG meetings to discuss the noise envelope proposals.	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175) Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)	
13.75	Noise Envelope	Unclear what criteria GAL will use to determine the suitability of the noise envelope and how this conforms to the NPPF, ANPS and Noise Policy Statement for England (NPSE).	HDC	N/A	The noise envelope proposed in the DCO is consistent with government policy including the NPPF, ANPS and NPSE and follows the guidance provided by the CAA in CAP1129. Criteria metrics and levels were discussed in detailed with Noise Envelope Group.	As 13.74	
13.76	Noise Envelope	Government expectation is that noise envelope benefits should be shared between the aviation industry and local communities. The benefit of quieter aircraft to local communities will not be realised if it is interpreted as an opportunity to increase the number of flights.	HDC	N/A	The need in policy to share these benefits was discussed in the Noise Envelope Group, in particular in the meeting on 23 June 2022 when GAL presented an analysis of benefits sharing and discuss Community Noise Group analysis using a different method. The analysis showed the benefits would be partly shared, with communities receiving 50% for daytime and 66% for night-time, in 2038 with the slower transition fleet.	P 165 to 175 of Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179).	
13.77	Fleet Mix	PEIR references to fleet mix are out of date.	HDC	N/A	The ES fleet mix data is summarised in Section 3 of ES Appendix 14.9.5	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175)	
13.78	Noise Measurement Metrics	A number of metrics should be employed, to form a suite to identify items to be monitored and reported against. Primary metrics should be those with national/international standards against which airports are judged and which are, therefore, likely to impact operation. Secondary metrics should be those which inform noise control and are produced for information. Under an appropriate review mechanism it should be possible to escalate or relegate metrics between primary and secondary. HDC has provided further detail on specifically which datasets should be monitored, verified and reported and which should fall within the primary or secondary metric categories.	HDC	N/A	The choice of metrics for the noise envelope was discussed in the Noise Envelope Group in several meetings. Nine secondary metrics have been adopted in response to the proposal put forward by HDC and others. The idea of escalating secondary metrics to primary metrics was also discussed, but rejected due to the shortcomings of the secondary metrics, and correlations between them, which were also discussed, as well as the need to meet general planning guidance.	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175) Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.79	Noise Measurement Metrics	N-above contours N60 and N65 should be given equal importance, as well as average sound levels Leq 8 and 16 hr respectively.	HDC	N/A	Leq metrics collate better with daytime annoyance and night-time sleep disturbance, ie the effects to be managed, as explained in NEG meetings and Section 2 of ES Appendix 14.9.5 Air Noise Envelope Background.	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175)	
13.80	Noise Contours	Request that a review of predicted vs. actual noise contours should be undertaken, and published, annually.	HDC	N/A	Last year's 'actual' modelled noise contours and predicted contours for the next 5 years will be published every year under the Annual Monitoring and Forecasting Reports required in the Noise Envelope. Section 7.4 of the Noise Envelope requires further checks of noise monitoring data and noise model used, as specifically requested by HDC.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.81	Noise Envelope	The structure for monitoring of the noise envelope and approval of any reports needs to be agreed.	HDC	N/A	The noise envelope lays out details of these processes.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.82	Material Publication	Publication of material needs to confirmed and agreed.	HDC	N/A	The noise envelope in para 7.2.6 requires the Annual Monitoring and Forecasting Reports to be published in the GAL website.	Para 7.2.6 of Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.83	Noise Measurement Metrics / Fleet Mix	Metrics should not only be shown for increase in capacity following implementation of NRP but should also include the cumulative effect of existing and new runways against the 2019 baseline. This is to include sensitivity testing of the 2019 operations utilising 2029 fleet.	HDC	N/A	This was discussed in the TWGs. The Noise Envelope limits are set for future operations with the NRP to give certainty that, following an initial increase in noise after opening, noise levels will reduce. The 2029 fleet did not exist in 2019 so this not a realistic basis on which to consider a Noise Envelope limit.	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175) Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)	
13.84	Noise Envelope	Clarification required on what triggers an extraordinary review of the noise envelope. This was discussed broadly at TWG on 4/1/23 but answer was not given.	HDC	N/A	Following this discussion in the TWG the review processes were considered further and are reported in Section 6 and 8 of the Noise Envelope.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.85	Noise Envelope	Will structures for oversight of the noise envelope include local authority representatives and will any expenses be covered by GAL, included appointments for independent advice?	HDC	N/A	Following careful consideration, the CAA will carry out this function as Independent Reviewer as specified in the Noise Envelope.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.86	Dispute	Where there is dispute what will resolution process be, what will structures and mechanisms be? Maybe a case for GATCOM, local authority or another party to facilitate this.	HDC	N/A	Dispute resolution processes are laid out in Sections 7 and 8 of the Noise Envelope.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.87	Enforcement	What is process for enforcement against noise envelope breaches, notwithstanding the preventative nature first and foremost?	HDC	N/A	Enforcement and actions plans required in the event of breach are laid out in Sections 7 and 8 of the Noise Envelope.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.88	Noise Measurement Metrics	In addition to using average values for noise the impact of individual events on communities as this is how they are experienced need to be clearly informed.	HDC	N/A	Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements.	Para 2.4.4 of the Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175) Requirement 19(1) of Schedule 2 to the draft DCO (APP-006)	
13.89	Air Noise	Re: ANCON noise modelling, given that monitoring and not certification data is used, how is the reference curve used for validation derived? Is it affected by Noise Abatement Departure Procedures for aircraft? Is additional monitoring needed to confirm model performance for the proposed 51dB contour?	HDC	N/A	The reference curve drawn between historic measured noise levels is used by ERCD to fine tune the ANCOM model every year. Because it is based on measured data, it is affected by the operational procedures adopted each year. The ANCON model is considered sufficiently accurate for the Leq 51dB contours that the CAA have provided for the ES.	Environmental Statement - Appendix 14.9.1 Construction Noise Modelling (APP-171) Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)	
13.90	WIZAD route	More information required on WIZAD usage. Previously noise contours showed an increase in the N60 compared to the baseline. Will N60 contours be provided as part of the increase WIZAD route activity?	HDC	N/A	Diagram 2.1.1 of ES Appendix 14.9.2: Air Noise Modelling (APP-172) provides the distribution of flights cross departure routes. N60 contours are provided but note there are no plans to use WIZAD at night.	ES Appendix 14.9.2: Air Noise Modelling (APP-172)	
13.91	Air Noise	Air Noise Assessment Methodology uses a population metric to define significant impacts, based on criteria used in the Heathrow Airport PEIR. This is not considered a valid comparison, given the rural, less populated character of the District, and it minimises the absolute magnitude of impact.	HDC	N/A	Much of the area affected by noise from Heathrow is rural. As noted in the ES the ranges were drawn from Institute of Environmental Management and Assessment (IEMA) Guidance on Environmental Noise Assessment (IEMA, 2014).	ES Chapter 14: Noise and Vibration (APP-039).	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
13.92	Noise Measurement Metrics	Community groups have suggested a noise metric which measures the magnitude and frequency of impulsive noise should be included in the noise envelope, which the Council supports. We suggest N60 and N65 should be further considered.	HDC	N/A	The Community Groups suggestion for a Noise Envelope metric to measure the magnitude or intensity of the individual aircraft noise has been adopted in the noise envelope as the Airport Fleet Average Aircraft Noise Lmax level, a secondary metric, as have N60 and N65.	Section 5 of Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.93	Awakening information	The use of awakening information needs to be presented (baseline vs future total effects).	HDC	N/A	Section 7 of Appendix 14.9.2 provides this as presented to the TWG on 5/10/2022.	ES Appendix 14.9.2: Air Noise Modelling (APP-172)	
13.94	Traffic Noise	There is concern that development will increase in road traffic 'spillage' from the main highways to the side roads and country lanes for airport trips. Even though the total noise will not be comparable to the main roads, the increase can be large and proportionally more disturbing due to its close proximity to residents and that it is made up of multiple 'events' rather than a general "hum". An assessment should be made of traffic flows on local roads and how this traffic is associated with Gatwick and how it can be mitigated. Receptor points on the local road network should be agreed with local authorities to establish the impacts.	HDC	N/A	The traffic noise assessment method was presented to the TWG on 28 June 2022 with deck of 13 slides provided which noted that over 8,000 road links in the Strategic Traffic Model have been assessed for changes in road traffic noise. Para 14.9.275 of Chapter 14 of the ES reports no change greater than 3dB are predicted.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.4 Road Traffic Noise Modelling (APP-174)	
13.95	Airspace Change	There is a disconnect between the expansion proposed at both Gatwick and Heathrow Airports and the potential implications of airspace change that will take place as a result of FASI South. GAL has concluded that cumulative noise assessment cannot take place for the health and wellbeing impacts, however, the Council considers that this approach is insufficient. GAL have stated that if new routings become available before the DCO submissions that these will be considered, however this should be assessed during the examination process where the information, even if indicative only, exists.	HDC	N/A	FASI-S is not required (nor is any other airspace change) to enable dual runway operations at Gatwick. Although the proposed FASI-S airspace changes lie outside of the scope of this Project, should information on the outcome of FASI-S project become available at a time when the information can be taken into account during the examination of the DCO application, the implications of this, in terms of the environmental effects such as those associated with noise and other emissions, will be reviewed and considered. Although the lateral tracks of the arrival and departure route structure around Gatwick will take some time to be determined through the airspace change process,	Section 6 of Environmental Statement Chapter 6: Approach to Environmental Assessment. Section 9 of ES Chapter 14: Noise and Vibration (APP-039).	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					improvements in the vertical design of routes can be expected to deliver both carbon and noise reduction benefits.		
13.96	Noise Contours	The modelled noise contours need to be expanded to include lower thresholds to allow consideration of total adverse impacts on the population. The noise and track keeping monitors should be increased to allow refinement of the model to lower sound levels and to provide for characterisation in those areas where no monitoring occurs presently but which will be affected by increased usage, including, but not exclusively North Horsham.	HDC	N/A	Adverse effects on populations, in accordance with government guidance, arise above the Lowest Observable Adverse Effects Level (LOAEL). The ANCON model for Gatwick has been validated to cover this area. In recent years further Noise and Track Keeping monitors have been deployed to maintain and improve the model accuracy and also for particular research projects, such as the Reduced Night Noise Trial. Paragraph 14.4.19 of Chapter 14 of the ES notes the nearest monitor to Horsham is at Faygate, 1.6km to the West.	Paragraph 14.4.19 of ES Chapter 14: Noise and Vibration (APP-039).	
13.97	Pattern of Flights	Diurnal pattern of flights during different periods is not clear therefore impact unclear.	HDC	N/A	Table 14.7.1 of Chapter 14 of the ES lists the numbers of flights in the day and in the night for the baseline and with the Project for all the assessment years.	Table 14.7.1 of ES Chapter 14: Noise and Vibration (APP-039).	
13.98	Noise Measurement Metrics	All metrics to be presented on 100% Easterly and Westerly modal split for metrics (including Leq and Nabove) to show how noise will be experienced.	HDC	N/A	See response to row 13.4 above.		
13.99	Air Noise	Information required on the total effect of all noise on residents.	HDC	N/A	ES Chapter 14: Noise and Vibration provides an assessment of all the noise effects expected from the Project	ES Chapter 14: Noise and Vibration (APP-039).	
13.100	Noise Insulation Scheme	As a minimum extent the noise insulation scheme should be based on the boundary of the single mode contours.	HDC	N/A	See response to row 13.54 above. This has been discussed in the TWG. The Government has been consulting on noise insulation schemes as part of its future aviation policy. In its consultation Aviation 2050 — the future of UK aviation (December 2018) it proposed a number of measures including: a) extending the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr. This is the average mode Leq 16 hr not single mode. The proposed scheme follows government guidance, in terms of the metric with which to define a noise insulation scheme, and in addition offers it at lower noise levels. For an airport such as Gatwick that has an uneven split between easterly and westerly operations in the summer (roughly 70/30) it	Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					would be unfair to use single mode contours that arise on 30% of days for some but 70% of say for others.		
13.101	Air Noise	A mechanism for linking slot release and slot management to aviation noise impacts to manage and reduce exposure to aviation noise.	HDC	N/A	This topic was discussed at in the Noise Envelope and TWG meetings, including presentation from GAL on slot management and the processes available to GAL to limit noise under the Noise Envelope. Section 7.3 of Environmental Statement - Appendix 14.9.7 The Noise Envelope restricts the airport from declaring future further capacity for additional air transport movements if the envelope is breached.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)	
13.102	Noise Insulation Scheme	Overheating assessments need to be performed for properties that will benefit from noise insulation and where necessary additional adaptation provided to deal with this issue (at the cost of the airport).	HDC	N/A	This subject was discussed in the TWG meeting on 4th January 2023 when GAL presented details of the Noise Insulating Scheme, as noted in the published minutes as follows: He [Steve Mitchell] showed in his office an example of an acoustic ventilator. He explained it has 7 settings and at the mid setting it provides 60m ³ /hr of air flow, enough to provide 3 air changes per hour in a typical bedroom. At this duty it produces about 20dB noise at 1m and used 5 Watts of power - i.e. about the same as an LED light bulb. . Further information on acoustic ventilators is provided in Appendix 14.9.10 Noise Insulation Scheme.	Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	
13.103	Health Cost	Health cost calculation needed to using the latest health data in an enhanced webtag for all noise sources.	HDC	N/A	The health cost has been qualified using the current WebTAG methodology for air noise and road traffic noise and the reasons for not adding ground noise are also explained in Section 14.12 of ES Chapter 14: Noise and Vibration with further details provided in Section 6 of Appendix 14.9.2 Air Noise Modelling. No accepted enhanced WebTAG methodology was available.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)	
13.104	Cumulative Effects	Sensitivity and environmental assessment of the impacts of FASI-S should be undertaken	MVDC	N/A	See response to row 13.95 above.	Section 6 of Environmental Statement	

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		to ensure due consideration is given to the cumulative impacts (or not) of both projects.				Chapter 6: Approach to Environmental Assessment. Section 9 of ES Chapter 14: Noise and Vibration (APP-039).	
13.105	Sharing Data request	The sharing of data is welcome and helpful but not all data requested has been shared in particular single mode contours.	MVDC	N/A	GAL has not produced single mode contours so cannot share them. We have not produced them for the reasons given in response to row 13.54 above, as discussed at the TWG.	See 13.54	
13.106	Operations Limitation	The Council has raised issues through TWG's that in order to prevent and minimise ground noise and air noise impacts on communities to the North, any Northern Runway usage needs to be limited to operations between 07:00 to 23:00 and only be used during the day for Chapter 3 aircraft or quieter. GALs submission suggests that this has been resolved through Requirement 19(3) of Schedule 2 to the draft DCO (APP - 006). MVDC remain unsure whether, as worded, it is sufficiently protective.	MVDC	N/A	Requirement 19(3) of Schedule 2 to the draft DCO limits the use as Northern Runway to between 0600 and 2300. All aircraft operating at Gatwick airport are Chapter 3 or quieter.	Requirement 19(3) of Schedule 2 to the draft DCO (APP - 006).	
13.107	Sensitivity Testing	Sensitivity testing of different growth rate scenarios would help provide a better understanding of how noise may affect local communities in future. It had been expected that this sensitivity testing would be provided in the ES. While GAL considers that this has been addressed, MVDC does not agree and slow case transition is unacceptable. There is no adequate comparison of future technology gains on the 2019 baseline i.e. noise levels are assumed to be constant within the fleet over the coming 10 years.	MVDC	N/A	The response to sensitivity testing is set out in response to row 13.6 above. The response to 2019 technology modelling in future years is set out in response to row 13.53 above.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)	
13.108	Over-Heating Assessment	Local authorities have requested an 'Over-heating Assessment' to demonstrate adequacy of the ventilation scheme. This hasn't been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications.	MVDC	N/A	See response to row 13.102 above.	Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	

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13.109	Noise Envelope	<p>The noise envelope thresholds are not agreed. In particular, using the slow transition case as the basis of the noise envelope rather than the more likely central case fleet provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.</p> <p>It has been suggested that the following will be discussed with the Noise Envelope Group:</p> <ol style="list-style-type: none"> 1. Details on how the benefits of new aircraft technologies are shared between the applicant and local communities should be provided; 2. Expected that a mechanism is adopted to allow for further reductions in the contour area limits to provide further community benefits with technology improvements in the future; 3. Information should be provided in the noise envelope on what actions would be taken in the event of an exceedance of the noise envelope limits; 4. Details on the enforcement regime should be provided; 5. More detail on how potential compliance with contour limits will be achieved would be beneficial and help provide reassurance that exceedances of noise contour limits can be avoided; 6. Existing restrictions on night flights, would expect to see these explicitly defined in the noise envelope; 7. Recommended that consultation is undertaken with local communities and relevant stakeholders to discuss the contents of the noise envelope; 8. Discussions should allow the opportunity local communities and relevant stakeholders to submit recommendations for noise envelope contents to GAL. 	MVDC	N/A	<p>We have explained within the Noise Envelope Group on several occasions that GAL does not control airline fleet procurement and that the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted 'We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case'.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <ol style="list-style-type: none"> 1. This has been discussed as part of the Noise Envelope Group. Engagement on the Noise Envelope is set out in ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) pages 165 to 175 provide GAL's illustration of sharing the benefits. 2. Section 8 of the Noise envelope provides a review process to enable this. 3. Section 7 of the Noise Envelope provides the actions that must be taken. 4. Sections 7 and 8 of the Noise Envelope describe how it will be managed and enforced including the role of the CAA as Independent reviewer and the Secretary of State as necessary. 5. Whilst Section 7 provides some ways in which compliance will be achieved, GAL will have other methods available, e.g. 	<p>Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175)</p> <p>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)</p> <p>Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178)</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		GAL has deferred these matters to discussions with the Noise Envelope Group. This is insufficient and relates to other concerns around sensitivity testing.			<p>as included in the adopted 2019-2024 and draft 2025-2029 Noise Action Plans under the Environmental Noise (England) Regulations 2006, and others that make use of emerging technologies.</p> <p>6. The Night Flight Restrictions are administered by the DfT and this will continue if there is a Noise Action Plan, quite separately. See Section 2 of the Noise Envelope.</p> <p>7. An extensive programme of consultation was undertaken in summer 2022. See ES Appendix 14.9.9 Report on Engagement on the Noise Envelope and Appendix 14.9.8 Noise Envelope Group Output Report.</p> <p>8. In the PEIR GAL outlined a Noise Envelope and invited suggestions. Discussions in the Noise Envelope Group provide opportunities for local community groups and other stakeholders to suggest details of the noise envelope and numerous suggestions were made and considered. See ES Appendix 14.9.9 Report on Engagement on the Noise Envelope and Appendix 14.9.8 Noise Envelope Group Output Report.</p> <p>GAL has consulted on the noise envelope through the PEIR as well as the Noise Envelope Group and with local authorities through the TWGs.</p>		
13.110	Noise Envelope	Noise envelope design process did not follow best practice guidance set out in CAP1129 or good practice from other airports. We would have expected local authorities and stakeholder groups to have been involved in the envelope design team from the outset and prior to the statutory consultation in September 2021 with the process examining all noise envelope options, metrics and limits from a first principles basis. The CAA recognises the potential need for	MVDC	N/A	MVDC has mentioned several times that GAL has not followed the guidance set out in CAP1129 for developing a noise envelope. Now that a comprehensive consultation has been completed, it would be helpful if MVDC could clarify which part of the guidance specifically they feel has still not been followed. Chapter 5 of CAP1129 Implementation gives guidance on how a noise envelope should be developed follows. GAL considers that this process has been fully followed.	<p>Appendix 14.9.8 Noise Envelope Group Output report summarises the inputs received from Stakeholders (APP-178).</p> <p>Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) summarises the correspondence between</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		independent, technical advisory third parties to assist stakeholders to reach agreement, but there was no such involvement at Gatwick. Luton and Heathrow, other airports to have carried out work on noise envelopes, set up independently chaired and advised, well-resourced, multi-stakeholder groups. The noise envelope group set up following consultation should have had an independent chair rather than being chaired by an airport employee. This would have given greater confidence in the process to community and local authority stakeholders.			Local Authorities were consulted on the noise envelope during preparation the outline proposal in the PEIR with the topic first discuss in the TWG meeting on 5th February 2020. The local authorities have employed AECOM to provide them with independent expert advice on aircraft noise using funding provided by GAL. We do not accept that the Chairing of the Noise Envelope Group by GAL in any way restricted the scope of its discussions or its reporting of the issues raised. Moreover, whilst the Noise Envelope Group itself was chaired by a GAL member of staff, the two sub-groups that fed into it were chaired by independent people rather than GAL employees. The local sub-group was chaired by the chair of the Noise Management Board Community Noise Group and the Aviation Sub-group was chaired by the chair of the Noise Management Board Noise Delivery Group.	participating stakeholders and GAL. The table at page 364 to 377 provides GAL's response to particular points made by the Local Authorities regarding metrics and their engagement with the process.	
13.111	Noise Envelope	The proposed monitoring, review and enforcement of the noise envelope is not agreed. We would like to see an environmentally managed or 'mitigate to grow' approach to implementation and enforcement (as was being developed by Heathrow for its R3 DCO and proposed by Luton in its Green Controlled Growth Framework). There should be 5 yearly or less reviews of the noise envelope built into the process once the DCO is made. A first review of the contour 9 years after opening or when 382,000 ATMs is achieved again provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.	MVDC	N/A	The progress of the Luton Airport example was discussed in both the Noise Envelope Group and the TWG meetings. The review, monitoring and enforcement process in respect of the Limits included as part of the Noise Envelope are included in sections 6 to 8 of the Noise Envelope (including the provision for 5 yearly reviews – section 6.2). The purpose of the fixed noise limits being 9 years after opening is to give certainty that noise levels will reduce. GAL consider the Slower Transition Fleet forecasts for this period are sufficiently certain that GAL can commit to these limits.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177). GAL provided detailed explanations of the regulatory framework the Airport Operated within, and options for a review body in the Noise Envelope Group meetings in July 2022 (see Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)). GAL's proposal is that the CAA will become the Independent Reviewer for the purposes of the noise envelope (see Appendix 14.9.7 The Noise Envelope (APP-177) paragraphs 6.1.6 – 6.2.4 and Sections 7 - 8).	
13.112	Increase in number of flights	Due to the effects of overflight and noise disturbance on people's health and wellbeing, it is very important for us to gain an accurate understanding of how many more flights would be passing over East	ESCC	N/A	Since the PEIR the resolution of the Overflight modelling has been increased to allow the overflight mapping grid size to be reduced from 3km to 1km. Section 2.2 of Environmental Statement - Appendix 14.9.2 Air Noise Modelling	Environmental Statement - Appendix 14.9.2 Air Noise Modelling (APP-172)	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		Sussex and which locations would be the most affected. There is insufficient detail in the PEIR regarding the increase in flights passing over East Sussex and are concerned about the accuracy and reliability of the estimated overflight mapping.			explains the methodology. GAL considers the mapping of overflight numbers across East Sussex and elsewhere to give a good indication of how overflight number will change.		
13.113	Online Map Tool	It is understood that an online map tool (18,000 post codes), which will enable people living further from the airport (up to 35 miles) to look up the change in the numbers of overflights would be developed and made available. We were unable to find any reference to this in the PEIR. Please can clarification be provided on when this will be developed?	ESCC	N/A	In consultation with the TWG GAL explained that it would be producing a web viewer in which NRP noise contours could be viewed online, including demonstrating how to use it. GAL has shared noise contours with LPA officers via the online noise viewer on 7th March 2023. Paragraph 14.9.80 of ES Chapter 14: Noise and Vibration gives the link to the online view, that has open access via the Gatwick website.	ES Chapter 14: Noise and Vibration (APP-039) paragraph 14.9.80.	
13.114	Noise Envelope	The Terms of Reference for the noise envelope review should be clearly defined and include a requirement for engagement and consultation with key stakeholders as part of the review process	ESCC	N/A	The Noise Envelope review process is described in Section 8 of the Noise Envelope.	Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177)	
13.115	Noise Construction	There is particular concern about the noise impacts associated with construction, given that a large proportion of the works will be undertaken during the night, for up to 14 years, while the Airport will continue to operate 24 hours a day. Local communities close to the Airport, particularly at Charlwood and Horley, are most likely to be affected from this source of noise disturbance and mitigation measures must be employed to reduce these impacts.	WSCC	N/A	The construction noise assessment provided in the ES builds in more detail than the PEIR as requested by local authority stakeholders. 170 areas of construction work across the airfield and highways areas have been modelled, each with construction activities occurring at the relevant times within the construction programme. The assessment provides specific mitigation measures to reduce noise impacts from night works as discussed in Section 14.8 and 14.9 of ES Chapter 14: Noise and Vibration and Environmental Statement - Appendix 14.9.1 Construction Noise Modelling.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.1 Construction Noise Modelling (APP-171)	
13.116	Flight Paths	Communities that live under the flight paths of the Airport are already affected by air noise. Increases in the number of flights will mean more disturbance events. Even if each noise incidence is quieter when accounting for newer technology in the future, the impact of multiple aircraft can have adverse effects. The proposals suggest that communities in the north of Sussex, that have little or no	WSCC	N/A	The NRP does not require any change to flight paths over north Sussex, so we do not expect communities with no noise at presents to be exposed to aircraft noise in this area. Paragraph 14.5.7 explains. Overflight mapping also confirm this for example by comparing Figure 4.9.31 with Figure 14.6.18.	ES Chapter 14: Noise and Vibration (APP-039). ES Figure 4.9.31 with Figure 14.6.18 in Environmental Statement - Noise and Vibration Figures - Part 1 (APP-063) and Environmental Statement - Noise and	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		noise exposure at present, will be exposed to regular and frequent aircraft noise in the future, which is of concern.				Vibration Figures - Part 2 (APP-064)	
13.117	Mitigation measures	Although mitigation measures for those overflown are supported in general, there is concern that the levels proposed are not adequate to minimise the impact on quality of life of those communities that will have increased external noise levels as a result of the NRP. Whether measures (such as those currently included within the Noise Mitigation Fund where criticism is already directed at the process and discharge of funds) are sufficient or will need to be more generous, will only become clearer as the noise impacts are fully understood.	WSCC	N/A	The Project's proposed Noise Insulation Scheme has been discussed with the TWG including on 4th January 2023. Paragraphs 14.9.162 to 14.9.171 of ES Chapter 14: Noise and Vibration describe the basis of the proposed two zone Noise Insulation Scheme. The full scheme is described in Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	
13.118	Noise Important Areas	The noise and vibration reporting shows that there are some moderate adverse effects in areas immediately to the south of the Airport but these are subject to further study. This assessment should take into account that some of these areas have already been identified by DEFRA as Noise Important Areas.	WSCC	N/A	This comment may relate to the PEIR rather than the ES. Immediately to the south of the airport air noise is expected to reduce slightly with the Project, some moderate ground noise impacts are predicted at the closest properties and noise insulation will be offered. The A23 in his area has been classified by WSCC as a Noise Important Area (ID 4638). Ground noise levels at properties along the A23 in this area will be below levels of road traffic noise, as discussed in Section 8.8 and 8.9 of ES Appendix 14.9.3 Ground Noise Modelling. Road traffic noise levels on the A23 in this area have been modelled and changes due to the Project are predicted to be insignificant as reported in Section 14.9 of ES Chapter 14: Noise and Vibration.	ES Chapter 14: Noise and Vibration (APP-039). Environmental Statement - Appendix 14.9.3 Ground Noise Modelling (APP-173)	
13.119	Noise Envelope	Noise envelope design process did not follow best practice guidance set out in CAP1129 or good practice from other airports. We would have expected local authorities and stakeholder groups to have been involved in the envelope design team from the outset and prior to the statutory consultation in September 2021 with the process examining all noise envelope options, metrics and limits from a first principles basis. The CAA recognises the potential need for	SCC	N/A	This has been responded to at row 13.110 above.		

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		independent, technical advisory third parties to assist stakeholders to reach agreement, but there was no such involvement at Gatwick. Luton and Heathrow, other airports to have carried out work on noise envelopes, set up independently chaired and advised, well-resourced, multi-stakeholder groups. The noise envelope group set up following consultation should have had an independent chair rather than being chaired by an airport employee. This would have given greater confidence in the process to community and local authority stakeholders.					
13.120	Noise Envelope	GAL is not providing the necessary info and analysis for effective noise envelope engagement	SCC	N/A	The information and analysis provided through the Noise Envelope Group in summer 2022 provided for a substantive consultation on all aspects of the noise envelope.	Environmental Statement - Appendix 14.9.5 Air Noise Envelope Background (APP-175) Environmental Statement - Appendix 14.9.7 The Noise Envelope (APP-177) Environmental Statement - Appendix 14.9.8 Noise Envelope Group Output Report (APP-178) Environmental Statement - Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)	
13.121	Noise Envelope Thresholds	The noise envelope thresholds are not agreed. In particular, using the slow transition case as the basis of the noise envelope rather than the more likely central case fleet provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.	SCC	N/A	This issue has been responded to at row 13.109 above.		
13.122	Noise Envelope	The proposed monitoring, review and enforcement of the noise envelope is not agreed. We would like to see an environmentally managed or 'mitigate to grow' approach to implementation and enforcement (as was being developed by Heathrow for its R3 DCO and proposed by	SCC	N/A	This issue has been responded to at row 13.111 above.		

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		Luton in its Green Controlled Growth Framework). There should be 5 yearly or less reviews of the noise envelope built into the process once the DCO is made. A first review of the contour 9 years after opening or when 382,000 ATMs is achieved again provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.					
13.123	Airspace Changes	It is acknowledged that airspace changes through FASI-S will be needed to accommodate the anticipated growth in ATMs in the LTMA from Gatwick and other airports. The insulation scheme must therefore be flexible enough to mitigate different impacts post FASI-S.	SCC	N/A	FASI-S is not required (nor is any other airspace change) to enable dual runway operations at Gatwick. See response at issue 13.95. The NRP Noise Insulation Scheme has been developed in line with current best practice an enhanced NIS is to be introduced as part of the Project, with details included in ES Appendix 14.9.10: Noise Insulation Scheme.	Environmental Statement - Appendix 14.9.10 Noise Insulation Scheme (APP-180)	

Table 14: Carbon and Climate Change

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.1	Net zero	The precautionary principle must be applied, with expansion only being allowed in line with a demonstrable emissions reduction plan, to be agreed in advance, that sets out a proven trajectory to net zero. If the agreed emissions reduction trajectory is not met, then the operation would need to cut back until it was back in line with commitments.	CBC	N/A	The assessment undertaken has considered the GHG impacts arising from the proposed development in line with industry-specific guidance, and the EIA Regulations. Each of the sector-specific topics within the GHG assessment has been considered against a future trajectory in order to assess the significance of future emissions within this sector. The Government has committed to net zero for aviation and to managing a trajectory to that effect, whilst GAL's Carbon Action Plan (APP-091) sets out an exemplary approach to managing emissions within GAL's control.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.2	Greenhouse Gases	GAL should assess all types of GHGs which have the potential to contribute to a likely significant effect on climate. This is in line with the Planning Inspectorate's comments	CBC	N/A	The assessment includes consideration of the GHG included within the Kyoto-basket of gases. Non-CO2 impacts are discussed within the Environmental Statement, however these are not quantified within the wider assessment for the reasons set out in the Environmental Statement.	ES Chapter 16: Greenhouse Gases [APP-041], paragraphs 16.4.12 to 16.4.14	
14.3	Environmental Cost Calculations	GAL should review the environmental cost calculations to ensure the most up to date carbon values are used.	CBC	N/A	<p>The appraisal values used in the analysis were provided by the former Department for Business, Energy & Industrial Strategy, and are sourced from Department for Transport (2022), 'TAG Data Book, A3.4 Greenhouse Gases', May. These values have been updated from those employed in the PEIR analysis (July 2021).</p> <p>In a previous response, it was acknowledged that in September 2021, BEIS updated the relevant carbon cost values used in the appraisal of GHG emissions. In November 2021, the DfT published an updated version of DfT's model, which included the updated September 2021 BEIS carbon values. This update to DfT's model occurred after the release of the PEIR. While the carbon values employed in the PEIR were up-to-date as of the date of publication of that report, the</p>	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					subsequent update to these values was acknowledged and factored in when planning updates for the ES.		
14.4	Carbon reduction commitments	CBC believes that, given this significant risk of not being able to meet the required carbon reductions on this pathway, Gatwick's expansion should be phased and linked to thresholds for meeting carbon reduction commitments in line with the net zero target for aviation. If these carbon reductions thresholds are met, then further expansion in terms of increases in passenger numbers would be allowed. There is also the question around whether additional on-airport infrastructure would be needed to support these emerging aircraft technologies, in terms of electricity supply or hydrogen production and storage. CBC would want re-assurance that this technology is capable of being accommodated in the airfield. This should be explored by Gatwick as part of their DCO submission.	CBC	N/A	<p>The net zero target for aviation (including emissions associated with the operation of airports) is addressed at a sector/national level via the UK Government's Jet Zero Strategy. This strategy established the commitments and mechanisms whereby the UK Government will monitor and ensure progress – at national scale – towards a net-zero compliant trajectory for the sector. The strategy, necessarily, takes a sector-wide approach so as to allow flexibility within the planning and delivery of capacity across UK airports.</p> <p>With regards to provision of infrastructure for future technology, it is clear within the Jet Zero strategy that innovation is required within the aviation sector to ensure that alternative fuel aircraft, and zero-emission aircraft, can deliver some of the emissions reductions required to achieve net zero for the sector. However, these technologies are still in development and there is insufficient clarity on the supporting infrastructure needs at this time. The Carbon Action Plan records the best practice that GAL is already committed to, to keep a close watching brief on industry innovation and to continue to invest ahead of requirements to ensure that Gatwick is always 'Jet Zero ready'.</p>	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.5	Carbon Action Plan	Given the significant slice of the nation's carbon budget (at 2050) taken up by Gatwick's planned expansion, CBC feels that stakeholders should be consulted on Gatwick's 'Carbon Action Plan' as soon as possible, and before the DCO submission.	CBC	N/A	The Carbon Action Plan is included as part of the DCO Application to allow for engagement and examination.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.6	EIA and Climate Resilience Strategy	It would be useful to see the draft EIA and Climate Resilience Strategy to see to what extent the adaption/mitigation GAL are proposing is addressing the risk that GAL have identified. It is disappointing that the current position is that this will not be shared in advance of the DCO submission/acceptance.	CBC	N/A	Outline Climate Resilience Design Principles and measures are captured within the Design and Access Statement. Water design principles are included within the Code of Construction practice and ES Appendix. Relevant mitigation measures are detailed in Climate Change Resilience contained as an Appendix to the ES.	Design and Access Statement [APP-256], paragraph 6.6.5 and Appendix 1 – Design Principles. ES Appendix 5.3.2: Code of	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						<p>Construction Practice [APP-082]</p> <p>ES Appendix 15.8.1: Climate Change Resilience Assessment [APP-187]</p>	
14.7	Extreme climate impacts	It doesn't appear that the impact of extreme climate impacts on critical infrastructure has been addressed. This is required to ensure that safety critical features will not be affected by more radical changes to the climate beyond that projected in UKCP18. Have H++ climate scenarios to test the sensitivity of vulnerable safety critical features?	CBC	N/A	A sensitivity analysis has been undertaken as part of the EIA that uses newer climate (not weather) extremes from the latest climate extremes dataset from the UK Met Office, testing the sensitivity of seasonal climate extreme maximum temperature, 1-day and 5-day precipitation rates; examining the projected extreme values of a 1 in 100-year event for each variable respectively.	<p>ES Chapter 15: Climate Change [APP-040], paragraphs 15.5.13 to 15.5.17</p> <p>ES Appendix 15.5.1: Sensitivity Analysis – Climate Extremes [APP-185]</p>	
14.8	Capacity restrictions and emission budget	Airport expansion will require capacity restrictions elsewhere to reach carbon reductions necessary to achieve balanced pathway. Emissions budget likely to be lower than assumed in PEIR. There has also been no consideration of proposals to increase capacity at other airports as part of airspace modernisation review.	HDC	N/A	The net zero target for aviation (including emissions associated with the operation of airports) are addressed at a sector/national level via the UK Government's Jet Zero Strategy. This strategy established the commitments and mechanisms whereby the UK Government will monitor and ensure progress – at national scale – towards a net-zero compliant trajectory for the sector. The strategy, necessarily, takes a sector-wide approach so as to allow flexibility within the planning and delivery of capacity across UK airports. Government policy confirms that aviation demand can be met consistent with commitments to Jet Zero, and that there is no need for demand management.	<p>Planning Statement, Chapter 3 [APP-245]</p> <p>Needs Case, Chapter 3 [APP-250]</p>	
14.9	Aviation carbon emissions	Aviation emissions should be reported in CO2e and not reporting in this way means global warming effects are underestimated.	HDC	N/A	<p>Emissions for the assessment of the Kyoto-basket of GHGs is reported in CO2e within the Environmental Statement.</p> <p>For other non-CO2 emissions please refer to the Environmental Statement.</p>	<p>ES Chapter 16: Greenhouse Gases [APP-040], paragraphs 16.4.12 to 16.4.14</p>	
14.10	Aviation carbon emissions	The suite of factors being considered to reduce aviation carbon emissions should include more emphasis on demand management and not rely solely on technological solutions	HDC	N/A	See above at 14.9. The assessment approach has been informed by the UK Jet Zero Strategy – which sets out a UK-scale strategy to address future emissions from aviation. This	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					strategy presents the most comprehensive assessment of the scale of future impact at UK scale, and includes within it mechanisms that will seek to reduce emissions but which do not necessitate specific demand management measures – as UK Government believes net zero can be achieved for the sector without the introduction of these measures.		
14.11	Mitigation	The mitigation covered in the PEIR is high level, with a note that further analysis will be undertaken in the ES, with a Carbon and Climate Change Action Plan in development. This means there is very little information on mitigation for local authorities to scrutinise in terms of effectiveness and whether mitigation can be demonstrably secured.	HDC	N/A	A Carbon Action Plan (CAP) has been submitted as part of the DCO application which sets out binding commitments in relation to carbon. The CAP focusses on three key airport emission sources: airport buildings and ground operations ("ABAGO"), aviation and construction. Under each heading the CAP sets clear outcomes that GAL is committing to deliver. To achieve those outcomes, we will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve.	ES Appendix 5.4.2 Carbon Action Plan [APP-091]	
14.12	LPAs Climate Change Action Plans	No indication that local authorities' own climate change action plans have been taken into consideration, or that any work has been undertaken to align GAL's plans with locally set targets and to provide synergy between local plans and targets and proposed mitigation.	HDC	N/A	The assessment approach has considered impacts arising from the Proposed Development at a scale and level appropriate to the global nature of the receptor (the global atmosphere). GHG impacts are not geographically limited meaning there is no local climate change effect that is greater than the impact of the project as a whole at national scale. Therefore the assessment does not consider it necessary to examine alignment with targets proposed at individual local authority levels. Rather, emissions are considered relative to national budgets and industry/sector commitments.	Paragraph 16.4.68 of ES Chapter 16: Greenhouse Gases [APP-041]	
14.13	Carbon model	Will there be a carbon model produced for the airport capturing data from all operations and journeys?	HDC	N/A	There is no single model used for assessing all aspects of the operation and journeys/flights for the airport due to the complexity of the modelling of individual elements. However, an aggregation of several distinct models has been used to inform the assessment as set out in the Environmental Statement.	ES Chapter 16 Greenhouse Gases [APP-041]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.14	GHG emissions	Will GAL be reporting GHG emissions for the opening year, peak and worst-case scenarios, in line with the Airports National Policy Statement (ANPS)?	HDC	N/A	The emissions for each year are reported within the Environmental Assessment and supporting appendices for each year between baseline year, 2018, and 2050.	<p>ES Appendix 16.9.2: Assessment of Greenhouse Gas Emissions for Airport Buildings and Ground Operations [APP-192]</p> <p>ES Appendix 16.9.3: Assessment of Surface Access Greenhouse Gas Emissions [APP-193]</p> <p>ES Appendix 16.9.4: Aviation Greenhouse Gas Emissions [APP-194]</p>	
14.15	Aviation carbon emissions	How will GAL demonstrate that any increase in carbon emissions will not materially impact “the ability of Government to meet its carbon reduction targets, including carbon budgets” as required by the significance test set in the ANPS.	HDC	N/A	The assessment of impacts arising from the Proposed Development has considered the sector-specific trajectories for each of the four sector topics within the Environmental Statement. The majority of emissions arise from aviation. The UK Jet Zero Strategy provides the mechanism whereby UK Government can ensure aviation remains within a budget aligned with the UK’s net zero legislation and commitments.	Paragraphs 16.9.93 to 16.9.97 of ES Chapter 16: Greenhouse Gases [APP-041]	
14.16	GHG emissions modelling	Does GAL intend to model different GHG emission scenarios so the impact of the NRP can be understood in the event of new technologies not being implemented and government policy not being met, given the reliance on new/emerging technologies for decarbonising surface access transport and aviation?	HDC	N/A	The assessment is based on the "High Ambition" scenario the UK Government has committed to achieve pursuant to the Jet Zero Strategy. The assessment also considers the impact of the Transport Decarbonisation Plan which sets out the UK Government's commitment to decarbonise transport by 2050.	Paragraphs 16.4.6 to 16.4.8 of ES Chapter 16: Greenhouse Gases [APP-041]	
14.17	Jet Zero	How will GAL ensure airport operations are zero emission by 2040, particularly given there is uncertainty around the exact scope of ‘airport operations’ in Jet Zero?	HDC	N/A	GAL has committed to achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040 as part of its Carbon Action Plan. This is in line with the UK Government’s stated ambition in the Jet Zero Strategy “for all airport operations in England to be zero emissions by 2040”. GAL has set out within the Carbon Action Plan what emissions fall within the	Section 4.2 of ES Appendix 5.4.2: Carbon Action Plan [APP-091]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					scope of its commitment, but has further committed to updating this commitment when the policy for and definition of 'airport operations' is finalised and published by the UK Government.		
14.18	Aviation emissions modelling	What assumptions are being made after 2040 on modelling of aviation emissions, i.e. on the uptake of electric aircraft for domestic flights?	HDC	N/A	The modelling of emissions from aircraft post-2040 follow the assumptions for low/zero emission aircraft contained within the Jet Zero High Ambition scenario.	ES Appendix 5.4.2 Carbon Action Plan [APP-091]	
14.19	SAFs	What measures are GAL putting in place to future proof the NRP for the expected increase in demand for sustainable aviation fuels (SAFs) by airlines using the airport? What assumptions are being made about the use of SAFs? Could there be a cost premium on their use?	HDC	N/A	<p>The modelling of emissions from aircraft follow the assumptions for low/zero emission aircraft contained within the Jet Zero High Ambition scenario. This includes expected uptake of SAF (see the response to 14.5).</p> <p>Gatwick Airport is already capable of supporting SAF adoption and demonstrated this in November 2021, when almost 50 easyJet flights from the airport were powered by SAF. SAF was blended with Jet A-1 fuel at a depot upstream of Gatwick to create a drop-in fuel compatible with existing aircraft engines and the airport infrastructure, without requiring additional investment. The fuel was then delivered to the main storage fuel storage tanks located to the NE of the airport and was then supplied to the aircraft via the airport's hydrant system.</p> <p>The hydrant system will be expanded to provide connections to new or reconfigured stands constructed at the airport. This is an example of how GAL will ensure the airport is 'jet zero' ready to fulfil its commitment under the Carbon Action Plan.</p>	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.20	Surface access emissions monitoring	How will surface access emissions be monitored in the future and what mitigation plans are in place if these emissions exceed targets?	HDC	N/A	GAL's commitments in relation to surface access emissions and their respective review, monitoring and governance processes are set out in the DCO Surface Access Commitments.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
14.21	Active travel	What active travel assumptions are being made about surface access journeys?	HDC	N/A	The Surface Access Commitments sets out the Project commitment to achieve 15% of staff journeys to work originating within 8 km of the Airport being made by active modes three years after the commencement of dual runway	Transport Assessment [APP-258]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					operations. Active travel assumptions are set out in Chapter 14 of the Transport Assessment. Walking and cycling improvements are incorporated in the highway works that form part of the Project. These improvements aim to link to existing and proposed networks provided by the local authorities, take into account DfT Cycle Infrastructure Design guidance (LTN 1/20) and have been discussed with stakeholders. Paragraph 8.6.16 of the Transport Assessment shows that the strategic transport modelling output indicates around 9% to 10% of staff journeys made to and from locations within 8km of the airport. However, the models do not include specific walking and cycling improvements (whether infrastructure, facilities, or incentives), which will ensure the higher active mode share committed to in the Surface Access Commitments is achieved.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
14.22	Sensitivity test – low and zero emissions vehicles	What sensitivity testing has taken place to model different levels of uptake of low and zero emissions vehicles?	HDC	N/A	The modelling carried out for the Environmental Statement considers future uptake of low and zero emissions vehicles that align with the UK Transport Decarbonisation Plan. Sensitivity modelling has not been undertaken to consider alternative uptake trajectories.	ES Chapter 12: Traffic and Transport [APP-037] ES Chapter 16: Greenhouse Gases [APP-041]	
14.23	EV charging provision	What provision will be made for EV charging?	HDC	N/A	Section 17.2 of the Transport Assessment provides information on Electric vehicles (EVs) and zero emission vehicles (ZEVs). Paragraph 17.2.14 states GAL is already considering electric vehicles in the current Airport Surface Access Strategy (ASAS), with current initiatives including working with Gridserve to provide an electric charging forecourt close to the South Terminal Long Stay car parks, and developing a programme for introducing more electric charging points in short-stay passenger car parks and staff car parks, including trials of rapid charging points for airport staff. Paragraph 17.2.15 states that GAL is considering options for electric vehicle charging as part of an airport-wide strategy that includes airside operational vehicles, staff, and	Transport Assessment [APP-258]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					passengers, either within existing car parks or through new, dedicated facilities and travel options. The strategy acknowledges the importance of providing charging equipment flexibly, responding to identified needs or benefits while also taking opportunities to innovate. These measures will help to reduce emissions from road traffic and contribute to carbon and air quality emission reduction targets.		
14.24	Construction emissions	How will GAL model emissions from construction to ensure these do not exceed estimates?	HDC	N/A	GAL expects to impose contractual requirements to ensure that its DCO commitments in relation to construction carbon are met.	N/A	
14.25	SA emissions	GAL has acknowledged some, albeit limited, influence over modes of vehicular access to the airport. Arguably GAL has as much, if not more, influence over SA emissions than on aviation emissions. What targets, monitoring and remedial actions will be taken (i.e. physical or behavioural) if targets are not met?	HDC	N/A	Gatwick Airport has consistently set the benchmark for sustainable surface access to airports through a succession of Surface Access Strategies, which contain a successful combination of measures to optimise travel by non-car modes. That track record is strengthened in the DCO Application by a set of comprehensive surface access commitments.	ES Appendix 5.4.1: Surface Access Commitments [APP-090].	
14.26	Changes in routes and aircraft size	How have changes in routes and subsequent aircraft size changes been accounted for?	HDC	N/A	The modelling of future aviation emissions reflects the forecast fleet and destination profile that has been used across all aspects of the Environmental Statement. These forecasts provide an indication on the expected passenger numbers, flight numbers, aircraft type and destination geography for each year to 2050. This reflects changes in forecast routes and aircraft expected in future years – it does not simply represent a scaling of baseline emissions.	N/A	
14.27	CAP	Disappointing that local authorities have not had sight of the CAP before submission. This has limited the opportunities for consideration and discussion.	HDC	N/A	The Carbon Action Plan was the subject of two TTWG meetings and has been made available as part of the DCO application.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.28	Freight Transportation	Has freight transportation been considered, not just staff and passenger emissions as mentioned under umbrella of surface access?	HDC	N/A	Freight transportation has been considered within the assessment of Surface Access emissions as set out in the Environmental Statement, and in the Surface Access Appendix.	ES Appendix 16.9.4: Assessment of Surface Access Greenhouse Gas	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
						Emissions [APP-040] Paragraphs 2.1.5	
14.29	Offsetting surface access journeys	Is GAL considering offsetting surface access journeys like other airports?	HDC	N/A	GAL has not proposed a commitment to offset surface access emissions, and such a commitment is not required by national policy.	N/A	
14.30	Government's legal commitments on climate change	Question of whether Gatwick expansion is compatible with the Government's legal commitments on climate change – the Government's own advisory body (the Climate Change Committee) has expressed caution on airport expansion (not specifically at Gatwick, just generally).	ESCC	N/A	The net zero target for aviation (including emissions associated with the operation of airports) are addressed at a sector/national level via the UK Government's Jet Zero Strategy. This strategy established the commitments and mechanisms whereby the UK Government will monitor and ensure progress – at national scale – towards a net-zero compliant trajectory for the sector. The strategy, necessarily, takes a sector-wide approach so as to allow flexibility within the planning and delivery of capacity across UK airports.	N/A	
14.31	GHG Mitigation	Due to the lack of detail on identified Green House Gas (GHG) mitigation we have been unable to determine the full impact of the proposed scheme on the climate.	ESCC	N/A	The relevant chapter of the ES and supporting appendices (Chapter 16) provides all the information required for this purpose.	ES Chapter 16: Greenhouse Gases [APP-041]	
14.32	Climate Change Resilience	Due to the lack of detail on identified CCR mitigation we have been unable to fully assess the climate change resilience of the NRP.	ESCC	N/A	Relevant mitigation measures were identified within the ES (see Table 15.8.4: Mitigation Measures for Climate Change Resilience Assessment and Table 15.9.1: Mitigation, monitoring and enhancement measures for ICCI assessment). Outline Climate Resilience Design Principles and measures are now captured within the Design and Access Statement. Additional water-related measures are captured in the Code of Construction Practice.	ES Chapter 15: Climate Change [APP-040] Tables 15.8.4 and 15.9.1 Design and Access Statement [APP-256], paragraph 6.6.5 and Appendix 1 ES Appendix 5.3.2: Code of Construction Practice [APP-082] ES Appendix 15.8.1: Climate Change Resilience Assessment [APP-187]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.33	Preliminary economic impact assessment	The negative impacts of emissions on climate change arising from aircraft flights and the ancillary operations and traffic movements associated with air travel (at Gatwick) need careful consideration. Need reassurances that the forecasts and values used by GAL in the preliminary economic impact assessment have been assessed appropriately.	ESCC	N/A	The impacts modelled at PEIR stage have been updated, and in some cases remodelled, for the Environmental Statement in order to make use of the most accurate and up-to-date information available. The methodology for each element of the GHG emissions is set out within the Chapter (Chapter 16) and the respective Appendices.	ES Chapter 16: Greenhouse Gases [APP-041]	
14.34	Aircraft emissions modelling	In the Gatwick aircraft emissions modelling only two scenarios have been modelled: one where technologies unproven at scale are rolled out quickly, and one where the same technologies are adopted a little more slowly. A wider range of scenarios, for example ones where those unproven technologies have little impact, should be modelled.	ESCC	N/A	The assessment is based on the scenario adopted by UK Government to inform the Jet Zero Strategy. There is no expectation at this point to model alternative strategies with varying levels of technological development/uptake.	ES Chapter 16: Greenhouse Gases [APP-041]	
14.35	Carbon Action Plan	GAL need to work with key stakeholders on the Carbon Action Plan to consider ways to reduce carbon emissions that are in and outside of their control, such as those arising from aircraft at take-off, and from vehicles undertaking surface access trip to/from the airport.	ESCC	N/A	The Carbon Action Plan sets out a best practice to limiting carbon emissions at the airport. It will also be updated when necessary to reflect any changes in government policy requirements. GAL expects to work directly with government to ensure its carbon strategies and performance align with national strategies. As part of this, GAL is committed to producing an annual monitoring report, setting out performance and progress against its commitments in the Carbon Action Plan, and submitting a copy to the Government, to inform the Government in implementing its Net Zero commitments in aviation.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.36	GHG	Concerns about the significant increase in greenhouse gas emissions and impacts on climate change and understanding how airport expansion can be justified in the light of national and international carbon reduction targets (ref to govt ambition of being carbon neutral by 2050). No account of PINs SO comment or cumulative impacts, non-kyoto gases, emissions or arrival flights.	WSCC	N/A	The assessment is based on the scenario adopted by UK Government to inform the Jet Zero Strategy. There is no expectation at this point to model alternative strategies with varying levels of technological development/uptake.	N/A	
14.37	Reports/plans reference	no ref to the Carbon and Climate Change Action Plan, The Third Climate Change Adaptation Report, the Sustainability Statement, and the Landscape and Environmental Management Plan.	WSCC	N/A	The GHG and Climate Resilience Chapters are now separate. The Carbon Action Plan is referenced in Table 15.8.4 which refers to mitigation measures for the Climate Change Resilience Assessment.	Table 15.8.4 of ES Chapter 15: Climate Change [APP-040]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>The Third Climate Change Adaptation Report is referenced within ES Chapter 15: Climate Change paragraphs 15.2.3 and 15.5.6 and has been considered within the assessment process (as described in ES Chapter 15: Climate Change paragraph 15.4.2).</p> <p>The Landscape Environmental Management Plan is now the Outline Landscape and Ecology Management Plan (oLEMP) contained in ES Appendix 8.8.1. This is referenced in Chapter 15 in Table 15.8.4: Mitigation Measures for Climate Change Resilience Assessment. The oLEMP contains mitigation measures that support climate change resilience (in paragraph 4.4.2, and 5.1.2).</p>	<p>ES Chapter 15: Climate Change [APP-040] paragraphs 15.2.3, 15.4.2 and 15.5.6</p> <p>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113]</p>	
14.38	Jet Zero Policy	(General) It is not clear if account has been taken of the cost of carbon and future abatement measures in the forecasts, which makes them inconsistent with the Government's Jet Zero Policy.	WSCC	N/A	GAL's forecasts are directly consistent with national forecasts which underpin the Jet Zero Strategy and which take full account of the cost of carbon.	N/A	
14.39	Urban heat island effect	WSCC requires further justification that Gatwick Airport does not experience a detectable urban heat island effect. This needs to be presented within the ES.	WSCC	N/A	An Urban Heat Island (UHI) Assessment for the Project has been included as part of the ES and it concludes that the Project would not create a new UHI effect, but that the increased impervious surface cover and buildings due to the extension of the taxiways, hotels and car parks, among other features alongside projected increases in temperature from climate change could exacerbate the increase in the UHI effect at the Project site itself, particularly at night. However, this UHI effect is low (ES Chapter 15: Climate Change [APP-040] and ES Appendix 15.5.2 Urban Heat Island Assessment [APP-186]).	<p>ES Chapter 15: Climate Change [APP-040]</p> <p>ES Appendix 15.5.2: Urban Heat Island Assessment [APP-186]</p>	
14.40	Climate Change Impacts Assessment	WSCC questions the impact scoring for the In-combination Climate Change Impacts Assessment. For a project of this scale, how can non-significant impacts be assessed?	WSCC	N/A	The in-combination climate impacts (ICCI) assessment followed the same approach to assessing impacts and determining significance as for each of the ES topics, but with the added consideration of future climate change projections. The assessment of significance was completed by the climate change specialist and environmental specialists from the relevant topics working	<p>ES Chapter 15: Climate Change [APP-040], paragraph 15.9.9 to 15.9.14</p> <p>ES Appendix 15.9.1: In-Combination Climate Impact</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<p>together to provide a qualitative assessment of consequence and therefore significance of the ICCI.</p> <p>The effect of an ICCI was considered significant if:</p> <ul style="list-style-type: none"> - An effect which was previously not significant becomes significant in terms of the significance criteria used by the ES topic owing to the influence of climate change (e.g. an increase in consequence of effect or an increase in scale of change); and/or - An existing significant effect is exacerbated in terms of the significance criteria used by the ES topic owing to the influence of climate change (e.g. a further increase in the consequence of effect or a further increase in scale of change). <p>Further details on the method for measuring significance can be found in ES Chapter 15: Climate Change, paragraph 15.9.9 to 15.9.14 and ES Appendix 15.9.1: In-Combination Climate Impact Assessment.</p>	Assessment [APP-181]	
14.41	New impermeable areas	The strategy to include new impermeable areas (road and airfield infrastructure) will reduce additional surface water runoff, thus increasing resilience to extreme weather events in future – impermeable areas are likely to increase surface water runoff, not reduce it.	WSCC	N/A	Noted. All references to impermeable areas within Chapter 15 state that this will be associated with additional surface runoff. The mitigation measures adopted as part of the project to account for this are detailed within Table 15.9.1: Mitigation, monitoring and enhancement measures for ICCI assessment. This mitigation is secured within the Design Principles in the Design and Access Statement [APP-256].	Table 15.9.1 within ES Chapter 15: Climate Change [APP-040] Design and Access Statement [APP-256] Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	
14.42	Low and zero carbon design	The text states that Low and zero carbon design and performance standards will be applied to new infrastructure. WSCC would expect exemplar Zero carbon design throughout and renewable energy infrastructure as standard, not as mitigation for new development.	WSCC	N/A	The Carbon Action Plan, sets out an exemplary approach to limiting carbon emissions in construction and airport operation.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.43	Climate hazards	Climate hazards seem limited in application. High temperature is relevant to airport infrastructure and high winds are applicable to airport operations.	WSCC	N/A	<p>A range of climate hazards have been assessed within ES Appendix 15.8.1 Climate Change Resilience Assessment.</p> <p>These include:</p> <ul style="list-style-type: none"> - Increasing number of extremely hot days - Increased probability of extreme weather events (e.g. heatwaves, flooding) - Extreme cold weather - Increased frequency of flooding from river, surface and groundwater sources - Increased risk of drought - Extreme wind speeds - Increased risk of lightning strikes. 	ES Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]	
14.44	Climate Change	What consideration has been given to climate change for this particular facility [CARE Facility] – How would this feed into the wider assessments and in combination effects?	WSCC	N/A	<p>Potential climate change impacts on airport buildings including the CARE facility have been considered as part of ES Chapter 15 Climate Change. This includes impacts associated with overheating leading to thermal discomfort and heat stress for passengers and staff during the operation of the airport that could lead to negative health implications, and negative customer experience, and increased water stress.</p> <p>In-combination Climate Change Impacts Assessment (ICCI) assesses the extent to which climate change exacerbates a potential effect of the Project on an environmental receptor. The methodology for the ICCI is set out in Section 15.9 of ES Chapter 15 Climate Change, the assessment itself is presented in ES Appendix 15.9.1 In-combination Climate Change Impacts Assessment.</p>	<p>Table 15.8.6 of ES Chapter 15: Climate Change [APP-040]</p> <p>ES Appendix 15.9.1: In-combination Climate Change Impacts Assessment [APP-181]</p>	
14.45	GHG emissions	Calculating and reporting GHG emissions from an airport project should be undertaken in line with ANPS. The approach taken by GAL therefore complies with expected approach for assessing GHG emissions.	MSDC	N/A	Noted. No response required.	N/A	
14.46	GHG emissions	Can GAL confirm they will be reporting GHG emissions for the opening year, peak and worst-case scenarios in line with the ANPS?	MSDC	N/A	The emissions for each year are reported within the Environmental Assessment and	ES Appendix 16.9.2: Assessment of Greenhouse Gas	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					supporting appendices for each year between baseline year, 2018, and 2050.	Emissions for Airport Buildings and Ground Operations [APP-192] ES Appendix 16.9.3: Assessment of Surface Access Greenhouse Gas Emissions [APP-193] ES Appendix 16.9.4 Aviation Greenhouse Gas Emissions [APP-194]	
14.47	GHG emissions	How will GAL demonstrate the significance of emissions from NRP will not be 'so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets?	MSDC	N/A	The assessment of impacts arising from the Proposed Development has considered the sector-specific trajectories for each of the four sector topics within the Environmental Statement. The majority of emissions arise from aviation. The UK Jet Zero Strategy provides the mechanism whereby UK Government can ensure aviation remains within a budget aligned with the UK's net zero legislation and commitments.	Para 16.9.93 to 16.9.97 of ES Chapter 16: Greenhouse Gases [APP-041]	
14,48	GHG emissions	Given the uncertainty around government policy (i.e. due to the reliance on new/emerging technologies for decarbonising surface access transportation and aviation) does GAL have any intention of modelling different GHG emissions scenarios so that the impact of the NRP can be understood where new technologies are not implemented, and government policy is not met?	MSDC	N/A	It is clear within the UK Government's Jet Zero Strategy that innovation is required within the aviation sector to ensure that alternative fuel aircraft, and zero-emission aircraft, can deliver some of the emissions reductions required to achieve net zero for the sector. However, these technologies are still in development and there is insufficient clarity on the supporting infrastructure needs at this time. The Carbon Action Plan records the best practice that GAL is already committed to, to keep a close watching brief on industry innovation and to continue to invest ahead of requirements to ensure that Gatwick is always 'Jet Zero ready'.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.49	Jet Zero	While there is still uncertainty as to the exact scope of what is included in 'airport operations' in Jet Zero (Jet Zero places a requirement for airports to be zero emissions by 2040), what is GAL going to	MSDC	N/A	GAL has committed to achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040 as part of its Carbon Action Plan. This is in line with the UK Government's stated	Section 4.2 of ES Appendix 5.4.2: Carbon Action Plan [APP-091]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		put in place to ensure its airport operations are zero emissions by 2040?			ambition in the Jet Zero Strategy "for all airport operations in England to be zero emissions by 2040". GAL has set out within the Carbon Action Plan what emissions fall within the scope of its commitment, but has further committed to updating this commitment when the policy for and definition of 'airport operations' is finalised and published by the UK Government.		
14.50	Residual emissions	Has GAL any plans to reduce residual emissions from Airport operations?	MSDC	N/A	The assessment undertaken has considered the GHG impacts arising from the proposed development in line with industry-specific guidance, and the EIA Regulations. Each of the sector-specific topics within the GHG assessment has been considered against a future trajectory in order to assess the significance of future emissions within this sector. The Government has committed to net zero for aviation and to managing a trajectory to that effect, whilst GAL's Carbon Action Plan sets out an exemplary approach to managing emissions within GAL's control.	ES Chapter 16: Greenhouse Gases [APP-041] ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.51	Electric and hydrogen aircraft	Given the uncertainty around electric and hydrogen aircraft, what assumptions will GAL make when including these in your modelling?	MSDC	N/A	It is clear within the UK Government's Jet Zero Strategy that innovation is required within the aviation sector to ensure that alternative fuel aircraft, and zero-emission aircraft, can deliver some of the emissions reductions required to achieve net zero for the sector. However, these technologies are still in development and there is insufficient clarity on the supporting infrastructure needs at this time. The Carbon Action Plan records the best practice that GAL is already committed to, to keep a close watching brief on industry innovation and to continue to invest ahead of requirements to ensure that Gatwick is always 'Jet Zero ready'.	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.52	Aviation modelling	What assumption for demand management will GAL make in their aviation modelling?	MSDC	N/A	The net zero target for aviation (including emissions associated with the operation of airports) are addressed at a sector/national level via the UK Government's Jet Zero Strategy. This strategy established the commitments and mechanisms whereby the UK Government will monitor and ensure progress – at national scale – towards a net-	Planning Statement, Chapter 3 [APP-245] Needs Case, Chapter 3 [APP-250]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					zero compliant trajectory for the sector. The strategy, necessarily, takes a sector-wide approach so as to allow flexibility within the planning and delivery of capacity across UK airports. Government policy confirms that aviation demand can be met consistent with commitments to Jet Zero, and that there is no need for demand management.		
14.53	Surface access emissions	How does GAL plan to monitor emissions from surface access journeys in the future?	MSDC	N/A	GAL's commitments in relation to surface access emissions and their respective review, monitoring and governance processes are set out in the DCO Surface Access Commitments.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
14.54	Surface access emissions	What plans does GAL have in place if emissions from surface access journeys are exceeded?	MSDC	N/A	GAL's commitments in relation to surface access emissions and their respective review, monitoring and governance processes are set out in the DCO Surface Access Commitments.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	
14.55	GHG emissions forecasts	How is active travel being built into the transport GHG emissions forecasts?	MSDC	N/A	The projected emissions for surface access accessing the airport is set out in paragraphs 16.9.47 to 16.9.52 of ES Chapter 16, supported by ES Appendix 16.9.3 containing the surface access greenhouse gas assessment technical appendix.	ES Chapter 16: Greenhouse Gases [APP-041] ES Appendix 16.9.3: Assessment of Surface Access Greenhouse Gas Emissions [APP-193]	
14.56	Sensitivity testing	Will any sensitivity testing be undertaken to model different levels of uptake of low and zero emissions vehicles.	MSDC	N/A	The modelling carried out for the Environmental Statement considers future uptake of low and zero emissions vehicles that align with the UK Transport Decarbonisation Plan. Sensitivity modelling has not been undertaken to consider alternative uptake trajectories.	ES Chapter 12: Traffic and Transport [APP-037] ES Chapter 16: Greenhouse Gases [APP-041]	
14.57	Electric vehicle charging	What provision is GAL making for electric vehicle charging?	MSDC	N/A	Response provided under Item 14.23.	N/A	
14.58	Low and zero emissions vehicles	Will any sensitivity testing be undertaken to model different levels of uptake of low and zero emissions vehicles.	MSDC	N/A	Response provided under Item 14.56.	N/A	
14.59	SAFs	What is being assumed around the use of SAFs? Could there be a premium on cost from using SAFs?	MSDC	N/A	The modelling of emissions from aircraft follow the assumptions for low/zero emission aircraft contained within the Jet Zero High Ambition scenario. This includes expected uptake of SAF (see the response to 14.5).	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Gatwick Airport is already capable of supporting SAF adoption and demonstrated this in November 2021, when almost 50 easyJet flights from the airport were powered by SAF. SAF was blended with Jet A-1 fuel at a depot upstream of Gatwick to create a drop-in fuel compatible with existing aircraft engines and the airport infrastructure, without requiring additional investment. The fuel was then delivered to the main storage fuel storage tanks located to the NE of the airport and was then supplied to the aircraft via the airport's hydrant system.		
14.60	Surface access	Why is the assessment over surface access considered to be limited? There is an argument that the airport has more control over surface access than say aviation.	MSDC	N/A	Further clarification is requested on the issue raised.	N/A	
14.61	Climate change resilience assessment	Can GAL confirm how they identified the assets to be assessed as part of the climate change resilience assessment?	MSDC	N/A	<p>The way in which assets were identified was presented at the Topic Working Group meeting with the Local Authorities on 7th November 2022. A response to this question was also provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The assets were identified using professional judgement and a climate risk assessment tool which contained key climate risks for airport assets. These were identified based on a review of past assessments and EIAs. Additional assets were added based on discussions with design teams (e.g. CARE facility) and a review of the Project Description (ES Chapter 5).</p>	ES Chapter 15: Climate Change [APP-040]	
14.62	Climate change resilience assessment	What design life is being considered for the assets to be included in the assessment? Will different design lives be considered for different assets?	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The maximum design scenarios that have been considered in the assessment are presented in Table 15.7.1 of the ES Chapter 15 on Climate Change. For the receptors identified by the topic chapters in the Environmental Statement and all asset groups identified in the Project Description, the climate</p>	ES Chapter 15: Climate Change [APP-040]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					change projections for the 2050-2079 ("2060s") Future Climate Scenario have been used to present climate changes up to a future Design Year of 2080. Further explanation is contained in the ES Chapter.		
14.63	Climate change resilience assessment	To what extent have GAL considered existing assets as part of their assessment?	MSDC	N/A	<p>The way in which existing assets have been considered was also presented at the Topic Working Group meeting with the Local Authorities on 7th November 2022. A response to this question was also provided at the Topic Working Group meeting on 18th January 2023.</p> <p>All existing assets that are not being modified as part of the Project are assumed to be maintained in line with Gatwick Airport's existing and therefore are not assessed in the Environmental Statement. The ES Chapter on Climate Change reports on the assessment of future impacts for modified assets and new assets constructed as part of the Project only.</p>	ES Chapter 15: Climate Change [APP-040]	
14.64	Climate change resilience assessment	Can GAL confirm where they sourced the criteria to assess the 'consequence' of climate change impacts?	MSDC	N/A	<p>The approach to the climate change resilience assessment was presented at the Topic Working Group meeting with the Local Authorities on 7th November 2022. A response to this question was also provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The criteria used to assess the consequence of a climate change impact is set out in Table 15.8.2 of ES Chapter 15. The criteria was developed using in-house expertise based on past climate change risk assessments that were undertaken and available guidance.</p>	ES Chapter 15: Climate Change [APP-040]	
14.65	Climate change resilience assessment	Does the consequence criteria align with GAL's approach to assessing the consequence of climate impacts (Climate Change Adaptation Progress Report, GAL, 2021)?	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>Gatwick Airport's Climate Change Adaptation Progress Report has been considered within the assessment process, as set out in Section 15.4 of ES Chapter 15. Whilst the definitions of 'consequence' levels are not included within the GAL 2021 report, the risk matrix matches the one used within the ES Chapter.</p>	ES Chapter 15: Climate Change [APP-040]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.66	Climate change resilience assessment	Only the environmental impacts of climate change have been considered as part of the assessment. Should the social and economic impacts of climate change also be considered as part of the assessment?	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>As explained, only the physical impacts of climate change on the Project's new assets (which includes infrastructure assets, staff and passengers) are assessed. The broader indirect impacts from climate change on the country/globe are out of scope for the EIA climate change resilience process. Vector disease changes are included in the Health and Well-being ICCI assessment where it affects staff and passengers.</p>	ES Appendix 15.9.1: In-Combination Climate Change Impacts Assessment [APP-188]	
14.67	Sensitivity testing	Will any sensitivity testing be undertaken on the impacts of increased heat on the efficiency of aviation? When temperatures rise aircraft require more fuel to operate, particularly to take off.?	MSDC	N/A	<p>The effects of temperature on the performance of aircraft / aircraft engines was presented at the Topic Working Group meeting with Local Authorities on 7th November 2022.</p> <p>This is considered within the in-combination climate change impacts assessment contained in ES Appendix 15.9.1. It sets out that an increase in temperature would have an insignificant increase on aircraft performance.</p>	ES Appendix 15.9.1: In-Combination Climate Change Assessment [APP-188]	
14.68	Urban heat island	How has the choice of sites been arrived at for the Urban Heat Island Effect assessment?	MSDC	N/A	<p>The approach to the Urban Heat Island assessment was presented at the Topic Working Group meeting with Local Authorities on 7th November 2022.</p> <p>The locations used in the assessment, based on the available weather stations, is explained in Section 2 of the UHI assessment contained in ES Appendix 15.5.2.</p>	ES Appendix 15.5.2: Urban Heat Island Assessment [APP-186]	
14.69	Past temperature data	The slide presented shows past temperature data for Crawley is to be confirmed. How will this be confirmed for the Environmental Statement?	MSDC	N/A	The assessment compared temperatures between an urban city location, a rural location and Gatwick. This is set out in Section 15.5 of ES Chapter 15.	ES Chapter 15: Climate Change [APP-040]	
14.70	Future baseline	When considering the future baseline is a 1 in 100 year event of 38 degrees C too low? We are seeing this being regularly exceeded in recent years. It is stated that Europe is heating at twice the rate of the rest of the world.	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The assessment uses the latest UK Climate Projections (not forecasts or predictions) using the worst case Representative Concentration</p>	ES Chapter 15: Climate Change [APP-040]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					Pathway 8.5 (as per the IEMA 2020). It is not possible to give a precise prediction of how weather and climate will change into the future so UKCP18 provides ranges that aim to capture a spread of climate response based on current knowledge, and using a particular set of methodologies developed by the Met Office and collaborators.		
14.71	Extreme weather	Extreme weather events will impact procurement/supply chains, staff availability and potential security. How will this be taken into account as part of the assessment?	MSDC	N/A	The potential effects of extreme weather/climatic events throughout the construction and operation of the Project is considered within the climate change assessment contained in ES Chapter 15.	ES Chapter 15: Climate Change [APP-040]	
14.72	CCR	Physical assets are to be assessed for CCR. Will necessary processes also be assessed, eg ability of staff and passengers to access the site if there is disruption of any type?	MSDC	N/A	A response to this question was provided at the Topic Working Group meeting on 18 th January 2023. The physical impacts of climate change on the Project's new assets (which includes infrastructure assets, staff and passengers) are the primary focus of the climate change assessment. The broader indirect impacts from climate change on the airport processes are considered, where appropriate, in the CCR and ICCI assessments.	ES Appendix 15.8.1: Climate Change Resilience Assessment [APP-187] ES Appendix 15.9.1: In-Combination Climate Change Impacts Assessment [APP-188]	
14.73	Social and health impacts	Will social and health impacts of a climate stressed planet affecting operations be assessed?	MSDC	N/A	A response to this question was provided at the Topic Working Group meeting on 18 th January 2023. As explained, only the physical impacts of climate change on the Project's new assets (which includes infrastructure assets, staff and passengers) are assessed. The broader indirect impacts from climate change on the country/globe are out of scope for the EIA climate change resilience process. Vector disease changes are included in the Health and Well-being ICCI assessment where it affects staff and passengers.	ES Appendix 15.9.1: In-Combination Climate Change Impacts Assessment [APP-188]	
14.74	Representative Concentration Pathway	What will be done to provide a more realistic forecasts, especially in view of use of Representative Concentration Pathway 8.5 which assumes minimal reduction in global emissions,	MSDC	N/A	The assessment used UKCP18 projections (Met Office, 2018a) (which have superseded the UKCP09 projections) using Representative Concentration Pathway (RCP) 8.5 emissions scenario ('high') across the range of probability	ES Chapter 15: Climate Change [APP-040], Section 15.5	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		approaching 5 Celsius increase and an unliveable planet by the end of the century?			levels from the 10th to the 90th percentile. This is in line with the Airport National Policy Statement, which requires the high emissions scenario to be used.		
14.75	Scenario date	Is 2060 the only scenario date? Should a midway assessment be provided at, say, 2040?	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The 2060s cover the future 30-year time period of 2050-2079. For construction phase the 2030s (covering the 30-year period of 2020-2049) is used, covering the construction phase and 2040.</p>	ES Chapter 15: Climate Change [APP-040], Section 15.4	
14.76	Non-Kyoto emissions assessments	The PEIR says that the ES will keep non-Kyoto emissions assessments under review. What is the current state of this review? This should consider that nitrogen oxides have powerful radiative forcing effect over the initial 20 year period – which is of most concern – even if a later period mitigation effect may come into play.	MSDC	N/A	<p>A response to this question was provided at the Topic Working Group meeting on 18th January 2023.</p> <p>The assessment includes consideration of the GHG included within the Kyoto-basket of gases. Non-CO2 impacts are discussed within the Environmental Statement, however these are not quantified within the wider assessment for the reasons set out in the Environmental Statement.</p>	ES Chapter 16: Greenhouse Gases [APP-041], paragraphs 16.4.12 to 16.4.14.	
14.77	Net zero	It would be good to understand how far the CAP goes to meeting net zero operations by 2040.	MSDC	N/A	GAL has committed to achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040 as part of its Carbon Action Plan. This is in line with the UK Government's stated ambition in the Jet Zero Strategy "for all airport operations in England to be zero emissions by 2040". GAL has set out within the Carbon Action Plan what emissions fall within the scope of its commitment, but has further committed to updating this commitment when the policy for and definition of 'airport operations' is finalised and published by the UK Government.	Section 4.2 of ES Appendix 5.4.2: Carbon Action Plan [APP-091]	
14.78	Transportation of freight emissions	Have has the transportation of freight been considered? Only passenger and staff emissions were mentioned under surface access.	MSDC	N/A	Response provided under Item 14.28.	N/A	
14.79	Electric / hydrogen aircraft	What measures are GAL putting into place to future proof the airport for electric/hydrogen aircraft?	MSDC	N/A	It is clear within the UK Government's Jet Zero Strategy that innovation is required within the aviation sector to ensure that alternative fuel aircraft, and zero-emission aircraft, can deliver	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					some of the emissions reductions required to achieve net zero for the sector. However, these technologies are still in development and there is insufficient clarity on the supporting infrastructure needs at this time. The Carbon Action Plan records the best practice that GAL is already committed to, to keep a close watching brief on industry innovation and to continue to invest ahead of requirements to ensure that Gatwick is always 'Jet Zero ready'.		
14.80	Decarbonisation	What is GAL doing to decarbonise the existing building stock?	MSDC	N/A	A Carbon Action Plan (CAP) has been submitted as part of the DCO application which sets out binding commitments in relation to carbon. The CAP focusses on three key airport emission sources including airport buildings and ground operations. The CAP sets clear outcomes that GAL is committing to deliver. To achieve those outcomes, we will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve.	ES Appendix 5.4.2 Carbon Action Plan [APP-091]	
14.81	Offsetting surface access journeys	Other airports are considering offsetting surface access journeys. Why is GAL not considering this?	MSDC	N/A	GAL has not proposed a commitment to offset surface access emissions, and such a commitment is not required by national policy.	N/A	
14.82	IEMA guidance	What IEMA guidance is used for the assessment.	MSDC	N/A	The assessment is based on the updated IEMA guidance published in 2022. This is set out in Section 16.4 of the ES Chapter on Greenhouse Gases.	ES Chapter 16: Greenhouse Gases [APP-041]	
14.83	Climate change	Is GAL looking at the combined impacts of climate change and other impacts for example will the combined impact of climate change with airport quality impacts from aircraft require preconditioned air in the new Pier 7?	MSDC	N/A	Each environmental topic has considered potential changes to the assessment as a result of climate change. ES Chapter 20 contains the assessment of cumulative effects and inter-relationships between the environmental topic-based assessment.	ES Chapters 1 to 21 [APP-026 to APP-046]	
14.84	London Overheating Hierarchy Guidance	Will the London Overheating Hierarchy Guidance or other guidance be used as part of the assessment? Are measures such as the use of louvres on the outside of buildings being considered? This is a key issue to limit need for mechanical ventilation and reduce energy use.	MSDC	N/A	The legislation, policy and guidance that has informed the climate change assessment is set out in Sections 15.2 and 15.4 of the ES Chapter 15.	ES Chapter 15: Climate Change [APP-040]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
14.85	Climate change resilience assessment	Surprised that only 2 significant risks have been identified as part of this assessment. Would have thought that increases in temperatures would have an impact on both construction workers and airport operatives. As a 24 hour business the airport does not have flexibility to work around the weather.	MSDC	N/A	The Climate Change Resilience Assessment is contained in Appendix 15.8.1 of the ES. The methodology and criteria underpinning the assessment is explained in Section 15.8 of ES Chapter 15.	ES Appendix 15.8.1: Climate Change Resilience Assessment [APP-187] ES Chapter 15: Climate Change [APP-040]	
14.86	Climate Adaptation Strategy	Will a draft version of the Climate Adaption Strategy be shared with the group for comment?	MSDC	N/A	The draft Climate Change Adaptation Strategy was subsequently superseded by mitigation included in the Code of Construction Practice and the design principles within the Design and Access Statement, submitted as part of the DCO Application.	Design and Access Statement [APP-256], paragraph 6.6.5 and Appendix 1 – Design Principles. ES Appendix 5.3.2: Code of Construction Practice [APP-082]	

Table 15: Cumulative Impacts

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
15.1	Noise receptors	That GAL be required to submit additional information characterising the impact in both short, medium and long term on receptors for all noise expressed cumulatively within the Environmental Statement.	CBC	N/A	Paras 14.11.1 to 14.11.6 of ES Chapter 14 assess the combined effects of the different types of noise throughout the lifetime of the Project. Para 14.11.2 note as there is no reliable means of quantitatively assessing the overall noise effect resulting from different noise sources, this section considers the overall effect of noise from combined sources qualitatively. The section concludes that combined effects are likely to be minor, and for the combination of ground and air noise, if necessary monitoring would identify the need for noise insulation to mitigate an in combination impact.	Paras 14.11.1 to 14.11.6 of ES Chapter 14: Noise and Vibration [APP-039]	
15.2	Health and wellbeing impacts of Heathrow and Gatwick expansion	That the health and wellbeing impacts of both Heathrow and Gatwick airport expansion projects are considered by GAL in full through the Environmental Statement, with appropriate mitigation provided as required.	CBC	N/A	The approach to the consideration of cumulative effects with NRP together with Heathrow Third Runway is described in section 20.7.2 to 20.7.6 of Chapter 20 of the ES. Table 20.7.2 provides the cumulative effects assessment undertaken, that includes Health and Wellbeing.	Section 20.7.2 to 20.7.6 (including Table 20.7.2) of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045]	
15.3	Cumulative Effects Assessment	CBC notes the approach that GAL has taken to the assessment of development sites in the Cumulative Effects Assessment in relation to the transport assessments and the classification of the West of Ifield site as 'Reasonably Foreseeable' which means that the site is not included in the core scenario transport modelling. Conversely, GAL has stated that the NRP will have no effect on increasing the number of homes which are required to be built in the Gatwick labour catchment area above those already planned by Local Authorities, and GAL has referenced the West of Ifield site previously as a practical example in the Gatwick labour catchment area that may serve the NRP. CBC considers the approach that GAL is taking to be inconsistent and insufficient as the inputs and approach to assessments are not being	CBC	N/A	West of Ifield was identified in the long list and was also short listed for the cumulative effects assessment (as shown in Appendix 20.4.1 Short and Long List of other Developments), in accordance with the methodology set out in section 20.4 of Chapter 20: Cumulative Effects and Inter-relationships and therefore has been considered in the cumulative effects assessment in the ES. The approach to transport modelling is based on Department of Transport (DfT) Transport Analysis Guidance (TAG) Unit M4. However, based on stakeholder comments, West of Ifield has been modelled separately together with Horley Business Park and Gatwick Green. The assessment is contained in section 12.11 of Chapter 12 of the ES, as well as in full detail in Annex B of the Transport Assessment (Strategic Modelling Report).	Section 20.4 of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045] ES Appendix 20.4.1: Short and Long List of other Developments [APP-216] Section 12.11 of ES Chapter 12: Traffic and Transport [APP-037] Chapter 14 of Transport Assessment, Annex B - Strategic Transport Modelling Report [APP-260]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		consistently applied across the topic areas.					
15.4	Land West of Kilnwood Vale	CBC recommends that Land West of Kilnwood Vale is included in the CEA, given that it meets the sift criteria in terms of proximity to the Airport and the quantum of development. However, in its response on Slide 28 GAL suggests that the site does not yet feature as an allocation in the draft Local Plan so does not meet the criteria for assessment at this stage.	CBC	N/A	Land West of Kilnwood does not meet the search criteria for 'long list developments', i.e. it is not an NSIP, TWAO, major application submitted to the LPA, or Local Plan allocation within 10km of the proposed development. It also does not qualify as 'other developments' for inclusion in the CEA as it is not Tier 1, 2 or 3 development. This is the reason the site was screened out of the CEA assessment. GAL screened for CEA development periodically during the pre-application stage; in September 2022, January 2023 and May 2023 so that the CEA assessment is up to date prior to submission of the DCO. GAL notes that the Horsham District Council's draft Regulation 19 Local Plan was withdrawn on 10th January 2023 and the local plan process has paused following the local elections in May 2023 and the election of a new administration.	Section 20.4 of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045]	
15.5	Cumulative Effects Assessment	Confusion, lack of transparency and lack of consistency in the way sites have been assessed in the long- and short-list for the CEA, and then how these have been included in the assessments on topics themselves i.e. West of Ifield is not included in the Core Transport Modelling Scenario but is being relied upon as a location in the labour catchment area to serve the development.	HDC	N/A	<p>The methodology used for the assessment of cumulative effects is set out in section 20.4 of Chapter 20: Cumulative Effects and Inter-relationships of the ES. West of Ifield was identified in the long list and was also short listed (as shown in Appendix 20.4.1 Short and Long List of other Developments) and therefore has been considered in the cumulative effects assessment in the ES.</p> <p>The approach to transport modelling is based on Department of Transport (DfT) Transport Analysis Guidance (TAG) Unit M4. However, based on stakeholder comments, West of Ifield has been modelled separately together with Horley Business Park and Gatwick Green. The assessment is contained in section 12.11 of Chapter 12 of the ES, as well as in full detail in Annex B of the Transport Assessment (Strategic Modelling Report).</p>	<p>ES Appendix 20.4.1: Short and Long List of other Developments [APP-216]</p> <p>Section 20.4 of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045]</p> <p>Section 12.11 of ES Chapter 12: Traffic and Transport [APP-037]</p> <p>Chapter 14 of Transport Assessment, Annex B - Strategic Transport Modelling Report [APP-260]</p>	
15.6	Land West of Kilnwood Vale	Land West of Kilnwood Vale is included in the CEA, given that it meets the sift criteria in terms of proximity to the Airport and the quantum of	HDC	N/A	Land West of Kilnwood does not meet the search criteria for 'long list developments', i.e. it is not an NSIP, TWAO, major application submitted to the LPA, or Local Plan allocation within 10km of the	Section 20.4 of ES Chapter 20: Cumulative Effects	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		development. However, in its response on Slide 28 GAL suggests that the site does not yet feature as an allocation in the draft Local Plan so does not meet the criteria for assessment at this stage. Conversely, Land West of Ifield is included and the draft Horsham Local Plan (Regulation 18 version, February 2020 – Strategic Site Option 5) is referenced. GAL should note that these sites were originally included together and referred to as “Land West of Crawley” in the Regulation 18 at the time (not to be confused with the Homes England broader strategic opportunity area). For the Regulation 18, Land West of Kilnwood Vale was originally identified as being able to deliver 800 dwellings but this has now been reduced to 350 dwellings in the draft Local Plan published for Cabinet in July 2021. As GAL will be aware the Regulation 19 did not progress to full Council. The Council remains of the view that Land West of Kilnwood Vale should be included in the CEA along with Land West of Ifield.			<p>proposed development. It also does not qualify as ‘other developments’ for inclusion in the CEA as it is not Tier 1, 2 or 3 development. This is the reason the site was screened out of the CEA assessment. GAL screened for CEA development periodically during the pre-application stage; in September 2022, January 2023 and May 2023 so that the CEA assessment is up to date prior to submission of the DCO. GAL notes that the Horsham District Council’s draft Regulation 19 Local Plan was withdrawn on 10th January 2023 and the local plan process has paused following the local elections in May 2023 and the election of a new administration.</p> <p>Land West of Ifield was included as a Tier 2 site (see ref. 353 on Page 27 of Appendix 20.4.1: Cumulative Effects Assessment Long and Short List for GAL’s reasoning).</p>	<p>and Inter-relationships [APP-045]</p> <p>ES Appendix 20.4.1: Short and Long List of other Developments [APP-216]</p>	
15.7	Cumulative Effects Assessment	Continuing lack of clarity as to how the strategic site allocation Land North of Horsham has been treated by GAL in the CEA (this is a site which has outline planning permission plus a number of reserved matters). It is very important that this site is included in the CEA given the potential for in-combination effects of this site, together with the Kilnwood Vale development site plus the Land West of Ifield and the NRP, should they proceed. There is specific concern in relation to the highway network and the impacts on the A264 and adjoining roads within Horsham and Crawley. It should also be noted that the site promoters for Land North of Horsham have proposed that the density of the	HDC	N/A	<p>Land West of Kilnwood Vale was screened out for those reasons given at 15.4 and 15.6 within this table.</p> <p>Land north of Horsham is on the long list and was also short listed (as shown in Appendix 20.4.1 Short and Long List of other Developments) and therefore has been considered in the cumulative effects assessment in the ES.</p> <p>The densification of the site (an uplift from 2,750 as consented to 3,250 dwellings) has been screened out of the long list as this site allocation was proposed in the draft Regulation 19 Local Plan that was withdrawn on 10th January 2023. GAL notes that the Horsham District Council’s draft Regulation 19 Local Plan was withdrawn on 10th January 2023 and the local plan process has paused following the</p>	<p>Section 20.4 of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045]</p> <p>ES Appendix 20.4.1: Short and Long List of other Developments [APP-216]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		site (within the consented red line boundary) could be uplifted by a further 500 dwellings and this was identified in the Council's Cabinet papers for consideration of the draft Regulation 19 Local Plan which was subsequently withdrawn prior to full Council. This uplift would thereby increase the scale of the development and the potential for adverse cumulative effects – can GAL please confirm that Land North of Horsham will be assessed based on 3,250 dwellings (the consented 2,750 plus the densification of 500 dwellings proposed in the emerging Local Plan)?			local elections in May 2023 and the election of a new administration. As such, the Land North of Horsham proposed site allocation for 3,250 dwellings does not meet the sifting criteria.		
15.8	Cumulative Effects Assessment	Cumulative effects of the project and other developments on the foul water network and potable water supply, especially given rezoning water supply areas is a possibility being considered to address the water neutrality issue.	HDC	N/A	Gatwick's water is supplied by Sutton and East Surrey Water which is outside the Sussex North Water Resource Zone that is subject to water neutrality restrictions. The proposals would be reviewed should the rezoning of water supply areas progress.		
15.9	FASI-S	FASI-S is a project that will have a bearing on the implementation of the DCO. The option and available data should be more readily considered in scenario testing. Draft options are due to be publicly consulted on before hearing sessions commence and implementation of FASI is due in 2027. These two projects cannot be disaggregated.	MVDC	N/A	<p>Although the proposed FASI-S airspace changes lie outside of the scope of this Project, should information on the outcome of Gatwick's FASI-S project become available at a time when the information can be taken into account during the examination of the DCO application, the implications of this, in terms of the environmental effects such as those associated with noise and other emissions, will be reviewed and considered. Although the lateral tracks of the arrival and departure route structure around Gatwick will take some time to be determined through the airspace change process, improvements in the vertical design of routes can be expected to deliver both carbon and noise reduction benefits.</p> <p>Further details of FASI South and the approach are set out in Section 6.2.15 onwards of ES Chapter 6: Approach to Environmental Assessment [APP-031].</p>	Section 6.2.15 onwards of ES Chapter 6: Approach to Environmental Assessment [APP-031]	
15.10	Climate change impacts from parking	Tracker does not appear to have included a climate change section to reflect comments made, amongst others, on climate change impacts from	TDC	N/A	The trackers have been reproduced into tables to incorporate comments received following acceptance of the application. This includes a table	N/A	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		traffic and transport regarding levels of parking.			that sets out and responds to issues raised in relation to climate change.		
15.11	Climate Change and Emissions Plan	Tracker does not appear to have picked up or addressed comments made on there being no draft of the Climate Change and Emissions Plan, as also noted by other authorities.	TDC	N/A	The trackers have been reproduced into tables to incorporate comments received following acceptance of the application. This includes a table that sets out and responds to issues raised in relation to climate change. The Carbon Action Plan (CAP) is available as part of the DCO Application. GAL welcomes any comments that TDC has on the CAP.	ES Appendix 5.4.1 Carbon Action Plan [APP-091]	
15.12	Carbon values	Disappointing that the carbon values used in the economic impact assessment have not yet been updated to reflect latest carbon values issued by BEIS.	SCC	N/A	<p>The appraisal values used in the analysis were provided by the former Department for Business, Energy & Industrial Strategy, and are sourced from Department for Transport (2022), 'TAG Data Book, A3.4 Greenhouse Gases', May. These values have been updated from those employed in the PEIR analysis (July 2021).</p> <p>In a previous response, it was acknowledged that in September 2021, BEIS updated the relevant carbon cost values used in the appraisal of GHG emissions. In November 2021, the DfT published an updated version of DfT's model, which included the updated September 2021 BEIS carbon values. This update to DfT's model occurred after the release of the PEIR. While the carbon values employed in the PEIR were up-to-date as of the date of publication of that report, the subsequent update to these values was acknowledged and factored in when planning updates for the ES.</p>	N/A	

Table 16: Forecasting

Reference	Subject	Issues Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
16.1	Aviation Capacity and Forecasting	Explanation as to the basis upon which the specific projections of usage of the airport in terms of aircraft movements, type of aircraft, time of day and passenger characteristics, with and without the North Runway, were prepared. The top down benchmarking is not sufficient to verify that reasonable assumptions have been used. The specific implications of assumptions about capacity being brought forward at other London airports is not transparently set out;	JLAs	These issues have been extensively discussed through the Technical Working Group meetings. ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Detailed information and forecasts are provided on all issues raised by the authorities. The FDB sets out the approach and methodology to the Project forecasts (Section 5.5); explains the assumptions that have been made regarding the capacity of other London Airports (Section 7.3); and the time periods (Section A1.2); and analysis of passengers. The authorities may not agree but the issues raised have been noted and addressed. They continue to be discussed through the SoCG process.	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.2	Bottom-up inputs	<p>Not agreed</p> <p>The adoption of a bottom up approach to the preparation of the overall demand forecasts over the period to 2047 is not considered robust. Bottom up forecasts are normally only considered reliable over a 5-10 year period. In any event, the use of busy day schedules as the basis of deriving an overall annual forecast relies on the assessment of capacity deliverable with the NRP, which is also not accepted (see above/below).</p> <p>In the absence of properly calibrated 'top down' modelling of how demand would be accommodated across the London airports, it is not possible to determine:</p> <p>a) the share of the market that Gatwick might attract; and</p> <p>b) the implications of additional capacity being delivered at other airports, in particular Heathrow</p> <p>The demand forecasts are not considered robust</p>	JLAs	<ul style="list-style-type: none"> - At a constrained airport, bottom-up insights including busy day schedules, airlines, markets, aircraft types etc. are necessary to support assumptions around potential throughput. - A bottom-up view (i.e. airlines/markets) enables GAL to provide context on how the scarce resource of runway capacity can be utilised. - Slot allocation takes into account a wide range of factors that cannot be captured by a top down model (e.g. new entrant vs incumbent status, balance of markets, development of network, competition, season length, traveler regulations and potential other 'local' airport rules). - In a constrained market, bottom-up forecasts will be more accurate and appropriate than top-down forecasts in forecasting how an airport would respond to increased capacity. 	A top-down forecast is used to support the bottom up forecasts. It provides useful inputs around other airport performance, constraints, demand potential and spill from other airports. The effects of removing constraints at constrained airport requires a bespoke approach. Whilst historical travel patterns can be used to inform the future performance, other factors including the development of airline networks also need to be considered. Both now and through the 2030's, pent up demand from carriers is expected to exceed supply, so that a model which allocates demand to assumed available supply is not appropriate.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		as a basis for assessment of the impacts of the proposal.			<p>the way in which an airport may respond to the release of capacity and that a bottom-up approach is necessary to inform assumptions, for instance, about the likely attraction of long haul airlines.</p> <p>At Gatwick (which is over-subscribed and capacity constrained, compared with Luton) this approach is even more appropriate.</p>	
16.3	Applying bottom-up forecasts	<p>Not agreed.</p> <p>Long term demand forecasts produced on this basis are not robust as it is not supported by a robust analysis of the likelihood of the 'pipeline' demand being delivered by reference to underlying demand in each individual market and taking into account the competition from other airports to attract the specific services. The approach adopted is not robust and not transparent.</p>	JLAs	<p>In these circumstances, it is appropriate to approach forecasting, as follows:</p> <ul style="list-style-type: none"> • A peak day schedule (August Friday) is used to model runway holding times. • A commercial Busy Day pipeline of demand is developed in line with annual growth and market share assumptions, based on the experience gained from intense engagement with airlines and markets. • Pipeline demand is added to the 2019 base schedule to fill available capacity, prioritising year-round and new routes. • Year-on year capacity releases are managed so as to maintain operational performance and optimise the use of available capacity. 	<p>The top down and bottom up approaches are complementary to each other. The top down modelling provides guidance on the levels of overall market demand available at Gatwick or not able to be accommodated at other London airports. When Gatwick NRP opens significant excess demand will be present in the London and SE market and Gatwick will be able to attract this growth from its overlapping catchment. Whilst a top down model can inform the levels of overall demand, bottom up analysis provides the best means of assessing which markets/airlines are best placed to respond to the opportunity at Gatwick.</p> <p>When slot capacity is released there is a complex slot allocation process that needs to be considered, again the bottom up approach is able to capture some of these key considerations.</p>	<p>ES Appendix 4.3.1: Forecast Data Book [APP-075]</p>
16.4	LGW, capacity utilisation today (2019/2023)	<p>It is noted that the number of annual aircraft movements at Gatwick plateaued in the period 2017-2019 at c.285,000 annual aircraft movements. The DCO single runway baseline is cited as 318,000 aircraft movements, a 12% increase in aircraft movements. This would suggest that GAL envisages being able to accommodate growth in demand beyond current levels without the NRP.</p>	JLAs	<p>Correct – the application is clear that some growth can be achieved without the NRP due principally to trends in aircraft size and occupancy but also due to trends in peak spreading. However, that capacity falls well below the scale of need and demand. It also is extremely limited at peak times of demand.</p> <ul style="list-style-type: none"> • In the summer season, LGW operates at capacity during the core hours of the day and in the night period. • Demand significantly exceeds capacity as per slot applications of airlines • Any notable capacity that has become available in recent years has been taken up (e.g. through new slot transactions) and 	N/A	<p>ES Appendix 4.3.1: Forecast Data Book [APP-075]</p>

				<p>trading in slots demonstrates excess demand.</p> <ul style="list-style-type: none"> • Today, GAL is not able to accommodate all the demand from airline customers or new entrants 			
16.5	LGW, capacity utilisation today (2019/2023)	There are proposals to increase capacity at a number of London airports, including London City, London Luton and Stansted (expanded terminal infrastructure). It also remains Government policy under the Airports National Policy Statement that a third runway should be constructed at Heathrow.	JLAs	<p>LHR/LTN are operating at or very close to their planning caps.</p> <p>Apart from STN (which requires some development to support), very limited capacity exists in the LON airport system.</p> <p>There are proposals to increase capacity at a number of London airports, including London City, London Luton and Stansted (expanded terminal infrastructure). It also remains Government policy under the Airports National Policy Statement that a third runway should be constructed at Heathrow.</p>	<p>LGW will be able to deliver capacity many years ahead of the proposed LTN and LHR schemes providing much needed capacity in the early 2030s.</p> <p>GAL's case in the submitted Forecast Data Book takes direct account of capacity at other airports and contains sensitivity tests for Heathrow R3 and the proposed expansion at Luton. Neither are consented or constructed but, even if they were, there is still a clear need for the expansion of Gatwick in the near and long term.</p>	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.6	LGW Capacity developments by 2030s	<p>The basis for operating more consistent year-round schedules is not agreed as it would require a different mix of traffic than currently projected for LGW.</p> <p>The assumed operational date of 2029 for the NRP was based on a DCO submission in 2022 so the operating date is not agreed.</p>	JLAs	<p>In the absence of NRP LGW will only be able to achieve notable growth through larger/fuller aircraft operating more consistent year-round schedules. Limited growth is offered by runway performance which is already operating at 55 movements per hour)</p> <p>NRP is assumed to become operational in 2029 and GAL remains confident of early operation of the NRP.</p>	<p>The continued growth in non-peak periods reflects recent experience at Gatwick Airport, the changing nature of markets and the absence of peak capacity.</p> <p>In the 2013-19 period, Gatwick's peak month ratio (compared to average month) has declined by >20%, demonstrating a de-peak of activity and a spread in year-round growth.</p>	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.8	Capacity developments by 2030s Approach to other capacity	Not agreed. Consideration of the effect on demand for LGW of other airport capacity enhancements coming forward at the London airports, and beyond e.g. HS2 access to Birmingham and Manchester Airports, should be transparently considered. It is not reasonable to assume that none of these other developments will be realised.	JLAs	In principle, it is not appropriate to assume that other planned airport capacity will come forward elsewhere.	<p>This issue is addressed in the application – for example in the Need Case where the equivalent statements from the SoS in his most recent aviation decision are recorded (at Manston). Assuming other developments will come forward where they have not been consented (or even proposed) and where investment decisions have not been made is not appropriate and risks critical UK aviation demand not being met.</p> <p>Gatwick's core catchment will see limited impact from HS2, less than 5% of LGW's passengers originate in regions outside of London, the South West/East and East England.</p>	Needs Case [APP-250]	

16.9	Capacity developments by 2030s Other LON	The likely timing of additional capacity being provided at the London airports is accepted. Assumptions regarding greater use of regional airports by regional demand that currently uses the London airports need also to be clearly stated.	JLAs	Without prejudice to the above, if assumptions are to be made: <ul style="list-style-type: none"> At its earliest, LHR R3 is not likely to be operational before mid to late 2030s (It is appropriate that R3 is not assumed in LGW's core forecasts) LTN is only able to achieve modest growth before the introduction of new terminal facilities, estimated in their DCO application as 2037, nearly a decade after LGW's NRP Potential for limited growth at LCY whilst STN's granted planning cap of 43mppa is assumed to continue. 	Incremental growth at remote regional airports is very unlikely to have any impact on need and demand at Gatwick.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.10	Capacity LGW Drivers Aircraft size	Agreed as a general principle but the precise fleet mix is subject to uncertainties relating to the overarching demand forecasts (see above).	JLAs	Average aircraft sizes continue to increase	N/A	N/A	
16.11	Capacity LGW Drivers Load Factor	Agreed as a general principle but there is a commercial ceiling to such growth.	JLAs	The average rate of seat occupancy is continuing to increase but at a much-reduced rate compared to that achieved leading up to 2019	The submitted assessment is directly based on realistic market forecasts.	N/A	
16.12	Capacity LGW Drivers Peak Spreading	There is limited evidence that LGW has seen substantial seasonal de-peaking. The trends claimed in the demand forecast (PEIR Appendix 4.3.1) are not agreed.	JLAs	LGW will become less seasonal. Gatwick's de-peaking trends will continue.	See response to issue at Row 16.6.	N/A	
16.13	Demand COVID Recovery	It is noted that demand recovery at LGW has been slower than elsewhere in the UK. The recovery of the market by 2024/5 is agreed but not necessarily LGW's share of the market.	JLAs	It is appropriate to assume a return to 2019 levels by 2025. Recovery has been rapid but partly restricted due to airline inability to deploy capacity.	N/A	N/A	
16.14	Demand Demand Growth	It is agreed that the JZ demand forecasts at the overall UK level remain similar to those adopted by DfT in 2017. However, more recent demand forecasts accompanying the SAF Mandate consultation https://www.gov.uk/government/consultations/pathway-to-net-zero-aviation-developing-the-uk-sustainable-aviation-fuel-mandate .	JLAs	Growth in demand for aviation is set to continue in the long term, albeit with lower growth rates than demonstrated in the last 20 years The JZ forecasts from 2022 aligned with GAL's top down projections prepared in 2020. This equates to approx. +70% growth from 2018 and provides an appropriate macro forecast for the sector.	The forecasts published with the SAF update are directly referenced in the Forecast Data Book. Over the long term whilst the JZ forecasts have been reduced they still forecast a lack of capacity across the London airports.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.15	Demand LON Growth	This is not correct if Heathrow does not expand a large proportion of the growth in hub traffic assumed within the JZ overall demand forecasts would be lost. It is not agreed that demand to use the London airports will grow by 45 mppa in 2030 absent the increase in runway capacity at	JLAs	The growth under JZ is considered a reasonable basis for London growth rates (for example, catchment population of London is in line with UK, also LON benefits from greater inbound demand potential than elsewhere).	The scale of unconstrained demand is greater still than the capacity constrained forecasts published by DfT with the JZS – on any measure, the current airport system in the SE is under capacity and demand is not being met. There may be differences about	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		Heathrow assumed by the DfT in the JZ scenarios.		By 2030, 25% (JZ'22) growth is forecast across the London airports (in line with JZ UK projection versus a 2018 baseline). This is equivalent to an extra 45 mppa (+25%) in 2030.	the scale future growth in different scenarios but a continuing level of growth is not disputed and neither should there be any doubt about the fact that more capacity is urgently needed / overdue – or that Gatwick NRP is the only credible proposal to provide it before the mid 2030s.		
16.16	Demand vs Capacity LON	These overall figures for the London market are not agreed without detailed assessment of the extent to which these demand levels would arise without the specific capacity assumptions adopted by the DfT in the Jet Zero modelling. Dependent on the consents granted at the other airports in the intervening period, it cannot be assumed that the overall capacity available across the London airports will necessarily be <215 mppa.	JLAs	With only limited growth prospects available across the London airports, demand will continue to and increasingly exceed total terminal capacity constraints. Even if the London airports are able to fully maximise their planning or terminal capacity, demand would continue to outstrip supply. In 2030 total airport capacity is estimated at <215m passengers. <ul style="list-style-type: none"> • Demand will pass these levels based on JZ projections • By 2035 demand in London will exceed 245m (JZ'22) • Further growth is anticipated beyond that date. 	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.17	Demand vs Capacity LGWs LON Positioning	If this was the case, the market would see Gatwick recovering from the effects of the pandemic faster than the other London airports. This is not the case, with passenger throughput in the 12 months to April 2023 running at 86% of 2019 volumes compared to: <ul style="list-style-type: none"> • Heathrow – 94% • Stansted – 98% • Luton – 90% • Manchester – 91% • Edinburgh – 95% • Bristol – 114% 	JLAs	LGW is favoured by many airlines today (e.g. focus of growth ambitions for many carriers) Gatwick is the only airport after LHR where an established secondary market exists for slots Gatwick has historically been prioritised by airlines for growth over other LON airports Gatwick is the only non LHR airport to serve sizeable, long haul demand.	Early recovery rates from Covid do not reflect a good guide to airport performance due to airline behaviour (e.g. BA consolidated operations at LHR) and slots not being released by airlines unable to use them (e.g. Virgin) Summer 2023 provides a more up to date guide. Gatwick is in line with the wider UK performance with c92% of 2019 volumes operated. Gatwick has also been impacted by capacity reductions during the peak from some key carriers (e.g. easyJet) suppressing these volumes. Other markets are still re-commencing that were restricted for travel (e.g. China).	N/A	
16.18	LGW NRP	Not agreed. This has not been demonstrated by GAL in the absence of robustly grounded forecasts based on a detailed assessment of competitive interactions in the market.	JLAs	LGW will grow into the incremental capacity. A release profile of 3 years has been assumed but, even if it takes slightly longer to fill, the NRP will still fill.	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		Recent growth in passenger volumes has been attained largely through a shift in airlines towards low fare airlines with higher average aircraft load factors. It cannot be related directly to the effect of constraints in the market or otherwise.		<p>The NRP growth (13mppa) is a notable but relatively modest increase in the context of a 200+mppa airport system</p> <p>LGW has delivered strong growth historically, even without new runways. For example, >10mppa growth was delivered in 2013-19 period.</p> <p>Repeating this with a new runway in a more constrained market is not remarkable given the levels of market demand growth forecast, LGW's ability to serve out and inbound demand across a large catchment, and Gatwick's ability to provide capacity of a suitable nature and price for its wide range of users mean that the forecast growth is entirely credible.</p>			
16.19	Demand Forecasts	Although some information is provided on current operations at the Airport and some greater explanation about the characteristics of demand and its profile in the Baseline Case, there is limited explanation provided as to the basis upon which the projections of future demand have been made. Except in relation to fleet mix, there does not appear to be any sensitivity analysis considering different growth trajectories and we strongly suggest that this additional analysis needs to be undertaken.	ESCC	N/A	These matters are also fully set out in the submitted application – particularly in the Needs Case and the Forecast Data Book, which contains sensitivity tests.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
16.20	Forecasting Methodology	Concerns about the consistency of the assumptions used to derive specific outputs for assessment, in particular the assumption of the reduced seasonality of demand, the daily profile of demand relative to the use of the runways and the optimisation of aircraft departure routes. Further detailed explanation is required so that the realism of the forecasts and the assessments deriving from them can be verified.	ESCC	N/A	These topics have been covered during topic working group discussions. The profile of demand has been shared relating to hourly patterns of arrivals/departures with splits by aircraft types. Detail around historical demand spreading patterns and future assumptions have been shared and sensitivities have also been prepared capturing impacts on traffic throughput. Data is provided directly on this point in the submitted Forecast Data Book.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

Table 17: Capacity and Operations

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
17.1	Airfield Capacity	The capacity declaration process relies hourly and 15 minute capacity declarations and hourly/rolling hourly/2 hourly terminal capacities. It is not clear how this relates to the process of assessing busy day levels of demand, which would normally derive from an assessment of overall market demand rather than being the basis of deriving that assessment of demand in the first instance.	JLAs	The approach taken by GAL in determining the Busy Day levels of demand which can be accommodated on the runway in future years is the same as used for annual capacity declaration with the support of the GAL Coordination Committee and is a sound basis for assessing future capability.	The declared capacity provides a hard constraint on the aircraft demand that can be accommodated. As with the annual declaration, the forecast levels of demand outstrip the available capacity. In such circumstances the capacity declaration is best undertaken bottom up by determining what of the pipeline demand can be accommodated within the available capacity, which limits what can be scheduled in the summer peak. The Pipeline demand is commercially driven but is sense checked by ICF to ensure that the overall market demand is still more than sufficient to supply the available capacity. This approach is not only viable but most appropriate in the circumstances.	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.2	Airfield Capacity	The process is noted but the robustness of the outputs is dependent on the assumptions adopted (see below).	JLAs	<p>This approach may be summarised as follows:</p> <ol style="list-style-type: none"> 1. A peak day schedule (August Friday) is used to model runway holding times based on forecasted demand, as detailed in the forecasting section. 2. Performance parameters modelled are reflective of non-disrupted busy periods of operation. 3. Sequencing is optimised so as to maximise throughput while avoiding excessive holding for individual aircraft. 4. Average sustained levels of holding are kept below 10 mins and below 15 minutes in any individual hour. This restricts the amount of pipeline demand which can be added each year. 5. Terminal and apron requirements are determined in order to support the forecasted Busy Day demand. <p>It is important to note that in using peak day demand we can expect other days to experience better levels of service when operating in conditions of good visibility without disruption.</p>	See above.	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]	

17.3	Airfield Capacity	<p>The current hourly declared capacity of the single runway is noted. It is noted that this is achieved principally in hours where there is an even balance of arrivals and departure.</p> <p>It is unclear whether the levels of delay to aircraft remain within acceptable levels in hours when more than 55 movements are scheduled.</p> <p>It is not agreed that GAL's modelling has validated the achievability of 69 or 70 movements per hour with dual runway operations at acceptable levels of delay (see below). Specifically, the peak hourly departure rate of runway movements is not agreed as being achievable.</p>	JLAs	<p>The Busy Hour capacity assumed in the Baseline is unchanged from Gatwick's currently declared 55 movements/hour. This can be delivered in hours when there is an even balance of arrivals and departures or when excess departures are sequenced on alternate SIDs. Gatwick has historically achieved throughputs of 55 or more per hour, which is achieved with average Arrival-Departure-Arrival (ADA) separations of 130secs.</p> <p>The Busy Hour Capacity assumed with dual runway operations (DRO) is 70 movements per hour, although maximum number of movements scheduled in a static hour is 69. The expected maximum capacity is 80 movements per hour with an even balance of medium sized arrivals and departures in an ADA sequence. With medium sized arrivals being handled on the main runway and departures on the northern runway, arrivals are spaced at 90s separation and departures may commence roll as soon as the preceding arrival has touched down, the arrival then vacates the main runway and crosses the northern runway after the departure on the northern runway has passed by. The following arrival can then land on the main runway.</p> <p>This capability is more sensitive to mix than with single runway operations as an imbalance in arrivals and departures will not allow best use of the northern runway and wide body departure aircraft are assumed to still use the main runway, again not making best use of the northern runway. As such a realistically achievable throughput in peak hours is about 70 movements per hour. The departures only capacity and arrivals only capacity is unchanged in dual operations.</p>	<p>The levels of delay experienced are in line with those consulted on with the Coordination Committee in assessing Gatwick's capacity declaration i.e. combined arrivals/departures holding times should not be sustained over 10 minutes although it may peak at up to 15 minutes in an individual hour provided it is able to recover below 10 minutes in the hours following. This capacity profiling meets the needs for airlines by accommodating demand at preferred operating times whilst providing "firebreaks" to recover accumulated holding while also ensuring that delays remain within acceptable limits.</p> <p>Front loading the demand at the start of the day means that capacity is well utilised and any delays experienced in the first wave due to regulation can be accommodated in the subsequent firebreak without building over the day. This makes for greater resilience.</p>	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.4	Airfield Capacity	Not agreed due to uncertainty in the uplift in hourly capacity deliverable, particularly for based overnighing aircraft in the peak morning departure period and also in the assumptions underpinning seasonality of traffic.	JLAs	The Busy Day capacity can generate more than 60k annual ATMs, or 13 mppa in addition to the baseline case.	We are confident of the hourly capacity deliverable and how this services the based traffic demand. This has been explained in the draft SoCG and at TWG meetings. The seasonality of the traffic is addressed in the forecasting section.	A1.4 of ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.5	Airfield Capacity	These results are not agreed as valid due to the underpinning assumption that 60 seconds departure-departure separations will be achievable between all departing aircraft regardless of departure route. This simplifying assumption results in the delays for sequencing of aircraft to achieve this	JLAs	Modelled holding times using AirTOP fast time simulation:	The planning schedule is reflective of our Commercial Teams understanding of latent demand, sanity checked by ICF in terms of market growth aspirations.	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1:	

		<p>average separation being understated meaning that, if properly modelled, the average delays in peak periods would exceed the level of 10 minutes on average at the peak that is normally considered as the maximum acceptable to the airlines.</p> <p>It is not agreed that the modelling demonstrates acceptable levels of airfield performance when the requirements to optimise the sequence of departing aircraft to achieve the claimed runway movement rate are fully taken into account. The achievability of the peak morning departure rate is considered more critical to determining the effective capacity of the Airport overall having regard to the future mix of passenger traffic claimed by GAL with 83% of aircraft movements in 2038 with the NRP expected to be domestic and short haul operations.</p> <p>Reference is made to the 'planned schedule' but no justification is provided as to whether the assumptions underpinning this planned schedule are robust.</p>		<table border="1" data-bbox="1160 191 1771 499"> <thead> <tr> <th rowspan="2">Measure Category</th> <th colspan="4">2029</th> <th colspan="4">2038</th> </tr> <tr> <th>0500 - 0900 UTC</th> <th>1200 - 1600 UTC</th> <th>06:00 - 22:00 UTC</th> <th>24hr</th> <th>0500 - 0900 UTC</th> <th>1200 - 1600 UTC</th> <th>06:00 - 22:00 UTC</th> <th>24hr</th> </tr> </thead> <tbody> <tr> <td>Ave. Departures</td> <td>13.7</td> <td>12.4</td> <td>12.8</td> <td>12.9</td> <td>17.9</td> <td>16.9</td> <td>16.0</td> <td>16.0</td> </tr> <tr> <td>Total taxi time (min)</td> <td>9.8</td> <td>8.8</td> <td>9.0</td> <td>9.0</td> <td>10.8</td> <td>9.4</td> <td>9.4</td> <td>9.4</td> </tr> <tr> <td>Ave. Departure holding (min)</td> <td>1.4</td> <td>1.2</td> <td>1.3</td> <td>1.2</td> <td>2.0</td> <td>1.2</td> <td>1.5</td> <td>1.4</td> </tr> <tr> <td>Taxiway</td> <td>0.5</td> <td>0.4</td> <td>0.5</td> <td>0.5</td> <td>0.6</td> <td>0.5</td> <td>0.6</td> <td>0.6</td> </tr> <tr> <td>Runway</td> <td>4.0</td> <td>2.6</td> <td>3.1</td> <td>3.1</td> <td>8.2</td> <td>7.1</td> <td>6.2</td> <td>6.0</td> </tr> <tr> <td>Ave. Arrival holding (min)</td> <td>0.8</td> <td>0.4</td> <td>0.5</td> <td>0.5</td> <td>1.3</td> <td>0.7</td> <td>0.7</td> <td>0.7</td> </tr> <tr> <td>Airbourne</td> <td>3.2</td> <td>3.0</td> <td>3.2</td> <td>3.0</td> <td>4.0</td> <td>3.9</td> <td>3.9</td> <td>3.7</td> </tr> </tbody> </table> <p>The modelling simulates the ground and runway movements from stand to airborne and vice versa. The modelling results demonstrate acceptable levels of airfield performance, as average runway holding times are not sustained above 10 minutes and do not reach over 15 minutes, which are the current agreed parameters for the declaration process. Average departure taxi times, which include runway and taxiway holding, are also below 20 minutes.</p> <p>The fast time simulations abide by 2019 separation performance parameters, although same direction SID DD separation requirements are not considered due to the model not efficiently sequencing both runway selection and SID balancing. This is a reasonable assumption given that the planned schedule has an acceptable balance between arrivals and departures in hours with significant SID directional bias allowing DDs in the same direction to be minimised through optimised sequencing, as with the current operation.</p>	Measure Category	2029				2038				0500 - 0900 UTC	1200 - 1600 UTC	06:00 - 22:00 UTC	24hr	0500 - 0900 UTC	1200 - 1600 UTC	06:00 - 22:00 UTC	24hr	Ave. Departures	13.7	12.4	12.8	12.9	17.9	16.9	16.0	16.0	Total taxi time (min)	9.8	8.8	9.0	9.0	10.8	9.4	9.4	9.4	Ave. Departure holding (min)	1.4	1.2	1.3	1.2	2.0	1.2	1.5	1.4	Taxiway	0.5	0.4	0.5	0.5	0.6	0.5	0.6	0.6	Runway	4.0	2.6	3.1	3.1	8.2	7.1	6.2	6.0	Ave. Arrival holding (min)	0.8	0.4	0.5	0.5	1.3	0.7	0.7	0.7	Airbourne	3.2	3.0	3.2	3.0	4.0	3.9	3.9	3.7		Forecast Data Book [APP-075]	
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Taxiway	0.5	0.4	0.5	0.5	0.6	0.5	0.6	0.6																																																																															
Runway	4.0	2.6	3.1	3.1	8.2	7.1	6.2	6.0																																																																															
Ave. Arrival holding (min)	0.8	0.4	0.5	0.5	1.3	0.7	0.7	0.7																																																																															
Airbourne	3.2	3.0	3.2	3.0	4.0	3.9	3.9	3.7																																																																															
17.6	Airspace change	Noted	JLAs	<p>The project requires a lateral shift of the northern runway centreline by 12 metres. The airspace design to support the operation would be the same as it is today, meaning pilots would fly existing procedures, and the same flight paths over the ground. The dual runway operations would require only minor modifications to the airspace related aspects of the airport's Aeronautical Information Publication (AIP) entry. GAL initiated an airspace change process, overseen by the CAA and in line with CAP1616 requirements. The CAA has reviewed GAL's proposals and categorised the Gatwick Airport Northern Runway Project Airspace Change Proposal as a Level 0 in its decision published as CAP 1908. Level 0 proposals are changes that do not alter air traffic patterns.</p>	N/A	Paragraph 5.2.20 onwards of ES Chapter 5: Project Description [APP-030]																																																																																	

17.7	Airspace capacity	It is noted that NATS currently has measures in place, such as flow control, to ensure that demand from aircraft can be safely managed in the London TMA. Whilst there it is accepted that there is no requirement to alter the departure and arrival routes in the immediate vicinity of the airport to accommodate the NRP, it is understood that the improvements to airspace more generally through the FASI-S program will be required in order to ensure sufficient capacity in the LTMA to accommodate the anticipated growth in aircraft movements at Gatwick and the other London airports.	JLAs	<p>The CAA has already set out in its decision that an airspace change is not necessary to facilitate Gatwick's Northern Runway Project.</p> <p>The airspace around Gatwick, including the current design of the Standard Instrument Departures (SIDs) and the route structure of the London Terminal Manoeuvring Area Airspace (LTMA) is sufficient to accommodate dual runway operations at Gatwick.</p> <p>The Future Airspace Strategy - South (FASI-S) programme may be delivered in a similar timeframe but is not necessary to enable Gatwick's Northern Runway Project.</p> <p>FASI-S is anticipated to deliver network improvements that will directly benefit Gatwick in terms of safety, capacity, efficiency and in reducing environmental impacts. The scale and nature of those benefits will only be clear once the FASI-S airspace change process has been completed. The timing and progress of this programme is outside of the control of Gatwick Airport Limited.</p> <p>As part of an obligation to provide 'Core Services' under its licence, NATS delivers a London Approach Service that is capable of meeting on a continuing basis any reasonable level of overall demand for such services; this includes services provided to an aircraft on its final approach or initial departure to/from Gatwick.</p> <p>NATS has existing measures in place to manage the flow of traffic in the London Terminal Manoeuvring Area (LTMA) efficiently and to ensure the sector/airspace loading remains within safe operational parameters.</p>	N/A	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.8	SID Splits	GAL's intention to adopt sequencing techniques to optimise departures with the NRP with a view to reducing departure-departure separations in peak periods is noted. However, the modelling of the capacity of the NRP has not taken the effects of this sequencing into account and, consequently, delays are understated and capacity overstated in the critical hours for departures.	JLAs	<p>In 2029, sequencing of departures will be optimised such that sequencing successive departures in a departure-departure (DD) sequence can generally be avoided or separated by an arriving aircraft, just like in the existing operation. Further enhanced procedures are not necessary for the NRP forecast but would add resilience, so are planned whether the NRP goes ahead or not.</p> <p>These projects have a positive but small effect over the baseline scenario as an arrival between departures on a single runway creates a gap that allows almost any DD</p>	N/A	Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		It is considered that limited reliance can be placed on improved air traffic control techniques to reduce departure-departure separations and that capacity should be assessed in the first instance based on current processes and achieved separations.		<p>pair to depart without impacting the flow of arrivals. In a dual runway system, projects to reduce the impact of aircraft departing in similar direction by adding tool support will help controllers standardise performance.</p> <p>Work to reduce the impact of wake vortex separation requirements by adopting a standard already in use at Heathrow, will reduce sequencing complexity and improve resilience. Resulting holding times will therefore be resilient against unusual SID balances caused by any off-schedule activity, restrictions in departure airspace, or variation between the forecast and actual schedule.</p> <p>These projects, combined with other planned reductions in DD separations noted in Appendix 1, will enable GAL to reduce average DD separations for medium wake category from 70s currently to 60s.</p>			
17.9	SID Splits (annual & Leg)	Noted	JLAs	<p>SID usage forecasts were developed using the following methodology:</p> <p>Apply historical 2018 baseline SID split based on market being flown (e.g. Asia, North America, Europe, etc.). Aircraft flying westward in 26 runway direction, predominantly take the straight on SIDs. Aircraft flying eastwards take the SIDs turning north, then east shortly after take off (Route 4). WIZAD SID serves the same destination as Route 4 SIDs and is exclusively used tactically in event of disruption to Route 4 operations, e.g. due to weather. This arrangement is sufficient to support all the current and future capacity forecasts.</p> <p>The future WIZAD SID usage is 'carved' out of ADM, FRA, and LAM, but only for narrow body aircraft between 0700-2300 local. This was assumed not to increase airfield capacity but rather in anticipation of increased disruption to the north of Gatwick due to expected increase in airspace usage across the London Terminal Manoeuvring Area. In those circumstances, to avoid excess delay air traffic control would divert traffic southwards.</p>	N/A	Annex 8 Note on Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.10	SID Splits (Busy day)	It is not accepted that Gatwick's SID structure has been fully taken into account in its capacity modelling and demand forecasting as no account has been taken of the need to sequence aircraft on the ground to optimise the distribution of aircraft by SID. As a consequence, the capacity modelling	JLAs	<p>Gatwick's SID structure has been fully taken into account in its capacity and forecasting assumptions.</p> <p>The busy day SID splits are based on Summer 2018 actual SID usage. Summer 2018 data is analysed to determine the typical departure SIDs used by aircraft serving each geographical region. This same regional SID</p>	N/A	Annex 8 Note on Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport to ES Appendix 4.3.1:	

		understates delay and overstates departure capacity.		<p>usage is applied to the forecast schedule based on the region the aircraft is flying to.</p> <p>On the modelled Busy Day, there is a Westerly SID bias of 55% West to 45% East in the early morning peak period 0500-0800 UTC. The current SID bias is greater in the hours where the arrivals and departures are more evenly balanced and the requirement to sequence DD is reduced as an arrival may then be sequenced between successive departures on the same SID route.</p> <p>The following table shows the balance of arrivals and departures and departure SID bias in the first 4 hours of the day 0500 – 0800 UTC.</p> <table border="1"> <thead> <tr> <th>Hour UTC</th> <th>% Departures</th> <th>%Westerly SID</th> <th>Hourly demand</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>75%</td> <td>52%</td> <td>64</td> <td>Balanced SIDs</td> </tr> <tr> <td>6</td> <td>62%</td> <td>49%</td> <td>63</td> <td>Balanced SIDs</td> </tr> <tr> <td>7</td> <td>52%</td> <td>64%</td> <td>69</td> <td>Balanced Arrivals / Departures</td> </tr> <tr> <td>8</td> <td>68%</td> <td>60%</td> <td>59</td> <td>Imbalance = reduced demand</td> </tr> </tbody> </table> <p>Note that for the first 2 hours of the day there is very little SID bias and in the 0700 hour the SID bias is not an issue as there is an even balance of arrivals and departures. In the 0800 hour arrivals would need to be sequenced between 20% same route departures for optimal sequencing, however as 32% of movements are arrivals, this is manageable. Allowance is made with significantly reduced demand in the 0800 hour.</p>	Hour UTC	% Departures	%Westerly SID	Hourly demand	Comment	5	75%	52%	64	Balanced SIDs	6	62%	49%	63	Balanced SIDs	7	52%	64%	69	Balanced Arrivals / Departures	8	68%	60%	59	Imbalance = reduced demand		Forecast Data Book [APP-075]
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8	68%	60%	59	Imbalance = reduced demand																											
17.11	Holding between runways	GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.	JLAs	<p>It is anticipated that 90-95% of landing aircraft (all Codes) will land and cross the northern runway without needing to hold between the runways. Runway exits are positioned in the final third of the runway, allowing ample time for the departure on the northern runway to rotate and vacate the runway.</p> <p>The boundary of an instrumented runway is considered to be the runway holding position or 90m from the runway centreline. However as per today's operation and in line with EASA CS-ADR_DSN.B.165, 77.5m from runway centreline will be considered as the point where aircraft have fully vacated the runway before landing or take-off clearance is issued to the next movement. This is with the proviso that the vacating aircraft's tail is at or beyond 77.5m and it continues to move forward without stopping.</p> <p>Standard stop bar arrangements would not be appropriate to accommodate the largest Code C aircraft when and if</p>	N/A	Annex 9 Response to Issues Raised in York Aviation Report related to obstacles and Safety to ES Appendix 4.3.1: Forecast Data Book [APP-075]																									

				<p>they need to stop between the runways. Gatwick is therefore proposing offset stop bars with related airfield signage which would enable pilots to position different types of Code C aircraft clear of both runway strips.</p> <p>These may be reinforced with other measures such as autonomous runway incursion warning system which would ensure separation between aircraft crossing the live runway and the arrivals or departures.</p> <p>These arrangements are safe and effective.</p>			
17.12	End around taxiways	GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.	JLAs	<p>The end around taxiways (EATs) have not been designed to be independent. They are within the runway safety zones.</p> <p>Aircraft using them would require clearance to cross the ends of the runways.</p> <p>It is anticipated that 90-95% of landing aircraft (all Codes) will land and cross the northern runway – without needing to hold between the runways – 'Land and Cross Behind'.</p> <p>Gatwick anticipates that <5% of wide body aircraft would need to utilise either the EAT or taxi to the end of runway.</p> <p>All of the points above have been factored into calculations for runway capacity.</p>	N/A	Annex 9 Response to Issues Raised in York Aviation Report related to obstacles and Safety to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.13	Juliet Taxiway Multi coding	GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.	JLAs	<p>The proposed arrangement is not dissimilar from the current multi code taxiway arrangements of Juliet (which is configured for Code 'C' aircraft between Whiskey and November and Code 'F' from November westward).</p> <p>The taxiway will have clear standard signage designating the taxiway codes, and relevant directional guidance will be provided by the Air Traffic Ground Controller.</p> <p>Stop bars will be installed at appropriate points to clearly notify and prevent aircraft from using the wrong taxiway.</p> <p>The proposed configuration has been reviewed by the CAA and no safety concerns have been raised.</p>	N/A	Annex 9 Response to Issues Raised in York Aviation Report related to obstacles and Safety to ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.14	Passenger service and efficiency of	Passenger service and efficiency of airfield configuration	JLAs	Through NRP the airfield layout is improved through the follow developments:	N/A	ES Chapter 5: Project Description [APP-030]	

	airfield configuration			<ul style="list-style-type: none"> The additional runway capability results in material reductions in departures holding times in 2038 compared to 2018. Lima extension provides dual taxi routings between Uniform and Lima providing additional resilience. Charlie Box provides an additional holding area accessible from multiple directions on the airfield and keeps departures away from the arrival taxi routes. The capacity of Charlie Box helps to optimise sequencing and builds in enhanced resilience. Juliet bypass maintains sequencing capability for Easterly operations. Additional Pier (Pier 7) located on westerly side of the core airfield, away from traffic from other central piers providing additional pier served capacity in an efficient location for traffic flow. The layout of the airfield is operationally efficient and performs better overall than the current airfield layout. 			
17.15	Passenger service / Pier 7	GAL's position is noted. It is accepted that these are matters that can be determined at the detailed design stage and would need to be confirmed as acceptable by the airlines.	JLAs	<p>The process of selecting the location for additional Pier served capacity considered a range of options and Pier 7 was deemed the most efficient with regard to airfield flow.</p> <p>Automated Vehicle technology is developing rapidly. Given the developments to date and ongoing initiatives it is reasonable to assume that full size autonomous buses capable of carrying c.40 passengers will be available for operational use by the end of the decade. Based on that assumption:</p> <p>Journey times from North and South Terminals to Pier 7 are estimated at 3.5 minutes and 6 minutes, with a round trip taking 15 mins and 18 mins respectively (allowing for loading and unloading of passengers). The journey times are lower than walking times to certain pier served stands.</p> <p>At peak times (assuming 6-8 aircraft departures per hour from Pier 7, requiring transport of 1,200 – 1,600 passengers) an AV would be required to depart every 3 - 4 minutes from each terminal, providing frequent opportunities for passengers to reach the pier.</p>	N/A	<p>Matter 11: NRP Case - Passenger Service Levels for Pier 7 - Viability and plausibility of remote Autonomous Vehicle operation to serve Pier 7 of Annex 7 to ES Appendix 4.3.1: Forecast Data Book [APP-075]</p> <p>ES Chapter 3: Alternatives Considered [APP-028]</p>	

17.16	Apron Stand capacity	This is a matter for GAL, the CAA and the airlines.	JLAs	<p>Gatwick Airport Limited (GAL) operates under a set of 'Commitments', a legally binding contractual undertaking between GAL and its airline customers. This is underpinned by an economic license granted by the UK Civil Aviation Authority (CAA) under the Civil Aviation Act 2012.</p> <p>One of the core commitments is delivering an agreed Pier service level (PSL). The planned number of pier served stands on Pier 7 and those being delivered through the Pier 6 extension are sufficient to deliver the required PSL commitment.</p>	N/A		
17.17	Two operational runways	The ability of the NRP to improve the resilience of the airfield at current traffic levels is accepted	JLAs	Given the levels of current and forecast traffic at Gatwick, it is appropriate that the northern runway is brought into operation, as proposed, in order to add resilience to the operation of the airport.	N/A	N/A	
17.18	Aviation Capacity and Forecasting, and Socio-Economics	<p>Criticisms were made in November 2022 of the basis of the socio-economic impact assessment, particularly in relation to its reliance on Gatwick being the only airport to increase its capacity over the period of its plans, an overstatement of the fare and user benefits arising from the NRP that underpinned the economic appraisal. Criticisms were also made of the robustness of the methodology used to assess the wider economic benefits deriving from the connectivity offered by growth at Gatwick, in particular the failure to use available data on how UK airports are used and the origins of passenger demand. The Authorities were promised further explanation of the methodology in January 2023, and it was understood that the Applicant would be revising its modelling to take the criticisms into account. To date no further information has been provided and, as a consequence, the economic case cannot be considered robust.</p>	JLAs	<p>The detailed information provided in ES Appendix 4.3.1: Forecast Data Book (FDB) demonstrates that these issues have been noted and addressed. They have also been discussed at length in the Technical Working Group meetings and continue to be the subject of engagement through the SoCG process. Plans for other airport expansion are directly addressed in the FDB at sections 3 and 7 - and sensitivity tests set out in Annexes 4 and 5. The origin of passenger demand is directly addressed in section 5 and in the 'Pipeline report' provided at Annex 6.</p> <p>Please also refer to the GAL response to those issues identified under the 'Socio-Economic / Economic - Detailed Information Requested' section in the related March 2023 issues tracker.</p>	Socio-economic issues have been consolidated and responded to in Issue Table 2 Socio-Economics and Economics.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
17.19	Baseline Case	In the absence of further information, we are concerned that GAL has put forward a Baseline Case that may be undeliverable, particularly in relation to the assumed increase in runway movement rate on a single runway, and this potentially	ESCC	N/A	As explained in the application and in the TWG discussions, the assumed runway capacity movement rate is based on operational experience already achieved and demonstrated at Gatwick Airport.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		<p>undermines the validity of the assessment of the effects of the development if the Baseline Case is set too high.</p> <p>Further technical discussion with the local authorities (jointly) is required prior to (and subsequent to) the submission of the DCO, to understand how the baseline capacity would be delivered. It is also not clear if the works required to support the baseline would require planning permission and so are, in effect, part of the project.</p>			<p>The Baseline has also been modelled so as to demonstrate it is deliverable from a capacity perspective. The peak runway movement rate has not been increased above the current level of 55.</p> <p>Section 4.4 of Chapter 4: Existing Site and Operation of the ES lists those projects incorporated into the future baseline, being those which are currently consented or under construction and which proceed in the absence of the Project.</p>	<p>ES Chapter 4: Existing Site and Operation [APP-029]</p>	
17.20	Capacity (Hourly Movements)	<p>GAL has not demonstrated that 70 movements per hour is attainable through using the northern runway along the main runway, which has implications for the validity of the forecasts 'With Development'.</p> <p>If the increase in hourly movements is not achievable then the assessed impacts, positive and negative, will have been wrongly stated. Based on our current assessment of the information provided, we would not be confident that either the Baseline Case or 'With Development' capacities have been robustly assessed</p>	ESCC	N/A	<p>The figure of 70 movements per hour is only illustrative and depends on mix of traffic. With an ideal mix, the achievable throughput is 80 per hour and this then reduces in hours where there is an imbalance of arrivals and departures and a mix of heavy and medium sized aircraft. As a consequence, the hourly throughput capability varies through the day but 70/hr is considered to be a reasonable maximum given the mix of traffic served.</p> <p>Modelling has been undertaken to demonstrate that the demand represented by the forecast schedules can be accommodated with acceptable levels of runway holding.</p> <p>Please also refer to the response in Row 17.3 above.</p>	<p>Annex 7 Response to Capacity Questions and Issues Raised in York Aviation Report to ES Appendix 4.3.1: Forecast Data Book [APP-075]</p>	
17.21	Capacity Assessments	<p>Lack of information or detail on how capacity has been assessed and validated across the airfield as a whole.</p> <p>The Baseline forecast is presented as a capacity constrained forecast so verifying the level of this constraint is key. The 'With Development' forecast appears to be unconstrained and assumes that the capacity delivered by the proposals will be sufficient to meet demand.</p>	ESCC	N/A	<p>The comment is not fully understood. Capacity issues are addressed in Table 17 of this tracker. The level of constraint is represented by the future baseline forecast, which forecasts the maximum predicted usage of the existing airfield. That constraint would be released by the NRP, although the NRP would make an important contribution to meeting demand, rather than fully satisfying it. ro</p>	N/A	

Table 18: Waste and Materials

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
18.01	Soil removal	CBC seeks more clarity on this aspect of the project as spoil removal will have considerable impact on the local road network and the construction traffic could produce considerable noise and dust emissions. In its response to the PEIR the council flagged its concern regarding the potential use of the Gatwick Goods Yard for aggregates, and the potential for noise disturbance to local residents, particularly at night. This needs to be addressed in the Construction strategy. Where spoil is dumped or placed in the short term does need careful consideration. In paragraph 3.10.9. GAL mention environmental, ecological and landscaping considerations but drainage is also a key consideration given the flood plain and the risk of off-site flooding. It isn't clear if Pentagon Field would be receptor site for the spoil.	CBC	N/A	<p>The Construction Resources and Waste Management Plan demonstrates how waste and the use of resources have been considered during the Project and to set out measures for managing waste and resources during construction to meet legislative and policy requirements.</p> <p>Section 19.9 of ES Chapter 19 Agricultural Land Use and Recreation addresses how the placement of spoil and restoration.</p> <p>Construction of the NRP does not require use of the Crawley Good Yard and therefore its use is not assumed in the Project's construction plans and the DCO does not seek powers to use it.</p>	<p>ES Appendix 5.3:2: Code of Construction Practice, Annex 5 - Construction Resources and Waste Management Plan [APP-087]</p> <p>Section 19.9 of ES Chapter 19: Agricultural Land Use and Recreation [APP-040]</p>	
18.02	Waste/Central Area Recycling Enclosure (CARE)	GAL PEIR documents made ref to demolition of existing CARE facility and a CARE facility, encompassing a new 22m high building and 50m stack. No further details were shared. WSCC response stated that there was a lack of detail about the CARE facility, that has the potential for significant environment effects in it's own right; that the EIA must include full details of the CARE facility; Plume assessments (LVIA).	WSCC	N/A	<p>Details of the CARE facility are set out in ES Chapter 5 Project Description. The CARE facility has been assessed as part of the Environmental Statement. Chapter 8 Landscape, Townscape and Visual Resources and ES Chapter 13 Air Quality assesses the impact of plumes.</p> <p>The potential for a visible plume at the CARE facility has been assessed. A maximum of 5 hours of visible plume are predicted annually and it is anticipated that there would be no visible plume greater than 20 metres in length at any time of year</p>	<p>ES Chapter 5: Project Description [APP-030]</p> <p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-038]</p> <p>ES Chapter 13: Air Quality [APP-038]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					or during any atmospheric conditions. No significant adverse effects are predicted.		
18.03	Waste baseline	Waste baseline - how much currently managed per annum? What is the waste make up in terms of type (food, packaging, other) and volumes. What is exported (residual waste) for further treatment, recycling or LF?	WSCC	N/A	This level of detail is not set out within the DCO application. GAL would be happy to meet with WSCC to discuss these specific points.	N/A	
18.04	CARE Facility	"Current CARE Facility - How is waste currently managed at the existing facility - processes, technology, heat capture and usage from boiler (water? heating?).	WSCC	N/A	This level of detail is not set out within the DCO application. A brief description of the existing facility is set out in Paragraph 5.2.50 of ES Chapter 5 Project Description. GAL would be happy to meet with WSCC to discuss these specific points.	ES Chapter 5: Project Description [APP-030]	
18.05	Heat Capture	What % of demand for the airport can it supply (heat capture), assuming nothing is exported?"	WSCC	N/A	This level of detail is not set out within the DCO application. GAL would be happy to meet with WSCC to discuss these specific points.	N/A	
18.06	Waste Forecasts	Waste Forecasts - with and without NRP - have any projections/forecasts been prepared?	WSCC	N/A	GAL is considering this comment as part of developing its operational waste strategy.	N/A	
18.07	Waste Policy	How are GAL taking account of Planning Policy related to waste (West Sussex Waste Local Plan, National Planning Policy for Waste, Waste Management Plan for England, guidance, Waste Framework Directive (and waste planning regs), Waste Hierarchy)	WSCC	N/A	ES Chapter 2 Planning Policy Context sets out the policies that have influenced the preparation of the ES, with each chapter of the ES setting out the specific plans and policies that have influenced the assessment. The policies taken into consideration are set out in Section 2 of ES Appendix 5.3.2 Code of Construction Practice – Annex 5 – Construction Resources and Waste Management Plan. This includes policies at national and local levels such as the Waste Management Plan for England and West Sussex Waste Local Plan. The Planning Statement provides a summary of the plans and policies that have	ES Chapter 2: Planning Policy Context [APP-026] ES Appendix 5.3.2: Code of Construction Practice, Annex 5 – Construction Resources and Waste Management Plan [APP-087] Planning Statement [APP-245]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					been considered by GAL when undertaking its assessment of the planning balance.		
18.08	MRF	How with the proposed MRF work? a. Will all non-food waste will go through it? b. What technology is proposed (manual/automated)? c. What are the expected targets and tonnages for the MRF in terms of recycling, landfill etc.	WSCC	N/A	This level of detail is not set out within the DCO application. GAL would be happy to meet with WSCC to discuss these specific points.	N/A	
18.09	Boiler(s)	How will the proposed boiler(s) work? a. Can they process more than food waste to recover heat energy from other residual waste? b. When will the 2nd boiler come online, and how will that work with the existing stack/boiler? c. Could a single boiler be used? d. Could energy be recovered as well? e. How will, and how much heat will be captured by the new CARE facility?	WSCC	N/A	There would be two biomass boilers (one pre-existing to provide for the relocated 650 kw plus an additional 450 kw to provide for growth). This level of detail is not set out within the DCO application. GAL would be happy to meet with WSCC to discuss these specific points.	N/A	
18.10	Stack	The Stack is proposed to be 50m - how as its height/width been determined? a. what modelling has been undertaken? What pollutants modelled for any permit? Have HCl, dioxins etc been considered? b. Have discussions or agreements taken place with the Environment Agency? c. Have agreements been made with the CAA regarding having a 50m stack, in terms of safety, lighting etc?	WSCC	N/A	The main CARE facility building would be up to 22 metres in height with a biomass boiler flue (stack) that would be up to 48 metres above ground level (this height allows effective dispersion whilst staying within safeguarding surfaces). This is shown on a parameter plan which is secured by Article 6 of the draft DCO. a. ES Chapter 13 assesses air quality. Nitrogen dioxide (NO ₂), particulate matter (PM ₁₀ and PM _{2.5}), carbon monoxide (CO), sulphur dioxide (SO ₂) and Volatile Organic Compounds (VOCs) are considered for the protection of human health. Nitrogen oxides (NO _x), sulphur dioxide (SO ₂) and ammonia (NH ₃) are considered for the protection of	ES Chapter 13: Air Quality [APP-038] Section 3.5 of the Design and Access Statement [APP-253] ES Appendix 8.4.1: Landscape, Townscape and Visual Impact Assessment Methodology [APP-109]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
		<p>d. Have stack heights and finishes been considered as part of the viewpoints for landscape assessment purposes.</p> <p>e. Any assessment of potential plumes and associated visual impact undertaken?</p>			<p>ecosystems. Emissions from the CARE facility of sulphur dioxide (SO₂), volatile organic compounds (VOCs) and carbon monoxide (CO) have been added to assess potential impacts. No other pollutants have been identified that would be likely to give rise to significant air quality effects.</p> <p>b. Discussions with the Environment Agency have been on-going.</p> <p>c. Aerodrome safeguarding has been considered as part of development of the masterplan. Section 3.5 of the Design and Access Statement (APP-253) sets out the various requirements that GAL has considered, which extends to the design of the CARE facility.</p> <p>d. The proposed ZTV includes a location for the 48 m high stack at the central airfield maintenance and recycling (CARE) facility, as the tallest element of the Project.</p> <p>e. It is predicted that from the CARE facility there would be no visible plumes greater than 20m in length during any part of the year. Significance of the plume is an aspect that has been considered in ES Chapter 8: Landscape, Townscape and Visual Resources.</p>	ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	
18.11	Stack Emissions	What consideration has been given to emissions to air (in particular from the stack), what pollutant emission limits will apply?	WSCC	N/A	<p>ES Chapter 13 assesses air quality. Nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), sulphur dioxide (SO₂) and Volatile Organic Compounds (VOCs) are considered for the protection of human health. Nitrogen oxides (NO_x), sulphur dioxide (SO₂) and ammonia (NH₃) are considered for the protection of ecosystems. Emissions from the CARE facility of sulphur dioxide (SO₂), volatile organic compounds (VOCs) and carbon monoxide (CO) have been added to assess potential impacts.</p>	ES Chapter 13: Air Quality [APP-038]	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
18.12	Cumulative Impacts from Permitted EFW	Have cumulative impacts been considered, including from the Permitted EFW at Brookhurst Wood? Have the emissions (NO2) contours from the Brookhurst Wood EFW been considered?	WSCC	N/A	<p>Section 13.11 of ES Chapter 13 Air Quality sets out the results of the cumulative effects associated with the Project and other activities or proposed developments.</p> <p>The site is included in the list of developments in Table 20.4.5 ES Chapter 20 Cumulative Effects and Inter-Relationships (reference 19). This development would have been considered within the transport modelling and traffic data used in the air quality assessment. In addition, the contribution from the EFW facility would have been considered within the Defra modelled background data used in the assessment.</p>	<p>Section 13.11 of ES Chapter 13: Air Quality [APP-038]</p> <p>Table 20.4.5 contained in ES Chapter 20: Cumulative Effects and Inter-Relationships [APP-045]</p>	
18.13	Waste management methods	What consideration has been given to alternative waste management methods? For example, could the food waste be sent for composting?	WSCC	N/A	<p>Alternatives for waste management are set out in Section 3.6 of ES Chapter 3 Alternatives Considered. Two options were considered as part of the appraisal, both of which were on-site waste management facilities.</p>	ES Chapter 3: Alternatives Considered [APP-028]	
18.14	Storage of waste impacts	What consideration has been given the potential impacts on the water environment from the storage of waste	WSCC	N/A	<p>ES Chapter 11 Water Environment considers the risk of flooding which could impact infrastructure receptors including waste management facilities.</p> <p>ES Appendix 5.3.4 Major Accidents and Disasters sets out measures to manage accidental spillages or structural failures including of hazardous materials.</p>	<p>ES Chapter 11: Water Environment [APP-036]</p> <p>ES Appendix 5.3.4: Major Accidents and Disasters [APP-089]</p>	
18.15	Impacts on Health from Stack Emissions	What consideration has been given to impacts upon human health, in particular from stack emissions (have UK Health Security Agency (UKHSA) and Environment Agency (EA) been involved)? a. How would this feed into the wider assessments and in combination and cumulative effects?	WSCC	N/A	<p>ES Chapter 18: Health and Wellbeing includes and assessment of air quality effects to population health. This is based on modelling results from ES Chapter 13: Air Quality, which has taken the CARE facility stack emissions into account. The UKHSA have been consulted on the health assessment.</p> <p>The waste (CARE facility) building has been assessed as one of the on-site buildings and processes that make-up the airport. This is part of the models and assessments</p>	<p>ES Chapter 13: Air Quality [APP-038]</p> <p>ES Chapter 18: Health and Wellbeing [APP-043]</p>	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					of ES Chapter 13: Air Quality [APP-038], the residual effects of which are inputs to ES Chapter 18: Health and Wellbeing [APP-043] The ES chapters includes appropriate and proportionate assessments of combined and cumulative effects.		
18.16	Environmental Permit	Will the facility be subject to an Environmental Permit (and will this be an EA or Local Authority regulated permit)?	WSCC	N/A	The likely secondary consents and permits for the construction and operation of the Project are set out in the List of Other Consents and Licences.	List of Other Consents and Licences [APP-264]	
18.17	Use of Biomass	Will the biomass element of the facility be considered a 'renewable energy' and 'low carbon' proposal (i.e. in terms of NPPF as a biogenic waste and replacing alternative conventional fuels)?	WSCC	N/A	UK Government considers biomass to be a renewable energy source. In 2023 the Department for Energy Security and Net Zero published the Biomass Strategy explaining how biomass will contribute to achieving the UK's 2050 net zero target.	N/A	
18.18	Odour, noise, litter and vermin at CARE facility	How will odour, noise, litter and vermin be controlled at the CARE facility and how will this be assessed? a. Odour will be of particular interest given food waste involved. b. How will received waste managed to minimise odour, would any building have negative pressure/odour suppression systems etc? c. How will waste be stored/transported/contained (sheeted/containerised etc)?	WSCC	N/A	An assessment of odour effects is set out in Section 13.10 of ES Chapter 13 Air Quality. Paragraph 13.10.185 states " The CARE facility design is at the outline stage, however odour risk would be managed following best practice waste handling procedures. Following best practice methodology to contain and reduce odour effects from the facility no significant impacts would occur. No odour impacts would expect to occur from the plume as VOCs would be burnt off in the incineration process".	ES Chapter 13: Air Quality [APP-038]	
18.19	CARE facility operating hours	Will the CARE facility have fixed operating hours	WSCC	N/A	The airport operation is 24 hours per day and the CARE facility is expected to be operated in line with this need.	N/A	
18.20	CARE facility	What is the final location of the CARE facility and the justification for its location?	HDC	N/A	Two options for the relocation of the CARE facility were identified as part of the options appraisal.	Para 3.6.133 of ES Chapter 3: Alternatives	

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
					<ul style="list-style-type: none"> Option K1 – in an area currently used as valet north ‘Flying Pan’ car park (north of the cargo facility); and Option K2 – in an area currently used as car park self-park north. <p>Whilst Option K1 scores marginally better in terms of the business case, surface access and environment criteria, both options perform well overall, and were taken forward as part of the consultation on the Project in Autumn 2021. The consultation identified these two possible locations for the new CARE facility and asked respondents which location would be preferred.</p> <p>Following the Autumn 2021 Consultation, Option K1 was selected. Respondents preferred its central location, noting the shorter journey from the central terminal areas where the bulk of the waste originates, its relative remoteness from the airport boundary and less visibility impacts compared to Option K2.</p>	Considered [APP-028]	

Table 19: Project General, Mitigation and Other Matters

Reference	Subject	Issue Raised	Source	GAL Response as captured in the Trackers shared August 2023	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
19.1	Other Matters	Request for explanation as to why boundary changes have been made to the DCO application.	JLAs	An explanation of the changes to the Project site boundary is contained in paragraph 5.2.4 of ES Chapter 5: Project Description.	The ES explains the final scheme proposals and the rationale for its design and the alternatives considered.	ES Chapter 3: Alternatives Considered [APP-028] ES Chapter 5: Project Description [APP-030]	
19.2	Other Matters	Engagement to discuss governance issues and further discussion on possible thresholds and community funds (raised Nov 22).	JLAs	N/A	<p>Draft terms of reference and membership for a strategic oversight group were provided by GAL on 27th July 2023, aimed at resolving post-application acceptance matters and including matters relating to the DCO Requirements and s106 obligations. GAL would welcome the LAs view on how it envisages discussions and negotiations taking place between GAL and LAs on the s106 Agreement now that the application has been accepted for Examination.</p> <p>Details of the proposed mitigation are detailed in the Planning Statement [APP-245] and ES Appendix 5.2.3 Mitigation Route Map [APP-078].</p> <p>Specifically on the community fund, Table 17.2.1 of ES Chapter 17: Socio-Economics explains the proposed approach to the new Gatwick Community Fund, proposed to be secured under the new Section 106 Agreement.</p> <p>GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process.</p>	ES Chapter 17: Socio-Economics [APP-042] ES Appendix 5.2.3: Mitigation Route Map [APP-078] Planning Statement [APP-245]	

19.3	Other Matters	Evidence supporting conclusions on the need for (and operation of) the waste/CARE facility, including demolition of the existing facility.	JLAs	The Project proposals for the Central Area Recycling Enclosure facilities are set out in paragraphs 5.2.50 to 5.2.53 of ES Chapter 5: Project Description.	The ES explains the final scheme proposals and the rationale for its design and the alternatives considered.	ES Chapter 3: Alternatives Considered [APP-028] ES Chapter 5: Project Description [APP-030]	
19.4	Overarching Documentation	Draft DC Order, or at least draft text for Requirements, including information on proposed approach and fees for discharge of requirements.	JLAs	A note titled 'Approach to Securing Mitigation' was issued to the LAs on 28th April 2023 setting out the proposed role and content of the draft Development Consent Order (dDCO) and Section 106 Agreement. The dDCO has been submitted as part of the DCO Application and is available to view on PINS website. The proposed Requirements are included in Schedule 2. A summary of the proposed Heads of Terms for the new section 106 Agreement and the DCO Requirements is provided in Table 5.2 of the Planning Statement.	GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process.	Draft Development Consent Order [AS-004] Planning Statement [APP-245]	
19.5	Overarching Documentation	Draft Mitigations Route Map	JLAs	The Mitigation Route Map has been submitted as part of the DCO Application and is available to view on PINS website.	GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process.	ES Appendix 5.2.3: Mitigation Route Map [APP-078]	
19.6	Overarching Documentation	Draft s106 – Heads of Terms, and proposed drafts for specific obligations.	JLAs	A note titled 'Approach to Securing Mitigation' was issued to the LAs on 28th April 2023 setting out the role and content of the draft Development Consent Order (dDCO) and Section 106 Agreement.	Table 5.2 of the Planning Statement, submitted as part of the DCO Application, contains the proposed Heads of Terms for the new Section 106 Agreement. The Planning Statement is available to view on PINS website.	Table 5.2 of the Planning Statement [APP-245]	
19.7	Overarching Documentation	Draft Statement of Reasons	JLAs	N/A	The Statement of Reasons has been submitted as part of the DCO Application and is available to view on PINS website.	Statement of Reasons [APP-010]	
19.8	Overarching Documentation	Draft ES Chapter Description of Development	JLAs	N/A	ES Chapter 5 containing the Project Description has been submitted as part of the DCO Application and is available to view on PINS website.	ES Chapter 5: Project Description [APP-030]	
19.9	Overarching Documentation	Draft ES Chapter Approach to Assessment	JLAs	N/A	ES Chapter 6 setting out the Approach to the Environmental Assessment has been	ES Chapter 6: Approach to	

					submitted as part of the DCO Application and is available to view on PINS website.	Environmental Assessment [APP-031]	
19.10	Overarching Documentation	Draft Scheme Layout Drawings	JLAs	Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022.	The DCO Application was accompanied by a suite of application drawings, including Works Plans and Parameter Plans, along with further detail in the Design and Access Statement.	Book 2 containing the Application Drawings [APP-013 to APP-025]; and the Design and Access Statement , split across five volumes [APP-253 to APP-257]	
19.11	Overarching Documentation	Justification for the runway movement rate that is claimed for the two runways as this relies on one minute separations between all departing aircraft regardless of departure route, which is not currently permitted in the UK;	JLAs	Annex 7 to ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] sets out correspondence between GAL and York Aviation, including engagement on Departure-Departure separation times between different aircraft types provided in August 2022. Annex 8 of the FDB contains a note on the Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport, also provided to York Aviation in August 2022. This matter has been discussed extensively through the TWGs and is being addressed through the SoCG process. The Annexes demonstrate GAL's engagement on these issues. That engagement continues through the SoCG process.	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
19.12	Overarching Documentation	Clear explanation for the relationship between the use of the runway and the projected use of specific departure routes, including the implications for noise assessment and transparency about the relationship between the assumptions used and implications of future potential airspace change;	JLAs	Annexes 7 and 8 to ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] contain detailed notes on airspace assumptions and a Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport. The notes explain the departures routes that have been considered in the Project forecasts. The air noise assessment within the Environmental Statement assumes the routing of aircraft to and from the main runway and from the northern runway would remain as it is today, as discussed in Section 14.4 of ES Chapter 14: Noise and Vibration. This is because the Project can operate using these routes without need for airspace change. When the likely outcome of the FASI-South airspace is known then the	N/A	ES Appendix 4.3.1: Forecast Data Book [APP-075] ES Chapter 14: Noise and Vibration [APP-039] ES Chapter 6: Approach to Environmental Assessment [APP-031]	

				noise impacts of that change will be assessed as part of that process. Further details of FASI-South and the approach are set out in ES Chapter 6: Approach to Environmental Assessment.			
19.13	Overarching Documentation	Explanation of the different socio-economic benefits of the proposal, particularly in terms of where such benefits would arise and how they would impact the individual host authorities.	JLAs	The socio-economic effects of the Project are explained in Section 17.9 of ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and sets out where the effects are assessed to be beneficial under each assessment year. Section 8 of the Needs Case (Doc Ref. 7.2) [APP-250] also summarises the economic benefits of the Project.	N/A	ES Chapter 17: Socio-Economics [APP-042] Needs Case [APP-250]	
19.14	Assessment assumptions	It is noted in paragraph 3.1.5 and 3.1.6 that 'consideration of the projects to be included in the future baseline case' is still ongoing and that there has been a review of the parking requirements and parking impacts. CBC would like to understand what the baseline assumptions are now given as there have been some significant changes to parking, office, hotels and drainage proposals and the conclusions in this document cannot be supported or understood without further information. It is unclear what assumptions now underpin the highway modelling and it is questionable how these assumptions have been verified or deemed correct when work on other key elements such as the Airport Surface Access Strategy are still 'progressing'.	CBC	N/A	Reference to statements contained in the Summer 2022 Consultation Document have been superseded, notably the update of future developments and infrastructure assumptions used for transport modelling. These updates were completed prior to the Summer 2022 Consultation and included local plan development information supplied by the Local Authorities. Information relating to transport modelling assumptions, outputs and surface access strategy were presented in Topic Working Groups and contained in the DCO documents.	Transport Assessment [APP-258] Transport Assessment, Annex B: Strategic Transport Modelling Report [APP-260] ES Appendix 5.4.1: Surface Access Commitments [APP-090] ES Chapter 5: Project Description [APP-030]	
19.15	S106 Contributions	CBC would be keen to explore with GAL through the DCO S106 to seek an annual funding contribution from GAL towards a dedicated Planning Investigations / Enforcement Officer to be completed by the joint Local Authorities and funding towards any legal resources incurred by that authority and resources for any Public Inquiry in relation to unauthorised parking.	CBC	N/A	GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process. Please refer to Row 19.2 for details.	Draft Development Consent Order [AS-004] Planning Statement [APP-245]	

19.16	Community funds	CBC would wish to see engagement now on matters such as community funds or suggested thresholds as mechanisms to implement any suggested approach could take time to work through due to governance issues and the need for discussion and agreement between the various parties who may be involved.	CBC	N/A	GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process. Please refer to Row 19.2 for details.	Draft Development Consent Order [AS-004] Planning Statement [APP-245]
19.17	Mitigation	CBC consider that there is an important area of mitigation missing from this presentation. A 'Type 4' mitigation should include mitigation to the Local Authorities for the ongoing monitoring of requirements and clauses of the legal agreement and the ongoing resource commitment to CBC as the lead authority for the subsequent approval of later designed phases of the scheme (comparable to reserved matters) for various later elements which this Council will have to administer.	CBC	N/A	GAL intends to progress its discussions with the JLAs in relation to the mitigation and the associated securing mechanisms through the Statement of Common Ground process. Please refer to Row 19.2 for details.	Draft Development Consent Order [AS-004] Planning Statement [APP-245]
19.18	Health and wellbeing impacts of Heathrow and Gatwick expansion	That the health and wellbeing impacts of both Heathrow and Gatwick airport expansion projects are considered by GAL in full through the Environmental Statement, with appropriate mitigation provided as required.	CBC	N/A	The approach to the consideration of cumulative effects with NRP together with Heathrow Third Runway is described in section 20.7.2 to 20.7.6 of Chapter 20 of the ES. Table 20.7.2 provides the cumulative effects assessment undertaken, that includes Health and Wellbeing. Please refer to Row 19.2 for details.	Section 20.7.2 to 20.7.6 (including Table 20.7.2) of ES Chapter 20: Cumulative Effects and Inter-relationships [APP-045]
19.19	Airspace Change	GAL continues to refer to no new flightpaths as a consequence of using the Northern Runway and that the wider FASI-S changes are not required to enable dual runway use. The Council is concerned that there is no acknowledgement of the inevitable interaction between airport growth and airspace changes. Realising the overall growth in aircraft movements envisaged, particularly when taking growth at other airports across the south of England into account, will necessitate changes to airspace as	HDC	N/A	GAL's position on FASI-S is set out in ES Chapter 6 (paragraph 6.2.15) and in the Noise Assessment at ES Chapter 14 (paragraph 14.5.7 and 14.9.147). The growth of aviation in the SE in response to forecast need and demand will require airspace modernisation and GAL is closely engaged in working with CAA and DfT, playing its full part in the modernisation programme. There are, however, three	ES Chapter 6 Approach to Environmental Assessment [APP-031] ES Chapter 14: Noise and Vibration [APP-039]

		part of the modernisation process. NATS are clear that FASI-S is required to enable growth through the London airspace system. GAL should acknowledge this overall dependency.			important points to take into account for the purposes of this application: <ul style="list-style-type: none"> 1. GAL does not require airspace change or new flight paths to operate the NRP; 2. The NRP forms part of Government's forecasts of future aviation capacity and is fully taken into account, for example, in the modelling published to support the Jet Zero Strategy. The examination can be assured, therefore, that it is being fully factored into the Government's airspace modernisation; and 3. That airspace modernisation process may alter flight paths across the south-east (particularly in the London area) but the nature of those changes cannot be known now and they will be the subject of their own consultation and environmental assessment process under the terms of the CAA's CAP 1616. 		
19.20	WIZAD Route	The increased use of the WIZAD route will result in increased overflight of Horsham District. FASI-S could itself be a driver for greater use of WIZAD.	HDC	N/A	GAL has responded to LPA concerns about the use of WIZAD SID through the provision of detailed information on existing and assumed future use in the TWGs. The position was set out in GAL's draft of the Operations and Capacity SOCG and the effects are taken into account in the Noise Chapter of the ES (APP-039) at 14.6.39. The assessment predicts no significant adverse effects.	ES Chapter 14: Noise and Vibration [APP-039]	
19.21	Mitigation	Proposals put forward by GAL to the Airports Commission work up to 2015 for additional runway capacity in the South East of England are relevant to the consideration of the NRP, these included £46.5m to help local authorities deliver essential community infrastructure, engagement	HDC	N/A	The application proposals mitigate their impacts consistent with policy and guidance on the relevant approach to take to requirements and obligations.		

		charter to support local landowners and businesses affected by the proposals, Community Flood Risk Forum, £10m Local Highway Development Fund, extension of the Noise Insulations Grants Scheme, among others. The Council has significant concern that the NRP proposals contain no comparable (and proportionate) mitigation offer.					
19.22	Conditions / Mitigation	Should the DCO be granted, HDC requests that GAL commits to limiting the airport to a two-runway operation allowing safeguarded land to be released and agree to a voluntary cap on passenger throughput in order to manage impacts on the health and wellbeing of communities affected by airport operations.	HDC	N/A	Considerations on the need for safeguarding are a matter for Government and do not form part of the Northern Runway Project. An aircraft movement cap is proposed as part of the Project.	N/A	
19.23	Demand Forecasts	Insufficient information has been provided by GAL to enable the basis of its demand forecasts, and how these relate to the capacity that may be provided through the simultaneous use of the Northern Runway, to be properly understood in adequate detail for the local authorities to be able to comment on the impact of the proposals. York Aviation requested further information from GAL regarding the basis of the demand forecasts and the assessment of capacity with and without development, but this has not been forthcoming.	ESCC	N/A	These matters are fully addressed in the application documents and in Table 16 of this tracker. They are also the subject of SoCG discussions.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	
19.24	Forecast other Airports	We are concerned that the forecasts as presented do not take into account the likely provision of a third runway at Heathrow at some point in the 2030s as this remains Government policy and airports seeking to make best use of their existing runways are required to demonstrate a need distinct from and not being met by the third runway at Heathrow. The forecast assessment has not taken this into	ESCC	N/A	See response to 19.27. The Forecast Data Book includes a sensitivity assessment for the introduction and operation of R3 at Heathrow.	ES Appendix 4.3.1: Forecast Data Book [APP-075]	

		<p>account and also does not consider the prospect of other airports increasing their capacity, including the increase already consented at Stansted.</p> <p>At the very least, these potential increases in capacity elsewhere should have been subject to sensitivity analyses.</p>				
19.25	Airspace Change	<p>Whilst the proposal to make simultaneous use of the northern runway will not require airspace change, realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process.</p> <p>Although the effect of these changes cannot currently be assessed as part of the DCO application, GAL should acknowledge this overall dependency in order not to mislead the public.</p>	ESCC	N/A	Please refer to Row 19.20 for details that respond to this issue.	N/A
19.26	Fleet Mix	<p>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case. However, this comment needs to be caveated by the confusion regarding which aircraft mix has actually been assessed as two different fleet mixes are presented in the PEIR.</p>	ESCC	N/A	<p>The fleet mix assumptions are fully set out in the Forecast Data Book (APP-075) at Table A1.3.1 and Annex 2. The implications of the range of fleet mix assumptions (the slower transition case to the central case) are tested in the Noise and Vibration Chapter of the ES (ES Chapter 6, particularly Section 14).</p>	<p>ES Appendix 4.3.1: Forecast Data Book [APP-075]</p> <p>ES Chapter 6: Approach to Environmental Assessment [APP-031]</p>
19.27	UK level assessment of the economic impact	<p>The evidence base relies heavily on the UK level assessment of the economic impact of the proposal in its Need Case, citing at para. 1.19 of the Overview Consultation Document that the benefits are greater than those assessed for Crossrail.</p>	ESCC	N/A	<p>The National Economic Impact Assessment includes an Annex which includes a sensitivity test that assumes slower passenger growth in the overall London system as a result of lower levels of demand.</p>	<p>Annex A1.4 of Needs Case: Appendix 1 – National Economic Impact Assessment [APP-251]</p>

		Whilst our analysis would suggest the assessment is generally technically robust, there may be areas where the assessment may have been under or over-stated. Nonetheless, a fundamental concern is in relation to the demand forecasts and the risk that demand growth may be slower than expected so impacting on the discounting of benefits, which could be overstated relative to the costs to some degree.					
19.28	Overflight maps	The overflight mapping is lacking in specific detail. Regarding the legend and the scale used for the overflight figures, a very broad range is used i.e. Orange represents 100-200 overflights. This is not a fine enough grain of detail for us to gain an understanding of how many additional overflights there will be with the NRP. To give a better indication of how overflight is expected to change, information should be provided for different months of the year. It should also show any difference between mid-week and weekend periods.	ESCC	N/A	<p>In response to comments on the PEIR the level of detail in the overflight mapping was improved for the ES by reducing the grid size from 3.6km to 1km. The area covered was maintained as a circular study area with a diameter of 70 miles centred at Gatwick Airport, see Section 2.2 of Environmental Statement - Appendix 14.9.2 Air Noise Modelling. A 6 point range is used to illustrate the pattern of overflights and how that might change. The exact changes in overflights expected re provided for the Chapter 9 Landscape Assessment Locations in Section 14.12 of ES Chapter 14: Noise and Vibration (APP-039).</p> <p>In addition to the overflight density maps Figure 14.9.30 is provided to give more detailed information on the areas that will be more overflown closer into the airport. As noted in Section 2.2 of Appendix 14.9.2 there is little guidance on how to present overflights statistically, so we chose the average summer day from 16 June to 15 September because this is the busiest period for Gatwick Airport and is the period used to assess noise impacts because it represents the worst case season.</p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p> <p>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</p>	
19.29	Overflight	This doesn't cover any areas of East Sussex – we would strongly suggest that this information is provided unless clarification can be provided as to whether the altitude of flights is above	ESCC	N/A	Overflights are mapped only below 7,000ft above local ground level as explained in Section 2.2 of Appendix 14.9.2. The grey area in Figure 14.6.7 shows where the number of Gatwick overflights in the 2019 baseline was below 1 a day, e.g. around	<p>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</p>	

		7,000ft by the time they fly over East Sussex			Eastbourne. Figures 14.6.8 and 14.6.9 show all overflights from all airports in 2019 and illustrates more than 1 overflight per day across the vast majority of East Sussex. Figure 14.6.18 shows the 2032 baseline total overflights against which those in 2032 with the NRP in Figure 14.9.31 can be compared.	Figures 14.6.7, 14.6.8, 14.6.9, 14.6.18, 14.9.31 contained in ES Noise and Vibration Figures – Parts 1 to 3 [APP-063 to APP-065]	
19.30	Development phasing	Tracker does not appear to have picked up or addressed our comments made on phasing of development.	TDC	N/A	The trackers have subsequently been updated to capture and respond to any outstanding issues. These tables set out the latest GAL position for each of the issues, including phasing of development.	N/A	
19.31	General Observation	The 4 spreadsheets comprising the Issues Tracker need to be amalgamated and have a set format that is consistent and easy to read/navigate.	TDC	N/A	GAL has consolidated the Issues Tracker spreadsheets into topic-based tables. GAL looks forward to engaging with the JLAs in developing the SoCG, having regard to the Issues Trackers and the Principal Areas of Disagreement Documents.	N/A	
19.32	General Observation	The issues in the tracker need to be marked relevant to the submissions made by each authority. Whilst some of our representations seem to be covered by points made by other authorities, we need to know that the representation that we made has been noted as relevant to us in order to carry this through to the SoCG.	TDC	N/A	The August 2022 (Tracker 1) compiled all comments by LPAs but we had our own internal spreadsheet which attributed comments to officers/lpa. At this point in time, they were all acting together and many comments would have been repetitious to include verbatim. As part of producing these tables, any new comments raised have been identified by each authority.	N/A	
19.33	General Observation	The tracker needs to be much more comprehensive rather than signpost to the ES documents. It needs to set out key dates of meetings and outcomes of those meetings to chart how/if the issue has been progressed and/or resolved. This will also help define the content of the PADSS.	TDC	N/A	It would not be practical to include the level of detail required to respond to the comments raised by the local authorities within the trackers. The ES has been prepared and submitted as part of the application to provide necessary detail on the application and therefore sign-posts are considered to be the most appropriate way of directing the LPAs to the information requested.	N/A	
19.34	General Observation	There should be a separate meeting and consensus on the final tracker form and scope of content.	TDC	N/A		N/A	

19.35	Balcombe Road	More detail needed on impact on Balcombe Road	SCC	N/A	The proposed works at Balcombe Road at set out at para 15.5.3 onwards in the Transport Assessment. Construction impacts will be managed in accordance with the oCTMP submitted as part of the application.	Transport Assessment [APP-258] ES Appendix 5.3.2: Code of Construction Practice , Annex 3 Outline Construction Traffic Management Plan [APP-085]	
19.36	Options appraisal/alternatives request	Request for information on options appraisal/alternatives considered promised in July TWG	SCC	N/A	Alternatives considered as part of the development of the Project are set out in ES Chapter 3.	Chapter 3: Alternatives Considered [APP-028]	
19.37	Construction compound plans	Construction compound plans referenced in session - request for information to be shared	SCC	N/A	Detailed on the proposed construction compounds and location are set out in ES Chapter 5 Project Description and Volume 5 of the Design and Access Statement, both of which form part of the application.	ES Chapter 5: Project Description [APP-030] Volume 5 of the Design and Access Statement [APP-256]	
19.38	Structures	A new ditch is noted at the N/W side of A23 Brighton Rd. We're not aware yet in the structure proposals for retaining walls along most of the length here, particularly to the north of the Mole River bridge where the embankment footprint doesn't seem large.	SCC	N/A	Drainage features associated with the highway works were developed in consultation with the local highway authorities and LLFA. Further development of the features will be undertaken during detailed design.	N/A	
19.39	Structures	The rail bridge works images show night-time works. Is night works proposed for some of the works affecting SCC roads (A23 & Balcombe Rd) to minimise daytime closures?	SCC	N/A	The illustration of rail bridge works is indicative of the need for a time-limited railway line possession, which may include night time working to minimise disruption to the Brighton Main Line. The widening of the Airport Way Railway Bridge over Brighton Main Line will not impact the A23 or Balcombe Road. Our indicative methodology assumes all the beams will be transported through M23 J9, M23 Spur and Airport Way. The Beam installation (2no) and the deck construction will impact Network Rail Brighton Main Line,	Paragraph 7.3.63 of ES Appendix 5.3.1: Buildability Report – Part B – Part 1 [APP-080]	

					and these works were assumed to be done during weekend closures.		
19.40	Structures	A23 temporary panel bridge. This will need to be suitable for STGO vehicles as this does serve as a primary route into Horley.	SCC	N/A	<p>The indicative proposals for temporary works associated with the A23 London Road bridge have been developed to maintain access and optimise capacity into and out of Horley.</p> <p>The indicative construction methodology requires a temporary panel bridge during the A23 London Road Bridge replacement. The design requirements for these temporary panel bridge will be agreed with Local Highway Authorities and National Highways during the detailed design and preconstruction stage.</p>	Paragraph 7.3.76 of ES Appendix 5.3.1: Buildability Report – Part B – Part 1 [APP-080]	
19.41	Lighting Strategy	Lighting Strategy needs to be shared. Just became available with DCO publication.	RBBC	N/A	Full details of the lighting strategy are available in ES Appendix 5.2.2 Operational Lighting Framework.	ES Appendix 5.2.2: Operational Lighting Framework [APP-077] Design Principles in Volume 5 of the Design and Access Statement [APP-256]	
19.42	Car Park B	Not clear if Car Park B is compensation for land take in Church Meadows and along Riverside Gardens and whether acceptable to RBBC.	RBBC	N/A	<p>The Project would lead to the permanent loss of approximately 1.03ha of land within Riverside Garden Park. Replacement areas of approximately 1.43ha of open space would be provided in the areas of Car Park B that lie immediately to the south of the Park and the replacement areas would be linked to Riverside Garden Park via a new pedestrian link.</p> <p>The Project would also lead to the permanent loss of approximately 0.13ha of land in Church Meadows. A replacement area of approximately 0.52h of open space would be provided to the west of the Church Meadows, linked to the existing area of open space by a new pedestrian bridge over the River Mole.</p>	Para 19.9.39 onwards of ES Chapter 19: Agricultural Land Use and Recreation [APP-044]	

19.43	Maximum design scenarios	LTV.05.01 On maximum design scenarios this is not agreed. We are still waiting for the final detailed road layouts, noise and light mitigation measures. On the Care facility, whilst we appreciate this is evolving, the location and height of chimney are still to be agreed.	RBBC	N/A	<p>The Preliminary Design road layouts were discussed during Topic Working Groups prior to DCO submission and are presented in the DCO documents.</p> <p>Final detailed road details will be developed post consent in line with the requirements set out in the Schedule 2 Requirements.</p>	<p>Surface Access Highways Plans – General Arrangements [APP-076]</p> <p>Surface Access Highways Plans – Engineering Section Drawings [APP-077]</p> <p>Surface Access Highways Plans – Structure Section Drawings [APP-078]</p>	
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Table 20: Local Authority Comments on Draft DCO and Explanatory Memorandum

Reference	Provision	Local authority comment	Source	GAL Response as of October 2023	Signposting to DCO Application	Signposting to SoCG
20.1	Article 2 (Interpretation)	<p>The definition of “commence” includes 16 exceptions to the meaning of “commence” (i.e., those listed (a) to (p)) which are wider than those included in the cited precedents. It is not clear from the EM why more carve outs to the definition are required for this project as no justification for the inclusion of any of (a) to (p) is provided in the EM.</p> <p>Moreover, certain of the exceptions would seem capable of potentially giving rise to significant environmental effects e.g. (k) receipt and erection of construction plant and equipment; (l) erection of temporary buildings and structures (m) site preparation and site clearance (n) establishment of construction compounds and (o) establishment of temporary haul roads and should include definitions with regard to permits.</p> <p>Paragraph 3.4.1 of the EM states –</p> <p>The works that are excluded from the definition do not give rise to any materially new or materially different environmental effects to those assessed in the ES, being either de minimis or have minimal potential for adverse effects, in line with the Inspectorate’s Advice Note 15”.</p> <p>The Local Authorities would therefore expect GAL to set out:</p> <ul style="list-style-type: none"> (i) where each of these exceptions is assessed in the ES and (ii) provide a copy of its pre-commencement plan. (For instance, the Councils would wish to know how temporary haul roads, which fall within the exceptions, would be controlled; similarly, the Councils would wish to know about the proposed size, scale, and duration of the erection of any temporary buildings and structures). <p>Once further information is known, the Councils might wish to seek to control these activities listed in (a) to (p) by requirement.</p> <p>Regarding temporary works, it is not clear how these will be dealt with when they are no longer needed, and we would expect a requirement to deal with this.</p>	JLAs	<p>The drafting of the definition of "commence" has advanced since the version commented upon. There are now 15 exceptions at sub-paragraphs (a) to (o) of article 2(1).</p> <p>These exceptions are all preceded by at least one of the Sizewell C (article 2), Manston Airport (article 2) or M25 J28 (article 2) DCOs or align with emerging drafting submitted in the Luton Airport Expansion application (Schedule 2, Part 1). The only additional provision is sub-paragraph (n) (establishment of temporary haul roads), which has been included as a separate limb for clarity, though the stated activity falls within the scope of other more generally worded exceptions from "commencement" in precedent DCOs (e.g. 'construction of temporary structures').</p> <p>As per paragraph 3.4.1 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006] ("ExM"), it is reasonable and proportionate to include the specified exceptions to enable the efficient use of time in the construction timetable prior to the triggering of "commencement" under the DCO. All pre-commencement activities will be subject to the Code of Construction Practice and its associated management plans (see requirement 7) and must be carried out in accordance with the Carbon Action Plan (see requirement 21).</p> <p>The activities specified in this definition were selected to accord with precedent and as activities which can be (and, in many cases, must be) carried out early in the construction timetable. As per the ExM, the activities do not give rise to materially new or materially different environmental effects to those assessed in the ES.</p> <p>The ES assesses the environmental impacts from preparatory and construction activities for the project, and the activities captured by the exceptions to the definition of "commence" have been assessed as part of this exercise. However, given that the exceptions are categories of activities which form part of the wider preparatory and construction works timetable, there are not specific passages of the ES which can be cited in respect of each individual exception. Certain of the pre-commencement activities which can be identified with particular certainty at this stage are</p>	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraph 3.4.1 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p> <p>Paragraph 5.3.8 onwards of ES Chapter 5 Project Description [APP-030]</p>	

		<p>Ref. No. 36 of the Meeting Note states –</p> <p>“Interpretation of “commence”. The Applicant has included a number of operations in (a) to (p) that would be excluded from the definition of commence but which have the potential to give rise to environmental effects. The Applicant may wish to review this list”.</p> <p>The Authorities agree with this comment and, as well as reviewing the list, we would hope GAL provides an explanation for the inclusion of each exception. This is consistent with the regulation 5(2)(c) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (“APFP”) which states a DCO application “must be accompanied by ... an explanatory memorandum explaining the purpose and effect of provisions in the draft order, including in particular any divergences from the model provisions”, which is amplified by the advice given in paragraph 2.26 of PINS Advice note thirteen: Preparation of a draft order granting development consent and explanatory memorandum –</p> <p>“The draft order must be accompanied by an explanatory memorandum (Regulation 5(2)(c) APFP) explaining the purpose and effect of each provision in a draft order (explaining, for example, why it is considered necessary)”.</p>		described from Paragraph 5.3.8 of ES Chapter 5: Project Description [APP-030].		
20.2	Article 2 (Interpretation)	<p>The definition of “maintain” sets out a non-exclusive list of 9 actions which are considered “maintenance” for the purposes of the Order. These actions should not give rise to any materially new or materially different environmental effects to those identified in the ES and this should be explained in the Explanatory memorandum for the Authorities to be able to consider whether any of the proposed actions give rise to any concern.</p> <p>‘Ancillary structures’ defined in article 2 aren’t further clarified but the construction of these allows vertical and lateral deviation (to an extent not yet known)</p>	JLAs	<p><u>“Maintain”</u></p> <p>The definition of "maintain" expressly states that activities will only constitute "maintenance" <u>to the extent</u> that they do not give rise to any materially new or materially different environmental effects from those identified in the environmental statement. GAL trusts that this addresses the Councils' concern.</p> <p>Further, the wording of this definition is well-established in precedent including the Sizewell C, Manston Airport and M25 J28 DCOs (article 2(1) of each).</p> <p><u>“Ancillary structures”</u></p> <p>This definition is no longer used in the latest draft of the DCO.</p>	Draft Development Consent Order [AS-004]	
20.3	Art.3 (development consent etc. granted by	<p>Art. 3(1) states –</p> <p>“Subject to the provisions of this Order including the requirements in Schedule 2 (requirements), the undertaker is granted development</p>	JLAs	<p>Several precedent DCOs contain a separate article authorising the operation and use of the authorised development – see, for example, article 7 of the Sizewell C DCO: <i>“The undertaker is authorised to operate and use the authorised development for which development consent is granted by this Order.”</i></p>	Draft Development Consent Order [AS-004]	

	Order)	consent to <u>construct, operate and use</u> the authorised development”. [Emphasis added]. The corresponding provision used in other DCO's is usually “... the undertaker is granted development consent <u>for</u> the authorised development ...”. It would be helpful to know why these words have been chosen instead of that usually used.		In drafting article 3 of the draft DCO, it was considered that it was clearer and more succinct to subsume the separate authorisation of operation and use into a single provision in article 3.		
20.4	Art.6 (limits of deviation)	This article appears incomplete and cannot be understood until the Work No. is included in art.6(2), the number of the relevant requirement included in art.6(3), and the maximum vertical level of deviation is included in art.6(4). Since art.6(4) concerns constructing highway works, highway authorities will be particularly interested in this provision to agree dimensions in terms of metres included in relevant sections. Ref. No. 39 of the Meeting Note states – “The Applicant may wish to further consider the drafting of this Article, and in particular 6(2) and 6(4)”. In addition, as mentioned above, the drafting of art.6(3) needs to be considered including the defining of ancillary structures.	JLAs	The drafting of article 6 has advanced since the version commented on by the Councils and is now complete. As above, no definition of "ancillary structures" is used in the latest draft DCO.	Draft Development Consent Order [AS-004]	
20.5	Art. 7 (benefit of Order)	Art.7(1) states – “Subject to article 8 ... the provisions of this Order conferring powers on the undertaker have effect solely for the benefit of Gatwick Airport Limited save for the highway works in respect of which the provisions of this Order have effect for the benefit of Gatwick Airport Limited and National Highways”. It is considered art.7(1) would be clearer if the underlined words were amended to cross-refer to numbered works	JLAs	The drafting of article 7 has advanced since the version commented on by the Councils. The full benefit of the Order is now conferred on the undertaker, subject to any transfer of the benefit pursuant to article 8.	Draft Development Consent Order [AS-004]	
20.6	Art. 8 (consent to transfer benefit of order)	The consent of the Secretary of State is required for a transfer or grant of the benefit of the Order, except where it is made to certain bodies (statutory undertakers, Network Rail, local highway authorities) each of which is set out in square brackets in art.8(4)(a) to (c), suggesting the final list is of exceptions is unconfirmed. If “local highway authorities” are to remain in art.8(4)(c), we expect that provision will eventually include a cross-reference to certain numbered works or will include a description of the works which will not require the Secretary of State’s consent. The EM does not provide additional information on this point.	JLAs	The drafting of article 8 has advanced since the version commented on by the Councils. The Secretary of State’s consent is not required for the transfer or grant of the benefit under the Order in respect of: <ul style="list-style-type: none"> • "any works within a highway" to the relevant highway authority; or • specified work numbers (being the new office areas, new hangar and hotels) to a registered company. <p>The former carve-out is justified on the basis that the relevant highway authorities will operate the highways, as altered pursuant to the authority granted in the DCO. It is noted that this form of</p>	Draft Development Consent Order [AS-004]	

				<p>drafting has also been adopted in the emerging draft Luton Airport Expansion DCO (article 8).</p> <p>The latter carve-out is justified on the basis that registered companies other than GAL will operate and use these parts of the proposed development once construction is complete.</p>		
20.7	Art 9. (planning permission)	<p>Conditions of previously granted planning permission that are incompatible...shall cease to have effect. Is there precedent for this?</p> <p>(1) Operational land – need clarification of what this means in practice and the implications of such an article.</p> <p>(2) And (3) Clarification of what is stated with regard to the actions that could be taken prior to the commencement of the order.</p> <p>(4) What does 'incompatible' mean in the context of the dDCO?</p> <p>(9) The Authorities believe there needs to be discussion regarding permitted development rights in relation to the NRP proposals</p>	JLAs	<p>Please refer to paragraphs 4.24 – 4.28 of the ExM, which explains the rationale for article 9 in light of the recent Supreme Court decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority</i> [2022] UKSC 30. Other recently submitted DCO applications make similar provision, including the draft Luton Airport Expansion DCO (article 45) and Lower Thames Crossing DCO (article 56).</p> <p>As regards the cited wording which disapplies incompatible conditions of previously granted planning permissions, similar wording features in article 45(2)(c) of the draft Luton Airport Expansion DCO.</p> <p>In response to the further queries:</p> <ol style="list-style-type: none"> 1) The drafting at article 9(1) of the draft DCO is a model provision (article 36) which is well-established in numerous precedent DCOs. The drafting is by reference to section 264 of the Town and Country Planning Act 1990 ("TCPA 1990") and the effect is to ensure that permitted development rights attaching to the undertaker in relation to operational land have effect as they would do if planning permission had been granted for the authorised development. "Operational land" is defined in section 263 TCPA 1990. 2) Sub-paragraphs (2) and (3) address legal risk arising from the <i>Hillside</i> decision and ensure that (i) the authorised development can continue to be carried out notwithstanding an incompatible planning permission and (ii) planning permissions granted and initiated prior to commencement of the authorised development under the DCO can continue to be lawfully implemented thereafter. Whether activities authorised by the DCO are taking place pre- or post-commencement do not affect these principles. 3) As above. 4) 'Incompatibility' is as discussed in the <i>Hillside</i> decision. A planning permission would be 'incompatible' with the development authorised by the DCO if it were physically 	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraphs 4.24 – 4.28 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p>	

				<p>impossible to build out both developments (e.g. due to overlapping consented structures).</p> <p>5) There is no sub-paragraph (9) in article 9 of the current draft DCO and it is presumed that this point is in reference to sub-paragraphs (5) and (6) of the present drafting. These make clear that the DCO does not restrict the future exercise by the undertaker of permitted development rights. This is necessary to ensure that GAL as airport operator can continue to rely on its extant permitted development rights to facilitate the ongoing operation of the airport and allow for minor works to be separately consented without needing to rely on an amendment to the Order, which would be disproportionate and impractical.</p>		
20.8	Art. 10 (application of the 1991 Act)	<p>It is not clear which article is being cross-referred to in art.10(4). (Art.10(4) refers to “article [] (temporary stopping up and restriction of use of streets)” but there is no such article. (Art. 12 concerns power to alter layout, etc., of streets, art.13 to stopping up of streets, and art. 14 to temporary closure of streets) and in ‘application of the permit schemes. The EM does not provide an explanation with no reference to the application of permit schemes.</p> <p>The disapplications in 10(3) are broad and the highway authorities disagree with the inclusions of 74A, 73B, 73C, 77 and 78A which should all apply to the works under the provisions of the DCO.</p>	JLAs	<p>The drafting of article 10 has advanced since the version commented on by the Councils and the cross-references are now complete. The latest draft no longer refers to “permit schemes”.</p> <p>Section 74A of the 1991 Act is no longer disapplied in the latest draft of the DCO. Sections 73B, 73C and 78A of the 1991 Act are disapplied in several precedent DCOs, including the Sizewell C (article 15), Manston Airport (article 10), A303 (Amesbury to Berwick Down) (article 8) and A417 Missing Link (article 12) DCOs. Section 77 of the 1991 Act is disapplied in the Sizewell C DCO (article 15).</p> <p>GAL invites the Councils to please specify the precise nature of their concern with the disapplication of these provisions and why the approach here should depart from the precedent outlined.</p>	Draft Development Consent Order [AS-004]	
20.9	Art. 11 (street works)	<p>This Article allows the undertaker to interfere with and execute works in or under the streets within the Order limits for the purposes of the authorised development. It departs from most precedents by authorising interference with any street within the Order limits, rather than just those specified in a schedule. This is a significant departure from established precedent (and the Model Provisions).</p> <p>WSSC is therefore concerned with the drafting, and would request GAL amend art.11(1) so that affected streets are specified in a schedule. Its addition, it is requested that article 11(1) be amended as follows – “<i>The undertaker may, for the purposes of the authorised development and subject to the consent of the street authority, enter on so much of any of the streets as are within the</i></p>	JLAs	<p>Article 11 is by reference to streets “within the Order limits” rather than a specified list of streets because (i) there are only a small number of streets within the Order limits and there is little benefit therefore in listing them in a schedule and (ii) GAL foresees a need for flexibility as regards the streets under which it may need to carry out works, particularly in relation to necessary utility diversions which may become apparent during construction.</p> <p>Further, such an approach is precedent in several DCOs, including the A38 Derby Junctions (article 11), A47 Wansford to Sutton (article 15), A57 Link Roads (article 10) and Thurrock Flexible Generation Plant (article 11) DCOs.</p>	Draft Development Consent Order [AS-004]	

		<p><i>Order limits and may ...</i>. [Proposed amendment shown bold and underlined].</p> <p>We note the power to “enter onto and alter the layout of, or carry out any works on, any street within the Order limits” under art.12(1) (power to alter layout, etc., of streets) is subject to GAL obtaining the street authority’s consent, so the principle of our proposed amendment to art.11(1) appears already elsewhere in the dDCO.</p>		<p>The additional wording proposed in bold is not included in any of these precedent DCOs. Its inclusion would be a departure from well-established precedent and therefore unjustified.</p> <p>The approach in the draft DCO, that article 11 does not require the consent of the street authority while article 12 does, is precedent in the Sizewell C DCO (see articles 13 and 14). The works envisaged by article 12, which extend inter alia to permanently altering the nature and characteristics of streets, are of greater consequence to the ongoing use of the streets in question than the more limited works envisaged by article 11, which are largely in or under the streets. There is therefore good reason why the street authority’s consent should be required for works under article 12 and not article 11.</p>		
20.10	Art. 13 (stopping up of streets)	<p>We consider art.13(2)(b) should be amended as follows –</p> <p>“(2) No street specified in columns (1) and (2) of Part 1 of Schedule [] (streets for which a substitute is to be provided) is to be wholly or partly stopped up under this article unless—</p> <p>... (b) a temporary alternative route for the passage of such traffic as could have used the street to be stopped up is first provided and subsequently maintained by the undertaker <u>to the reasonable satisfaction of the relevant street authority</u> between the commencement and termination points for the stopping up of the street until the completion and opening of the new street in accordance with sub-paragraph (a)”. [Proposed amendment shown bold and underlined]</p>	JLAs	GAL is content to add this wording to article 13.	N/A	
20.11	Art. 14 (Temporary closure of streets)	<p>While this article is precedent in other DCOs, we would expect the following paragraph to be included after existing paragraph (5) –</p> <p>“(X) No street specified in column (2) of Part 2 of Schedule [] (Streets to be temporarily closed) may be wholly or partly closed under this article unless— (a) the new temporary street to be substituted for it, which is specified in column [] of that Part of that Schedule, is open for use, and has been completed to the reasonable satisfaction of the street authority; or (b) an alternative temporary route for the passage of such traffic as could have used the street to be temporarily closed between the commencement and termination points for the temporary closure of the street is first provided and is subsequently maintained by the undertaker to the reasonable satisfaction of the street authority until the opening of</p>	JLAs	<p>The drafting of article 14 has advanced since the version commented on by the Councils.</p> <p><u>New sub-paragraph after sub-paragraph (5)</u></p> <p>The additional wording proposed to be included after existing sub-paragraph (5) is not considered necessary. Sub-paragraph (4) already provides that: "The undertaker must not temporarily alter, divert, prohibit the use of or restrict the use of any street without the consent of the street authority, which may attach reasonable conditions to any</p> <p>consent but such consent must not be unreasonably withheld or delayed". Should the street authority wish to request an alternative route to the temporarily altered/diverted/restricted etc. street be</p>	Draft Development Consent Order [AS-004]	

		<p>the new temporary street in accordance with sub-paragraph (a) or the re-opening of the street temporarily closed</p> <p>To ensure like-for-like is provided, we would request existing paragraph (6) is amended as follows – “(6) Where the undertaker provides a temporary diversion under paragraph (4), the new or temporary alternative route is not required to be of a higher standard, <u>and must not be of a lower standard</u>, than the temporarily closed street in column (2) of Part of Schedule []”.</p> <p>[Proposed amendment shown bold and underlined].</p> <p>WSCC/SCC object to the inclusion of a deeming provision within 28 days (paragraph 9).</p>		<p>provided, it can do so as a condition to its consent (provided that such a condition is reasonable in the circumstances).</p> <p>Materially similar formulations of article 14 (without the additional proposed wording) were included in precedent DCOs including the M25 Junction 10/A3 Wisley Interchange (article 14) and A38 Derby Junctions (article 15) DCOs. It is also noted that a similar approach has been taken in the emergingdraft Luton Airport Expansion DCO (article 13).</p> <p><u>"Must not be of a lower standard"</u></p> <p>The further proposed amendment in bold to what is now sub-paragraph (5) ("and must not be of a lower standard") is not justified. Where a street is being temporarily altered, diverted or restricted (etc.), it is not reasonable to require that the temporary diversion be of the same standard as the main permanent route. Indeed, this is unlikely to be the case.</p> <p><u>Deeming provision</u></p> <p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p>		
20.12	Art. 15 (public Rights of Way-creation, diversion and stopping up)	<p>The space in art.15(1) for the cross-reference to the relevant schedule is blank.</p> <p>Paragraph 5.35.1 of the EM is meant to set out the explanation for the footpaths which are proposed to be permanently stopped up for which no substitute is to be provided; however, no explanation is provided. We assume an explanation will be provided in the next version of the EM; however, we request that the explanation is provided as soon as possible.</p>	JLAs	<p>The drafting of article 15 has advanced since the version commented on by the Councils and is now complete.</p> <p>The explanation for the single length of footpath proposed to be permanently stopped up for which no substitute is provided is included in ES Chapter 19: Agricultural Land Use and Recreation [APP-044] and ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]. In summary, this portion of footpath would remain as part of the promoted Sussex Border Path but the classification as a 'footpath' would be removed and</p>	<p>Draft Development Consent Order [AS-004]</p> <p>ES Chapter 19: Agricultural Land Use and Recreation [APP-044]</p> <p>ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]</p>	

				replaced by the shared use active travel cyclist and pedestrian route along this section of highway.		
20.13	Art. 16 (Access to Works)	As above, WSCC object to the deeming provision, as it is necessary to seek our consent and, if needs be, we could have a clause setting out that we would not unreasonably withhold our consent.	JLAs	<p>Please see GAL's comments in Row 20.11 in relation to deeming provisions.</p> <p>In any event, the drafting of article 16 has advanced since the version commented on by the Councils and no longer contains a deeming provision.</p>	Draft Development Consent Order [AS-004]	
20.14	Art. 18 (Traffic Regulation)	WSCC object to the deeming provision within 28 days	JLAs	Please see GAL's comments in Row 20.11 in relation to deeming provisions. The period is now 56 days.	Draft Development Consent Order [AS-004]	
20.15	Art 18A (construction and maintenance of local highway works)	There is no explanation of this provision in the EM and one needs to be included	JLAs	The drafting of this Part of the DCO has advanced since the version commented on by the Councils. This article is now article 20 and paragraphs 5.56 – 5.58 of the ExM contain an explanation for this article.	Draft Development Consent Order [AS-004] Paragraphs 5.56 – 5.58 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]	
20.16	Art 19. (agreement with highways authorities)	WSCC would encourage GAL to agree, with the Highway Authorities, template Highways Agreements under Section 278 and 38 of the Highways Act 1980 as early as possible.	JLAs	Noted.	N/A	
20.17	Art.22 (authority to survey and investigate land)	<p>Art.22 authorises the undertaker to enter onto any land within the Order limits or which may be affected by the authorised development to undertake various survey and investigative works. The list of works which may be undertaken under art.22(1)(b) are (slightly) more extensive than those undertaken under the corresponding provision of the precedents (Sizewell and M25 DCOs) and the EM does not explain why.</p> <p>Art.22(6) includes a 28-day deeming provision.</p> <p>As mentioned elsewhere, the Highway Authorities object to the inclusion of a deeming provision.</p>	JLAs	<p>The list of works in this article (now article 24) materially aligns with precedent in the A38 Derby Junctions (article 22), A417 Missing Link (article 23) and A57 Link Roads (article 21) DCOs. It is also noted that a similar approach has been taken in the emerging draft Luton Airport DCO (article 21) . The listed of works is reasonable and proportionate and does not materially go beyond established precedent.</p> <p>Please see GAL's comments in line 11 in relation to deeming provisions. The period is now 56 days.</p>	Draft Development Consent Order [AS-004]	
20.18	Art.23 (felling or lopping of trees and removal of hedgerows)	<p>Hedgerow works are excluded from the definition of "commencement" (art.2), but this article controls hedgerow works so further explanation is needed as to how they work together, particularly given the possibly wide-ranging exclusion under art.2 ("removal of hedgerows, trees and shrubs").</p> <p>Art.23(4) says –</p>	JLAs	<p>While "removal of hedgerows, trees and shrubs" is excluded from the definition of "commence" in article 2 as noted, the present article (now article 25) will still govern how these activities are carried out, article 25 providing the underlying authority for these activities.</p> <p>The wording relating to "important hedgerows" has been removed from the latest draft of article 25, following confirmation that no</p>	Draft Development Consent Order [AS-004]	

		<p>“(4) The undertaker may, for the purposes of carrying out the authorised development but subject to paragraph (2), remove any hedgerow [which includes important hedgerows] within the Order limits that is required to be removed”.</p> <p>We would expect important hedgerows which are to be removed to be identified on a plan. The Sizewell DCO included such a provision (art.81(4)(b)).</p> <p>23.(7) A ‘hedgerow’ is not defined in The Hedgerows Regulations 1997 and therefore has little context/definition in this sentence. Recommend ‘hedgerow’ is defined further either in this order or as referred to elsewhere (example: a row of woody bushes or trees, usually less than 5m wide at the base, often along the boundary of a garden, field or road).</p> <p>Amendments recommended to this section:</p> <p>23.—(1) The undertaker may fell or lop any tree or shrub within or overhanging land within the Order limits, or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub—</p> <p>(a) from obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; or from constituting an imminent danger to persons using the authorised development, or property within the authorised development.</p> <p>(2) In carrying out any activity authorised by paragraph (1), the undertaker must-</p> <p>(a) carry out all tree and hedge works in accordance with British Standard 3998:2010 Tree work – Recommendations (or the most recent industry best practice); and</p> <p>(b) do no unnecessary damage to any tree, hedge or shrub by carrying out the minimum works required; and</p> <p>(c) must pay compensation to any person for any loss or damage arising from such activity.</p> <p>(3) This article does not permit the felling or lopping of trees or shrubs, or the removal of hedgerows, without first obtaining necessary consents from relative bodies where—</p> <p>(a) the felling, lopping or removal works are not required to construct the authorised development; and</p> <p>(b) legally protected species inhabit the tree, shrub or hedge to be worked on [insert relevant acts if required]; or</p> <p>(c) a felling licence would usually be required; or</p> <p>(d) a tree preservation order exists.</p> <p>(4) Any dispute as to a person’s entitlement to compensation under paragraph (2), or as to the amount of compensation, is to be determined under Part 1 of the 1961 Act.</p>		<p>such hedgerows are anticipated to be affected by the proposed development.</p> <p>Defining "hedgerow" by reference to the Hedgerow Regulations 1997 is well-established in many DCO precedents, including the Sizewell C (article 81), Southampton to London Pipeline (article 42) and Manston Airport (article 34) DCOs. Including a bespoke definition would be a significant departure from precedent and is not considered to be justified.</p> <p>The drafting of article 25 has advanced since the version commented upon by the Councils. For example, article 25(1)(b) now includes "<i>or property within the authorised development</i>". GAL will carefully consider the other proposed additions and will include them in the next draft of the DCO where reasonable and justified. It is not anticipated that there will be any concerns with tree and hedge works needing to be carried out in accordance with BS 3998:2010 (or more recent industry best practice).</p> <p>By way of initial comment on the remaining suggested additions, the new proposed sub-paragraph (3) does not appear necessary because:</p> <ul style="list-style-type: none"> • it is unclear what is meant by "<i>relative bodies</i>"; • (3)(a) is not needed because authority is only conferred on the undertaker to fell or lop in the circumstances specified in sub-paragraphs (1)(a) and (b); • (3)(b) is not needed because the DCO will not obviate the need for consents required for protected species or laws related thereto; • (3)(c) is not needed because the draft DCO does not contain drafting obviating the need to obtain a felling licence and such a licence would therefore be required prior to felling; and • (3)(d) is not needed because the existence and protection afforded by tree preservation orders is not disturbed by the DCO (in the absence of express provision). 		
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		<p>(5) The undertaker may, for the purposes of carrying out the authorised development but subject to paragraph (2), remove any hedgerow within the Order limits that is required to be removed.</p> <p>(6) The powers conferred by paragraphs (1) and (5) remove any obligation upon the undertaker to secure any consent under the Hedgerow Regulations 1997(a) in undertaking works pursuant to paragraphs 1 or 5.</p> <p>In this article “hedgerow” has the same meaning as in the Hedgerow Regulations 1997(1) and includes important hedgerows.</p>				
20.19	Art.25 (compulsory acquisition of land)	<p>Art.25(1)(a) refers to land being required “for the authorised development”. This wording is found in the Manston DCO.</p> <p>The Sizewell DCO says that land must be required “for the construction, operation or maintenance of the authorised development”. This seems more restrictive as it is clear what the land needs to be used for; the formulation is consistent with that used in art.3, as mentioned above.</p> <p>Art. 25(2): in the list of ‘subject to’ provisions, the authorities note that the cross-references are all blank and, while the titles of the cross-referred provisions seem correct, we would expect such provisions the article will need to be checked carefully once updated and at this stage the authorities cannot comment until further details are made available.</p>	JLAs	<p>It is not apparent that there is a material difference between these forms of drafting, but GAL is happy to adopt the proposed formulation.</p> <p>The drafting of this article (now article 27) has advanced since the version commented on by the Councils and is now complete.</p>	Draft Development Consent Order [AS-004]	
20.20	Art. 26 (compulsory acquisition of rights and imposition of restrictive covenants)	<p>It is not clear from the EM why this approach has been taken; moreover, not all relevant schedules have been completed and so it is not possible to review these.</p> <p>Art.28(3) and (4) of the M25 DCO includes a specific provision that the power to impose restrictive covenants can only be exercised in respect of certain plots and we query if the same restriction should apply here.</p>	JLAs	<p>Paragraphs 7.4 – 7.10 of the ExM explain why this article (now article 28) is required and justified.</p> <p>The provisions of the M25 J10 and M25 J28 DCOs are noted. However, it is not considered appropriate to adopt similar wording here. In the draft DCO protection is conferred on specified plots by virtue of sub-paragraph (2), which limits the rights the undertaker can compulsorily acquire over those plots. In respect of other plots within the Order limits, it should be open to the undertaker to choose to impose a restrictive covenant rather than acquire the plot outright, this being a lesser right which may be more proportionate to the need in question.</p> <p>The approach adopted in the draft DCO is precedented in, <i>inter alia</i>, the Sizewell C DCO (article 32).</p>	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraphs 7.4 – 7.10 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p>	
20.21	Art. 29 (time limit for exercise of authority to	<p>No time limit has been included in art.29(1) yet but elsewhere there are references to 10 years. We would need to see justification from GAL as to why 10 years rather than the normal 5 years, particularly given that normally the period does not run from the date of the</p>	JLAs	<p>The drafting of this article (now article 31) has advanced since the version commented on by the Councils. A time period of ten years has been included, as justified in paragraphs 7.18 – 7.20 of the ExM. This is precedented as described in the ExM and it is further</p>	Draft Development Consent Order [AS-004]	

	acquire land compulsorily)	Order but from the 'start date' (art. 29(2)) which excludes the period for legal challenge and the time for the determination of a challenge.		noted that the same approach has been taken in the emerging draft Luton Airport Expansion DCO (article 26).	Paragraphs 7.18 – 7.20 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]	
20.22	Art. 32 (application of the 1981 Act and medication of the 2017 Regulations)	Art.32(16) to (19) seeks to amend the Compulsory Purchase of Land (Vesting Declarations) (England) Regulation 2017. The Authorities note that similar amendments have recently been sought in dDCOs and omitted by the Secretary of State (including, coincidentally, in the M25 DCO where the Secretary of State said at para 141: "... the Secretary of State has made the following modifications to the draft DCO ... article 32 (modification of the 2017 Regulations) has been removed as it is unprecedented and there is a lack of justification as to why needed in this matter").	JLAs	<p>These comments are noted and will be considered by GAL in light of the cited decision of the Secretary of State.</p> <p>However, by way of preliminary comment, the modifications effected by these paragraphs ensure that the interests and rights in land which are intended to benefit a third party, such as a statutory undertaker whose apparatus may be re-located in order to construct the authorised development, will vest in that third party instead of the undertaker, which would otherwise be the acquiring authority in respect of those interests and rights. This is considered necessary and justified to ensure the efficient operation of compulsory acquisition for the project involving third parties.</p>	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraph 7.29 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p>	
20.23	Art. 35 (temporary use of land for carrying out the authorised development)	<p>The Authorities are of the view that Art.35(1)(d): includes the right for the undertaker to construct permanent works even though this relates to temporary land is unreasonable and should be excluded.</p> <p>Similarly, Art.35(1)(e): includes a right for the undertaker to construct mitigation works for the authorised development. This seems wide ranging and uncertain and should also be excluded.</p> <p>Art.35(4): In accordance with the PINS Ref No.44 states: "The Applicant may wish to explain its reasoning regarding the exemptions that are sought in 30(sic)(4)(a) to (f)". We cannot see an explanation in the EM.</p>	JLAs	<p><u>Permanent works</u></p> <p>Article 37(1)(d) (as now numbered) is materially preceded in the Sizewell C DCO (article 39). Further, many precedent DCOs (including the Boston Alternative Energy Facility (article 33) and A57 Link Roads (article 31) DCOs) authorise the undertaker to "construct any works on that land as are mentioned in Schedule 1 (authorised development)", the majority of which in most DCOs will be permanent works. The principle of constructing permanent works using temporary use powers is therefore well-established.</p> <p><u>Mitigation works</u></p> <p>The right to construct mitigation works in article 37(1)(e) (as now numbered) is also preceded in the Sizewell C DCO (article 39). Such a power is reasonable and justified in order to allow the undertaker to enter onto land to carry out mitigation works to address identified environmental impacts. Can the Councils please further detail the nature of their concern with this provision?</p> <p><u>Exemptions</u></p> <p>The exemptions in sub-paragraphs (4)(a) – (f) are necessary and reasonable to ensure that the undertaker is not required to restore temporarily possessed land to the extent that this restoration</p>	Draft Development Consent Order [AS-004]	

				would undo the works for which the land was possessed in the first place. It would negate the purpose of the article as a whole, which authorises certain types of works to be carried out, if the exclusions were not present and these works had to be reinstated prior to handing back the land.		
20.24	Art.36 (time limit for exercise of authority to temporarily use land for carrying out the authorised development)	Art.36(1): the time limit is currently unknown so we cannot comment on it yet.	JLAs	The time limit in this article (now article 38) has now been specified as ten years, to accord with the time limit in article 31 (discussed in Row 20.21 above).	Draft Development Consent Order [AS-004]	
20.25	Art.37 (temporary use of land for maintaining the authorised development)	By art.37(3), a notice period of 28 days must be given before the undertaker enters on and takes possession of land under art.37. Similar DCO's have set out a period for up to 3 months. The Authorities believe GAL should include a longer notice period than currently proposed and that a 3-month period would be considered more appropriate.	JLAs	In the latest draft of this article (now article 39), the notice period is 14 days. However, GAL is willing to amend this to 28 days, to reflect the weight of precedent DCOs to this effect, including the Manston Airport (article 30), A38 Derby Junctions (article 34), A303 (Amesbury to Berwick Down) (article 30) and Longfield Solar (article 28) DCOs. Any longer time period is not justified.	Draft Development Consent Order [AS-004]	
20.26	Article 44 (disapplication of legislative provisions)	(b) LLFA input needed – disapplication of various provisions of the Land Drainage Act 1991. Also, I can't see any Protective Provisions for the Drainage Authority – these would be required if agreement to disapplication of s23 LDA 1991 was going to be agreed. 44(3) authorities would wish to review how this would apply to ancillary uses.	JLAs	Noted. The need for any protective provisions will be discussed with the LLFA and updates provided where necessary.	Draft Development Consent Order [AS-004]	
20.27	Art.49 (certification of documents etc.)	A drafting point: not all the documents which are set out in Schedule 14 (documents to be certified) are identified as documents to be certified in article 2; similarly, not all of the documents mentioned in article 2 are listed in Schedule 14.	JLAs	These provisions have advanced since the version commented on by the Councils and are now as intended.	Draft Development Consent Order [AS-004]	
20.28	Schedule 1 (authorised development)	The highway works set out in schedule 1 (pages 45-47) are clearly still to be agreed and there is a need for additional work to address all matters and comments already provided by the Highway Authority.	JLAs	This schedule has now been finalised.	Draft Development Consent Order [AS-004]	
20.29	Schedule 2 (requirements)	General: some requirements state things must be done "in general accordance" with other things (requirements 5, 6, 14, 17 to 19); others state things must be done "substantially in accordance with ..." (requirements 7, 11 and 12). The difference in meaning between these terms is unclear; similarly, it's not clear why these things will not be done "in accordance with" (say) control documents. The EM deals with requirements briefly; we would expect more detail to be	JLAs	Where appropriate and reasonable, some requirements allow (i) activities to be carried out either " <i>in general accordance</i> " or " <i>substantially in accordance</i> " with specified control documents or (ii) subsequent details/plans to be submitted which are " <i>in general accordance</i> " or " <i>substantially in accordance</i> " with prior documents/strategies.	Draft Development Consent Order [AS-004] Paragraphs 9.4 – 9.36 of the Explanatory Memorandum to the Draft	

		included in the next draft when we would expect greater detail to be included in the Requirements themselves.		<p>Use of these terms in the former context allows for departures which are minor or inconsequential and not of substance, without giving rise to a criminal offence. It is beneficial to draft control documents in clear and straightforward language. Strict compliance with such wording may not always be possible. Without the wording above, in such circumstances the relevant requirement would be too easily breached and a criminal offence too easily committed. The wording above therefore ensures a proportionate approach.</p> <p>Use of these terms in the latter context allows for minor improvements (e.g. due to advances in technology or best practice) to the principles underlying the original document/strategy upon submission of the subsequent details. In any event, the submitted details will be subject to the approval of the relevant body under the terms of the requirement.</p> <p>Paragraphs 9.4 – 9.36 of the ExM contain further details in respect of each requirement.</p>	Development Consent Order [AS-006]	
20.30	Schedule 2 (requirements)	Several requirements are clearly at an early drafting stage and the Councils will need to see the next dDCO before being able to comment properly e.g., requirements 7 (code of construction practice), 8 (construction environmental management plan), 14 (air noise mitigation) to 19 (air quality plan). Similarly, requirement 14 (protected species) is struck-through and so it is not clear how protected species (defined in paragraph 1) will be dealt with.	JLAs	The requirements have been finalised in the latest draft DCO.	Draft Development Consent Order [AS-004]	
20.31	Schedule 2 (requirements)	<p>Paragraph 1(3) states –</p> <p>"References in this Order to materially new or materially different environmental effects in comparison with those reported in the environmental statement must not be construed so as to include the avoidance, removal or reduction of an adverse environmental effect that was reported in the environmental statement as a result of the authorised development".</p> <p>This seems unnecessary and if it is to be included, it should be included in art.2 (interpretation).</p>	JLAs	<p>This wording has been updated since that commented on by the Councils and is now included in article 2(9). It now reads:</p> <p><i>"References in this Order to materially new or materially different environmental effects in comparison with those reported in the environmental statement must not be construed so as to preclude the undertaker from avoiding, removing or reducing an adverse environmental effect that was reported in the environmental statement."</i></p> <p>This is a reasonable inclusion to ensure that the undertaker is not restricted by the wording of the DCO from carrying out activities (where authorised) which avoid, remove or reduce an adverse environmental effect.</p>	Draft Development Consent Order [AS-004]	
20.32	Schedule 2 (requirements)	As mentioned previously the Authorities believe that the Time limit for commencement (requirement 4) at 10 years seems	JLAs	The time limit for commencement in (what is now numbered) requirement 3 is five years beginning on the start date. This is described in paragraph 9.7 of the ExM.	Draft Development Consent Order [AS-004]	

		unreasonable and appears unprecedented. Any time limit should be explained in the EM.			Paragraph 9.7 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]	
20.33	Schedule 2 (requirements)	<p>Requirements 10 (surface and foul water drainage), 11 (traffic management), and 13 (archaeological works) indicate discharged by the “relevant planning authority”. These items may be more appropriately assigned to other specific agencies or an authority. Also, reference to only National Highways grant approval for highways works details under requirement 6(1) should also refer to the respective highway authorities.</p> <p><u>Biodiversity</u></p> <p>It is of concern that the Requirements section makes limited reference to biodiversity. In addition to the Outline Landscape and Biodiversity Management Plan, one might also expect:</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan (CEMP) • Vegetation clearance plans • Vegetation retention plans • A Biodiversity Net Gain (BNG) assessment and plan • Habitat creation method statements/plans • Site specific method statements where works are taking place in ecologically sensitive locations • Protected species mitigation plans • Biodiversity Monitoring Plan • Landscape and biodiversity aftercare plan <p>(From Table 8: Detailed Landscape Plan (soft and hard), arboricultural method statement (inclusive of associated tree protection plans), arboricultural impact assessment (with tree retention and removal plan)</p> <p>Will there be a Requirement detailing timescale for submission of reports such as an Annual Management/Aftercare & Monitoring Report?</p>	JLAs	<p>These requirements have been significantly amended since the version commented on by the Councils. GAL welcomes any further comment once the Councils have reviewed the updated draft.</p> <p>As regards the additional plans and documents proposed, GAL recommends that the Councils review the ES Appendix 5.3.2: Code of Construction Practice [APP-083], which makes provision in respect of several of these topics. The ES Appendix 5.2.3: Mitigation Route Map [APP-078] provides further detail about how necessary mitigation measures are secured.</p>	<p>Draft Development Consent Order [AS-004]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [APP-083]</p> <p>ES Appendix 5.2.3: Mitigation Route Map [APP-078]</p>	
20.34	Schedule 2 (Requirements)	Requirement 6 Highway Works – this requires approval in writing from National Highways. It is not clear why approval is only being sought from National Highways, should be LPA in consultation with Highway Authorities as necessary. Also 6(3) and 6(4) should refer to the Highways authority.	JLAs	These requirements have been significantly amended since the version commented on by the Councils. GAL welcomes any further comments once the Councils have reviewed the updated draft.	Draft Development Consent Order [AS-004]	

		<p>Requirement 8 CEMP – no details provided; the Highway Authority will comment as details are worked up by GAL.</p> <p>Requirement 11 Traffic Management –approved in writing by the relevant planning authority, following consultation with relevant highway authority on matters related to its function.</p> <p>Schedule 2 Requirement 12 Construction Traffic Workers – as above, should this be approved by the relevant LPA in consultation with the relevant Highway Authority.</p>				
20.35	Schedule 4 (Streets to be permanently stopped up)	These are still to be agreed.	JLAs	Noted.	N/A	
20.36	Schedule 7 (New and realigned classified trunk roads)	These are still to be agreed.	JLAs	Noted.	N/A	
20.37	Schedule 8 (Traffic Regulation)	WSCC have not presently received sufficient justification to agree to all these TRO changes.	JLAs	GAL welcomes further engagement with the Councils on this.	N/A	
20.38	Schedule 14 (procedure for approvals, consents and appeals)	<p>Paragraph 3 (fees for dealing with applications under the Order) is currently blank. The EM states: “[The Schedule] also provides for the payment of fees in respect of the discharge of requirements. The fee rates for discharge of requirements of different types is based upon the fees payable for the discharge of similar types of condition under the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended in 2017).</p> <p>The Authorities wish to ensure that any costs in handling the discharge or requirements are fully met and that the Authorities can ensure they have the resources to be able to handle the discharge effectively. In this regard the authorities would seek discussions with GAL to consider the most appropriate way forward either through specific application fees or through the potential</p>	JLAs	The Councils' comment appears to be incomplete (ending "or through the potential..."). Regardless, GAL is happy to continue discussions on the most appropriate way forward as regards the Councils' fees arising from the proposed development.	N/A	
20.39	E.M 3.4.1	It is stated that ‘The undertaker should be permitted to carry out low impact preparatory works following the grant of the Order, while it is working to discharge the pre-commencement Requirements, thereby helping to minimise the construction timetable.’ Such low	JLAs	It is widely precedented (as set out above in Row 20.1) that categories of activity are excluded from the definition of "commence" so that they may be carried out prior to discharge of all pre-commencement requirements to minimise the construction timetable. These activities must be development authorised in the articles and Schedule 1 of the DCO, which the Councils are able	N/A	

		impact preparatory works would need to be specified and agreed with the relevant LPA in advance.		to scrutinise through the DCO examination. It would run contrary to the purpose and benefit of providing for categories of pre-commencement activities to require that each work carried out must be specified and agreed in advance with the relevant local planning authority.		
20.40	E.M 3.6	Article 2(3) provides that measurements within the Order are approximate. Have previous orders included this provision in the same form?	JLAs	The wording of article 2(3) has advanced since that commented on by the Councils. The form now included is based on article 2(3) of the model articles and is well-established in precedent.	Draft Development Consent Order [AS-004]	
20.41	E.M 4.24	This is necessary to ensure the airport operator can continue, in particular, to rely on its extant permitted development rights to facilitate the on-going operation of the airport and to allow for minor works to be separately consented without needing to rely on an amendment to the DCO which would be disproportionate and impractical in the circumstances. Consideration would need to be given as to where some permitted development rights may be restricted by 'Requirement' or by other means as appropriate.	JLAs	Noted and GAL is willing to consider any proposals from the Councils. The need for GAL to preserve its permitted development rights is set out at point (5) in Row 20.7 above.	N/A	
20.42	Article 12 Power to alter, layout of streets	GAL are seeking powers outside the order limits. As per comment above (51) clarification should be provided as to why and what streets.	WSCC	Article 12 no longer seeks this power.	Draft Development Consent Order [AS-004]	
20.43	Art.17 Classification of roads, etc	Cross reference to the corresponding Schedule is blank, however it is Schedule 7. As per no 66 of this list items needs to be considered and agreed.	WSCC	Noted.	N/A	