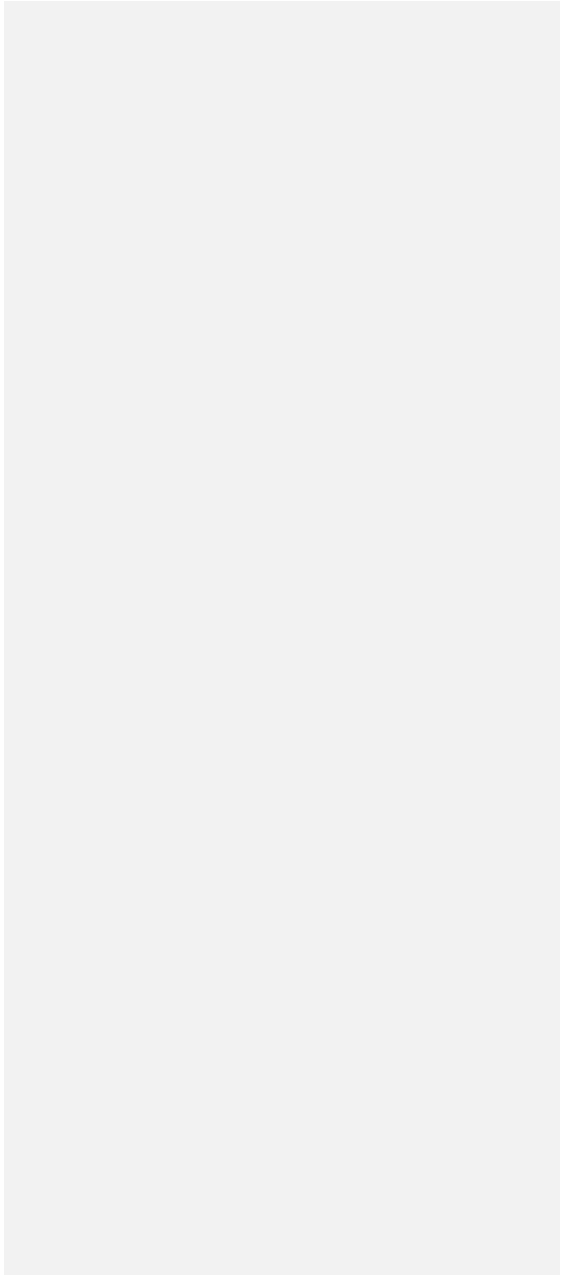


Principal Areas of Disagreement Summary Statement (PADSS) from Reigate & Banstead Borough Council			Version Number: V1.0 Submitted at: 26 October 2023	
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
	PROJECT SITE & DESCRIPTION			
1.	Plans and definitions	A variety of definitions including the dDCO limits, limits of works, operational land and airfield boundaries are used which are confusing for both the existing and future airport boundary.	Clarification is sought	Likely
2.	Loss of Vegetation Barrier along A23	The verdant vegetation barrier from Church Meadows, Riverside Garden Park through to the M23 junction has taken more than a generation to achieve with the result that a highly significant separation barrier has been grown between Horley and the airport along with providing a classic 'parkway' appearance. However, this has been omitted from the description.	Inclusion sought together with details of its replacement	Likely
	NEEDS CASE			
3.	The capacity deliverable with the NRP	Modelling by GAL of the capacity deliverable with the NRP has assumed that 1 minute separations can be achieved between all departing aircraft using the two	Full modelling of the interaction	Likely – subject to GAL transparently

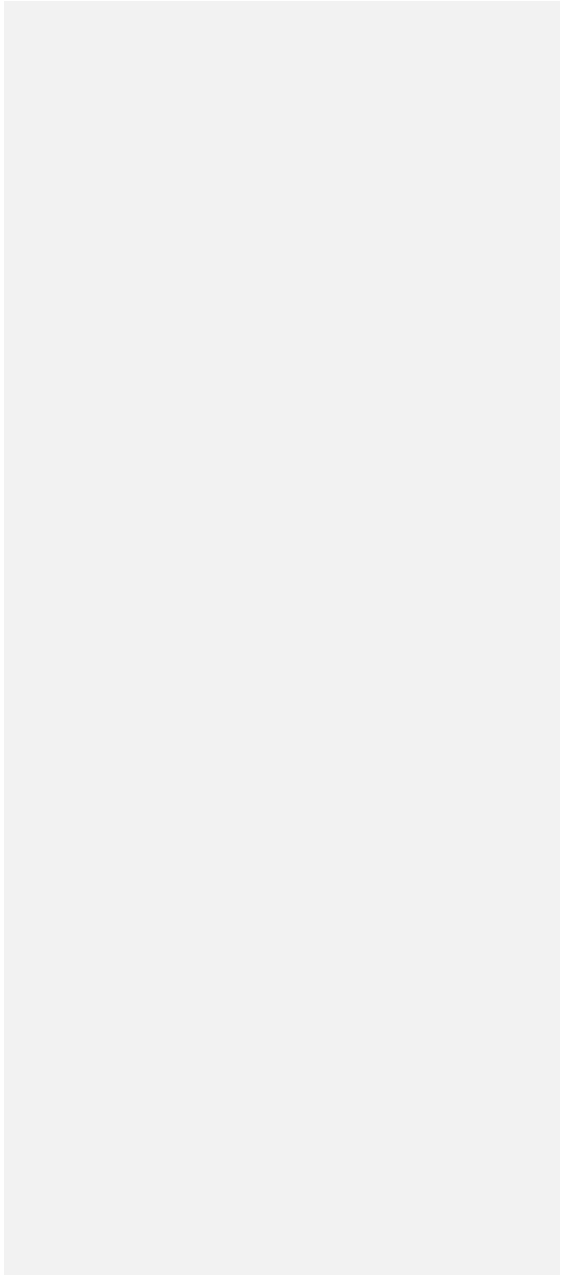
	Proposed Development	runways. This is not possible with the existing structure of SIDS, particularly given the commitment not to use WIZAD SID in the night period, and so additional delays to aircraft will arise so increasing delays above those stated in the Application documents. Consequently, the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.	between the use of the two runways and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.	undertaking and sharing the relevant simulation modelling.
4.	The forecasts for the use of the NRP are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for	The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (see point above). It is not considered good practice to base long term 20 year forecasts solely on a bottom up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport. In this case, top down benchmarking against national forecasts has failed to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand	Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick in competition with other airports,	Likely – subject to GAL producing robust modelling to underpin its forecasts of demand.

	<p>Transport forecasts and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.</p>	<p>across the London system is reliant on the assumption that a third runway would be delivered at Heathrow.</p>	<p>not limited simply to traffic, including that from other regions of the UK, that has historically used the London airports.</p>	
5.	<p>Overstatement of the wider, catalytic, and national level economic benefits of the NRP.</p>	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</p>	<p>The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified.</p>	<p>Likely – subject to remodelling of impacts by GAL.</p>

			The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.	
6.	Employment Growth and housing.	ES Appendix 17.9.3 Assessment of Population and Housing Effects	Inconsistency of housing availability and affordability for future airport employees. In Reigate & Banstead. affordability ratio last year was 14.38. This was increasing	Likely – additional work to economic case needed.

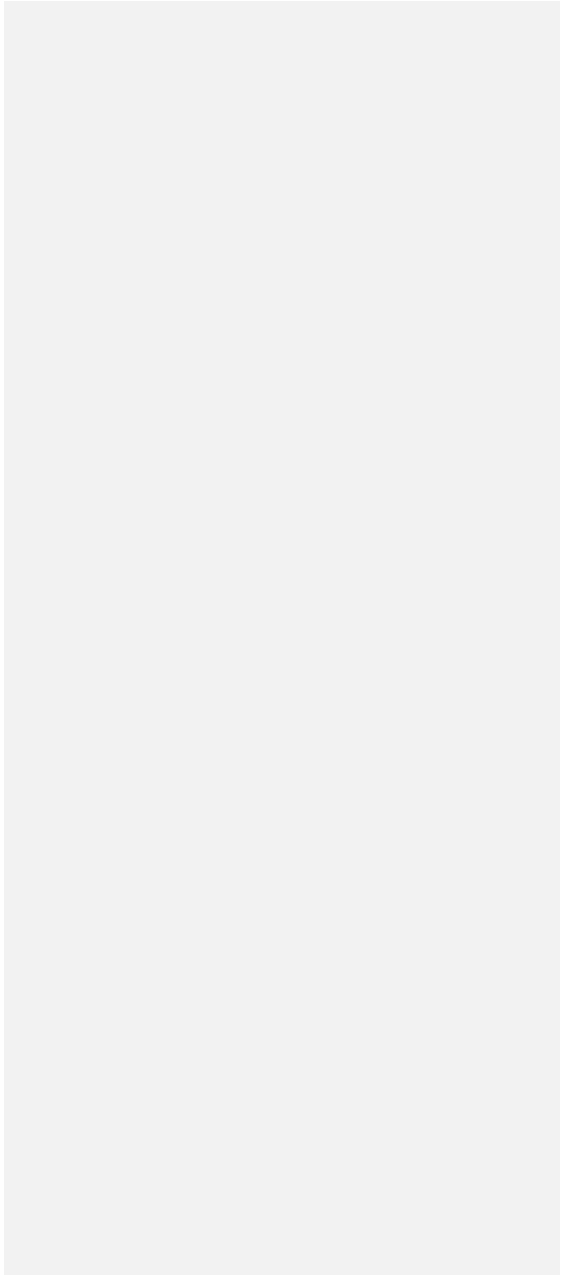


			<p>demand for private rental housing which itself was under stress. These factors do not appear to have been factored into the local growth scenario and raises questions on local employment growth in the borough from the new jobs at Gatwick particularly as many of the new jobs will be low value. Economic impacts need to consider housing affordability.</p>	
7.	Employment, Skills and Business Strategy	Lack of Implementation Plan	An implementation plan with robust monitoring is needed to	Uncertain



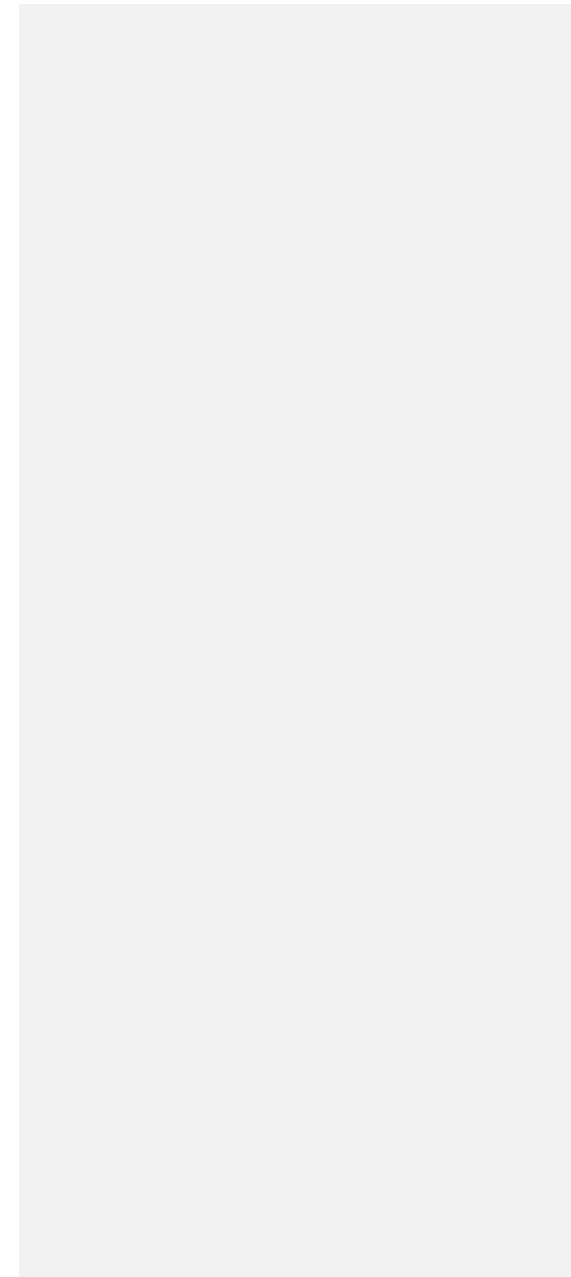
			ensure that local communities are benefitting from having an enlarged Gatwick on their doorstep.	
	HISTORIC ENVIRONMENT			
8.	Impact of the A23 London Road/River Mole bridge and road widening on the Listed St Bartholomew's Church and conservation area and historic Church Meadows	Relates to the visual impacts of the works on the listed church and conservation area	Consideration of alternatives to reduce land take from Church Meadows	Uncertain
	ECOLOGY			
9.	The extent of loss of mature broadleaved woodland (and other habitats)	It is not clear from the application document how much woodland is being lost and how much is being enhanced / replanted. The same is true for other habitats. The ecology chapter for the ES does not quantify the amount of loss or compensation. A reference is made to these figures being included in Biodiversity Net Gain (BNG) assessment however this information is not clear within the BNG report (screenshots of the BNG metric have been provided –	The applicant should quantify losses and replacement habitat in the Ecology chapter for the ES. Additional compensation	Uncertain

		<p>but this is difficult to navigate and is difficult to review). The impact assessment should quantify the loss to accurately describe the impact. In addition, this information would aid with understanding and transparency.</p>	<p>is required for the mature woodland loss. Especially considering the lag time for newly planted woodland to mature and reach target condition.</p> <p>The BNG metric should be supplied in excel format – to aid with review of information. Habitat parcels should be clearly referenced in figures and the excel metric so that the two can be easily cross referenced and to aid with clarity over what compensation /</p>	
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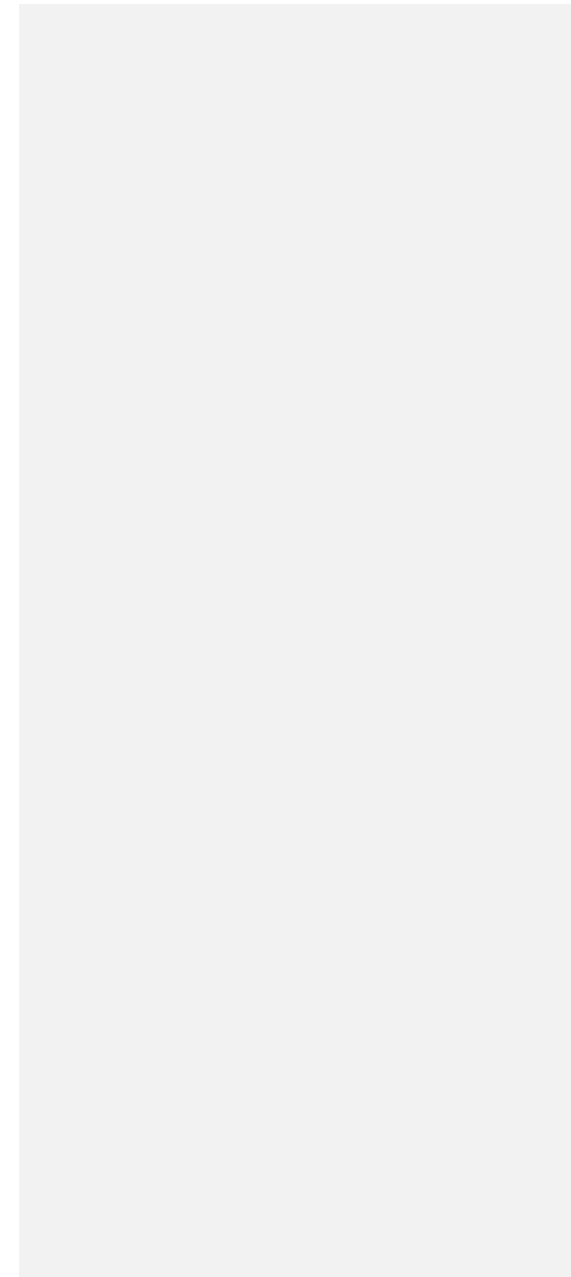
			enhancement is proposed.	
10.	Bat roost surveys of trees have not been undertaken	<p>The ecology chapter for the ES states:</p> <p><i>'A total of 43 trees within the surface access improvements boundary were identified as having bat roost potential and of these 36 would be lost. They comprised nine with High roost potential, 28 with Medium roost potential and six with Low roost potential'.</i></p> <p>No bat roost surveys of 'high' or 'medium' trees proposed for removal have been carried out to inform the baseline and impact assessment. This contravenes policy in relation to protected species.</p> <p>ODPM circular 06/2005 states:</p> <p><i>'The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.....</i></p> <p><i>It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional</i></p>	<p>Bat roost surveys of trees are required. Rare bat species have been recorded during other bat surveys and as such, there is uncertainty and lack of information on the status of roosting bats within the application.</p>	<p>Likely but surveys will be delayed until May to September 2024.</p>

		<p><i>circumstances, with the result that the surveys are carried out after planning permission has been granted'.</i></p> <p>Given that rare species of bats have been recorded roosting within the application site (informed by radio tracking surveys), these surveys are required to inform impacts and mitigation / compensation for roosting bats.</p>		
11.	Lack of information on reptile and great crested newt (GCN) mitigation	<p>The ecology chapter for the ES states that reptile and GCN mitigation will involve translocation to receptor sites and where relevant, European Protected Species Licences would be applied for post DCO consent. However, no detailed information is provided for the reptile and GCN mitigation strategy, for example:</p> <ul style="list-style-type: none"> • Where are the receptor sites? Reference is made to Longbridge Roundabout, Museum fields and other mitigation areas but there is no detail as to which one of these has been chosen to be the receptor locations for reptiles and GCN. • No methodology or timings information for the mitigation strategies. 	More detail required on proposed receptor sites and outline mitigation strategies for reptiles and GCN should be provided.	Likely but may require additional surveys



		Whilst it is appreciated that this is outline consent, an outline mitigation strategy is still required for reptiles and GCN.		
12.	No compensation provided for loss of ponds	The ecology chapter states that no replacement ponds will be provided within the application site due to airport airstrike safety. This is fully justified however, it is not understood why off-site provision of new ponds has not been considered.	Replacement ponds should be provided off-site – preferable within the nearby Biodiversity Opportunity Areas to maximise ecological opportunities / outcomes.	Likely
13.	BNG baseline assessment methodology	The BNG baseline has been calculated excluding those areas of the site which will not be impacted by the proposals (i.e airfield grassland). This is a non-standard approach and it is assumed that this approach has been adopted so that net gain can be achieved from a lower baseline value (i.e. net gain is easier to achieve as baseline value is lower).	The BNG assessment should follow standard practice. The baseline BNG value of the site should include all habitats within the DCO application boundary. It is currently unclear whether the application	Likely

			would achieve net gain as the baseline value which has been used does not include all habitats within the DCO application site.	
14.	Need to adopt a landscape scale approach to assessing and addressing ecological impacts	Ecological impacts will extend beyond the Project Site boundary with potential impacts on bat populations, riparian habitats downstream of the airport and the spread of non-native aquatic species. Disturbance and habitat severance within the airport, including the removal of woodland, trees and scrub along the A23, will impact the functioning of wildlife corridors, notably bat commuting routes both within the Site and the wider landscape. Maintenance of habitat connectivity across the airport and wider landscape remains a concern.	GAL should adopt a landscape scale approach to assessing and addressing ecological impacts, including the need to provide off site mitigation, compensation and BNG. RBBC would expect enhancements to green corridors and improved habitat connectivity to extend beyond	Uncertain



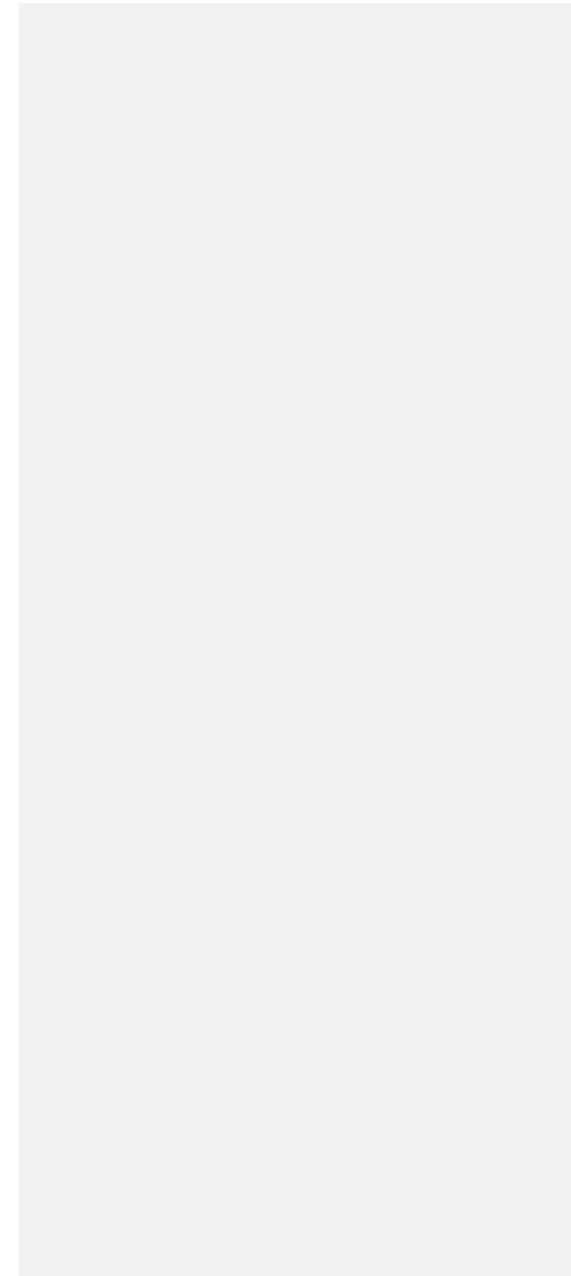
			the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	
15.	Additional opportunities for biodiversity enhancement	Many potential opportunities for biodiversity enhancement, both within and outside the Site, were never explored. For example, conversion of 'amenity grassland' currently present on road verges and roundabouts within the Site to wildflower grassland through reduced mowing and/or re-seeding with wildflowers, and the improved management of Gatwick Stream.	Explore further opportunities for biodiversity enhancement, both within and outside the Site.	Likely
16.	Security of long term positive management of the two biodiversity areas managed by GAL, the North West Zone (NWZ) and Land East of the Railway Line (LERL)	The North West Zone (NWZ) and Land East of the Railway Line (LERL) are of considerable biodiversity value and key components of the ecological network. Any loss or degradation could have significant impacts on the effectiveness and viability of the proposed mitigation areas. ES Ch. 9 Section 9.6.172 states that 'Positive work through the GAL Biodiversity Action Plan (BAP) is likely to continue ...'.	A legal commitment from GAL to provide certainty that these two biodiversity areas will continue to be managed for wildlife. One option might be to include their management	Uncertain

			within the LEMP.	
17.	Redesign of Drainage systems and ecological impacts	Significant changes to the drainage systems are proposed with significant engineering solutions however how ecology will be affected by sediment build up, flood overspill and pollution control measures	Clarity sought on drainage system interventions on ecology up to 2047	Likely
18.	Gatwick Greenspace partnership	The Planning Statement refers to the Gatwick Greenspace Partnership ' <i>GAL works closely with Gatwick Greenspace, which benefits people, wildlife and the countryside. Gatwick Greenspace is one of the Sussex Wildlife Trust's Living Landscape projects and works across 200 square kilometres of countryside between Horsham, Crawley, Horley, Reigate and Dorking. Its aim is to inform, educate and involve a diverse range of people and work with local landowners including the Forestry Commission, the Wildlife Trusts and the Woodland Trust, plus local authorities to support them in managing their land more sustainably and in partnership with others. GAL has supported the Gatwick Greenspace Partnership with the introduction of an Assistant People and Wildlife Officer overseeing habitat management and coordinating volunteers who help maintain and improve the 75 hectares of woodland, grassland and wetland around the airport. As part of this Project, it is</i>	RBBC would be keen to be included in this partnership. Clarification over the detail of the S106 for the NRP would be beneficial for us to understand the level of contribution to the Gatwick Greenspace Partnership and the priorities for biodiversity enhancement.	Likely

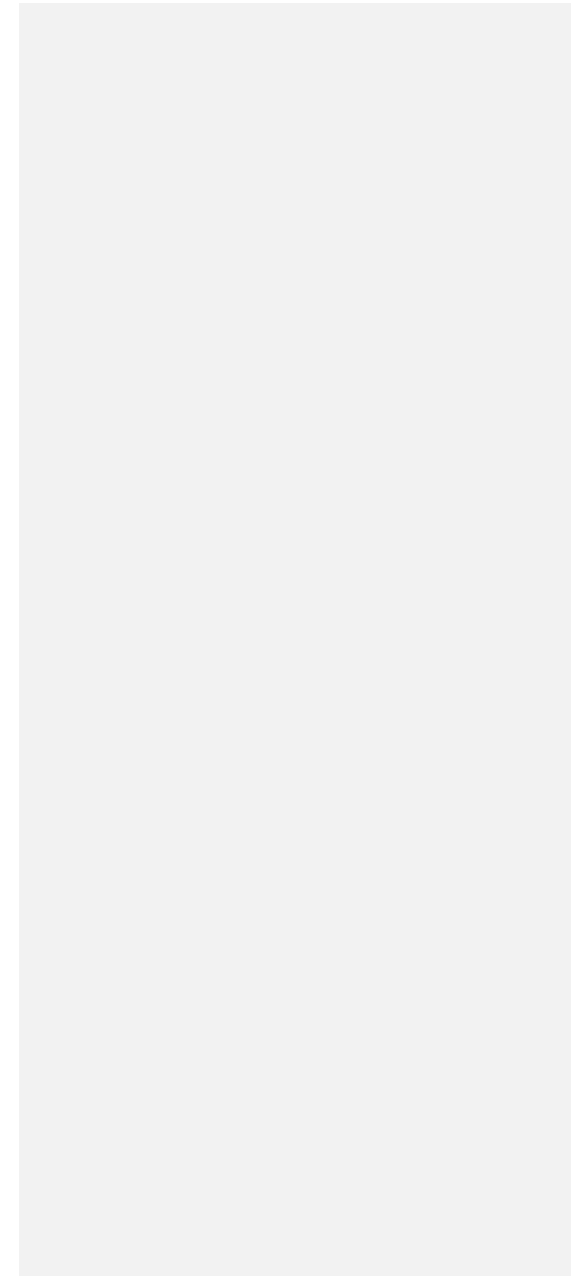
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		<i>proposed to continue to support this initiative via the new NRP Section 106 Agreement'</i>		
	WATER			
19.	Increased flood risk to Longbridge Road	Adjacent to confluence of Gatwick Stream, River Mole and Highways drainage channel are houses in Longbridge Road which risk being flooded. Not clear if proposer's on airport flood control measures would reduce flood impact along Longbridge Road	RBBC would welcome opportunities to reduce floodrisk in this locality	Uncertain
	TRAFFIC AND TRANSPORT			
20.	Proposed Surface Access Interventions	<p>Surface Access Commitments (SAC) Interventions include:</p> <ul style="list-style-type: none"> • Financial support for enhanced regional express bus or coach services and local bus services; • Funding to support local authorities in implementing additional parking controls or in enforcement action against unauthorised off-airport passenger parking sites; • Charges for car parking and forecourt access to influence passenger travel choices; • Introducing measures to discourage single-occupancy private vehicle use by staff, incentivise active travel use and increase staff public transport discounts; • Use of the Sustainable Transport Fund to support sustainable transport initiatives; and • Provision of a Transport Mitigation Fund to support additional measures should these be needed as a result of growth related to the Airport. 	RBBC wish to understand the details behind these proposals, including the typical parking and access charge, size of Sustainable Transport Fund and Transport Mitigation Fund to provide confidence that the measures can and will be delivered.	Likely

21.	Ability to achieve modal shift	The proposal will increase airport capacity in the early morning slots. However, for most passengers checking in before 7pm – 2 to 2.5 hours before their departure there is only very limited public transport	Improvements to public transport including rail services from 4am to deliver modal shift targets.	Unlikely – the promoter will argue this is beyond their remit. However, unless such improvements are achieved, modal shift improvements to 60% of passengers is unlikely to be achieved in our view and therefore a cap on flights before 8am should be introduced until the modal shift for those passengers is achieved.
22.	Overly optimistic reliance on new technologies to reduce carbon emissions in the aviation sector.	Carbon emission reductions are linked to the introduction of low carbon aircraft and reliance on biofuels in the aviation sector.	The documents support an overly optimistic development timeline for low carbon aircraft and greater use of aircraft using biofuels.	Uncertain – remodelling would be required looking at different scenarios.



23.	Surface Access Commitments	RBBC seeks staged growth	GAL to propose an alternative set of commitments that follow the principle of staged growth; such as those being pursued by Luton Airport in their DCO. These commitments would prevent growth until interim surface access commitments had been met and thus ensure that sustainable travel was at the heart of Gatwick's growth, rather than a target after growth.	Uncertain
24.	Ensure Texaco Petrol Station on A23 can remain operational during	To support viability of petrol station and service it provides to drivers and the local community	Review works programme to ensure safe access to and from the petrol	Likely – as needs moderate refinement of



	<p>construction process with vehicles able to turn into the site from both south and northbound carriageways. Access by pavement should be retained for pedestrians as important path for local communities</p>		<p>station, including for fuel deliveries is retained throughout the works,</p>	<p>construction protocols.</p>
25.	<p>Retention of Woodroyd Avenue garages access</p>	<p>Behind the Texaco petrol station on the A23 are a row of garages off Woodroyd Avenue adjacent to the blocks of flats. The proposer is seeking to use this route as an access point to the works on the two River Mole Bridges. This route is also used for access to the garages and the large bins associated with the blocks of flats.</p>	<p>Continued safe access is required between the garages to the bin service area and for the users of the remaining garages.</p>	<p>Likely – would need to be included in the Code of construction practice or similar.</p>
AIR QUALITY				
26.	<p>Monitoring (Conventional) (AQA1 in action tracker)</p>	<p>The commitment to funding the council's monitoring needs to be to 2047 or 389 000 movements whichever occurs later and then after this period subject to review, not 2038 as in the current document.</p> <p>Reason</p>	<p>Commitment to funding the council's monitoring to 2047 or 389 000 movements whichever</p>	<p>Uncertain</p>

		<p>The airport based on the emissions inventory will see an overall increase in emissions of 4.3% between 2038 and 2047 with a 7.9 % increase in aviation emissions (the dominant local pollution source) over this period, given pollution levels from the airport are actively increasing over this period monitoring using type approved monitoring needs to remain in place.</p> <p>This is in line with the council's final action tracker:</p> <p>AQA 1 in action tracker: Continued funding of RG1, RG2(6) and RG3 sites on an annual basis, and also capital replacement (every 10 years RG1 and RG3 and every 7 years RG2) of these sites as per current s106 agreement, with an appropriate CPI uplift every 5 years, out to a minimum of 2047.</p> <p>Funding of the CBC owned monitor.</p>	occurs later (not 2038).	
27.	Monitoring Ultrafines (AQA1 in action tracker)	<p>Para 13.9.19 p.65 GAL commits to participating in national aviation industry body studies of UFP emissions at airports including those reviewing how monitoring could be undertaken.</p> <p>The council has no issue with GAL participating in national schemes but this does little to address the impact of ultrafines on the local community, and how concentrations are changing as a result of rapid growth from the DCO and thus the potential health impact on the local community. Therefore, there is a need to fund in full the monitoring of ultrafine</p>	Funding of ultrafine particle monitoring on the Horley Gardens Estate (particle size and particle number) standards used on the UK national network. The	Uncertain

		<p>particles on the Horley Gardens Estate examining both particle size and particle number to the same standard as that used on the UK national network. The funding needs to continue to 2047 or until the airport reaches 386,000 total movements – whichever occurs later.</p> <p>AQA1 in action tracker Funding of ultrafine particulate monitoring at the RG1 site (particle counts and size distribution) using equipment as used on the national UPF network. Annual running costs plus capital replacement on a 10 year basis out to a minimum of 2047.</p>	<p>funding till 2047 or until the airport reaches 386,000 total movements – whichever occurs later. To cover capital and running costs.</p>	
28.	Use of the Sussex air guidance (AQA2 in tracker)	<p>No provision of the webTAG calculation of the damage cost of the road traffic pollution. Para 13.12.6 in Chapter 13 states the costs associated with air pollution are considered under the Socio-Economic Effects of Chapter 17. However, these cost calculations do not appear to be in chapter 17.</p> <p>The local authorities had agreed that for the road traffic element the TAG damage cost approach was acceptable for calculating the air quality cost rather than the method in the Sussex Air Guidance. (Jan 23)</p>	<p>Provision of TAG calculations for air quality.</p>	Uncertain
29.	Air Quality Action Plan - Operational (AQA3 in tracker)	<p>The mitigation and enhancement measures that are planned as part of the operational phase of the project for air quality need to be clearly set out as an action plan. At present it simply refers to the carbon action plan, but it is unclear which of these measures are</p>	<p>Provision of air quality action plans measures in single document, with quantification of</p>	Uncertain/Likely

		<p>intended to benefit air quality, nor is any indication given as to the likely reduction such measures are likely to deliver either in terms of emissions or concentrations.</p> <p>The current approach appears contrary to what was agreed in the topic working group of 16th Jan 23, when it was stated: GAL will include an Air Quality Action Plan in addition to the mitigation sections in the ES, and also the draft action plan presented to the LAs in the topic working group on 21/10/22.</p> <p>AQA 3 in action tracker 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.</p>	emissions / concentration reductions.	
30.	Air Quality Action Plan – Construction Dust Management Plan / Monitoring (AQA4 in tracker)	Dust management plan needs to be provided. While some elements of the plan may be site specific there is no reason why a draft version of the plan cannot be shared at this stage.	Provision of Dust Management Plan or outline DMP should be developed during the examination and the CoCP updated accordingly to secure the DMP.	Likely
31.	Air Quality Action Plan –	A commitment needs to be made to only use on road vehicles that meet the London Low Emission Zone	Commitment in CoCP	Uncertain

	Construction Emissions Management (Traffic/ NRMM)	<p>standards– and for NRMM equipment to meet London's 'Low Emission Zone' for Non-Road Mobile Machinery standards with equipment meeting Stage IV requirements from 2024, and stage V from 2030.</p> <p>The current wording refers to 'encourage' rather than it being a mandatory requirement. Given the proposed project has a construction period extending over 14 years it needs to be using the lowest emission equipment available for the type of plant being used.</p>		
32.	2047 assessment scenario (AQA5 in tracker)	<p>The 2047 base and with development scenario need to be modelled in full.</p> <p>In 2038 over 50 % of the NOx pollution at some sites on the Horley Gardens Estate is due to the airport, and in practice is likely to be higher still given the model does not reflect the falling levels of pollution from background sources. Therefore the airport is the dominant significant local source in 2038.</p> <p>Based on the emissions inventory the airport will see an overall increase in emissions of 4.3% between 2038 and 2047 with a 7.9 % increase in aviation emissions (the dominant pollution source of the airport component) over this period. Given the airport is both the dominant local source of pollution and emissions are increasing between 2038 and 2047 this needs to be modelled to understand the impact of the rising emissions on the local community.</p>	Contour mapping and source apportionment outputs for 2047 base and 2047 with development.	Uncertain

33.	Ultrafines Health Assessment (AQA 11 in tracker)	<p>The health impact assessment of ultrafine particles understates the potential health impact as it appears to assume exposure is correlated to PM_{2.5} exposure.</p> <p>At this stage clarification is needed on what assumptions have been made in relation to correlations between ultrafine particle concentrations and PM_{2.5} concentrations in the qualitative health assessment of ultrafines, especially in relation to the aviation derived ultrafines component.</p>	Depends on clarification response.	
34.	Modelling 2029 to 2032	<p>The separation of construction and operational assessments over the period 2029 to 2032 is likely to result in an underestimation of the ‘true’ pollutant concentrations experienced by residents during this period.</p> <p>For residents of the Horley Gardens Estate there is rapid growth in aviation pollution between 2029 and 2032, while construction traffic is likely to be elevated throughout this period and not just in 2029.</p> <p>There is no information in either the air quality chapter or the Surface Access Commitments document of how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored.</p>	Depends on clarification response.	
NOISE				

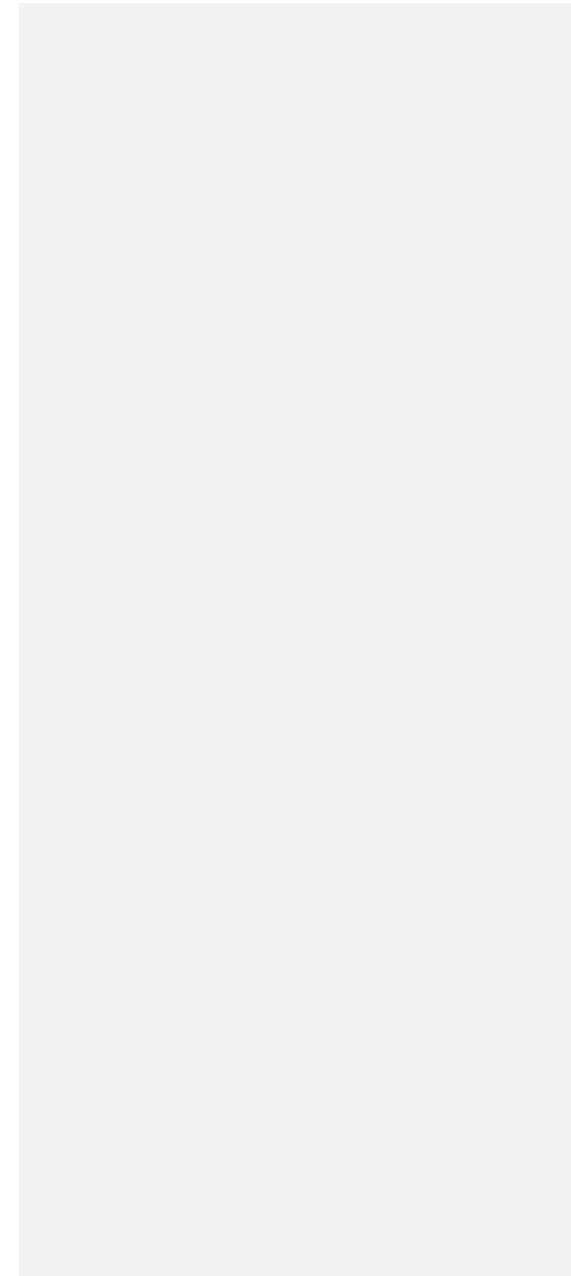
35.	Information provision	During the DCO process for Noise GAL have refused to supply and blocked access to information that the local authorities including Reigate & Banstead have asked for to help inform the topic working group meetings that have developed this DCO submission.	There are a number of key areas that the authority has issues with, and as such additional matters maybe added to the PADDs list as the process continues.	Uncertain
36.	Interpretation of national policy (Air Noise)	The Council disagrees with the Applicant's interpretation of national policy in respect of aviation noise which appears to have influenced their approach to the work. As a result the benefits of technological improvements are not being shared sufficiently with affected communities and the total adverse impacts of noise are not being mitigated. The approach does not appear consistent with the Noise Policy Statement for England.	The relevant chapters and appendices need to be updated so that assessment of impact and assessment of impact is suitably revised.	Concern is likely to be addressed but likelihood of agreement between parties is uncertain.
37.	Local Planning Policy (Air Noise)	Local planning policies in relation to noise are briefly referred in sections 14.2.61 to 14.2.62 of Chapter 14 the Environmental Statement. There is no explanation of the policies, the weight given to them and how they have influenced the design, assessment of impact and mitigation of the proposal. This is contrary to the 'Balanced Approach' required by UK and international policy.	The undertaker needs to clearly explain how they have had regard to (or otherwise) local planning policy. This is not only in relation to noise but also	Uncertain

			for wider impacts on land use planning including provision for housing and other noise sensitive development that will be affected by the NRP. The policies are understood to be material planning considerations.	
38.	Threshold and scope of LOAELs and SOAELs (Air Noise)	The ES only considers the Leq metric for LOAELs and SOAELs. In doing so it makes reference to national policy. The consideration only of Leq as a metric is too narrow and other metrics should be applied to the decision processes within the project to inform impact and mitigation. In determining the LOAELs and SOAEL more recent data, including planning decisions and revised health assessment criteria need to be applied. The consideration only of the Leq metric does not represent all the effects of air noise across the borough.	Inclusion of assessment for a wider range of criteria, including but not exclusively, awakenings, N above contours in addition to the Lden and Lnight.	Uncertain
39.	Health LOAELs and SOAELs (Air Noise)	Health impact of noise (Chapter 18 – health and wellbeing) is likely to be significant under estimate of the noise impact in view of the choice of LOAELs and SOAELs	Significance of effects is calculated using	

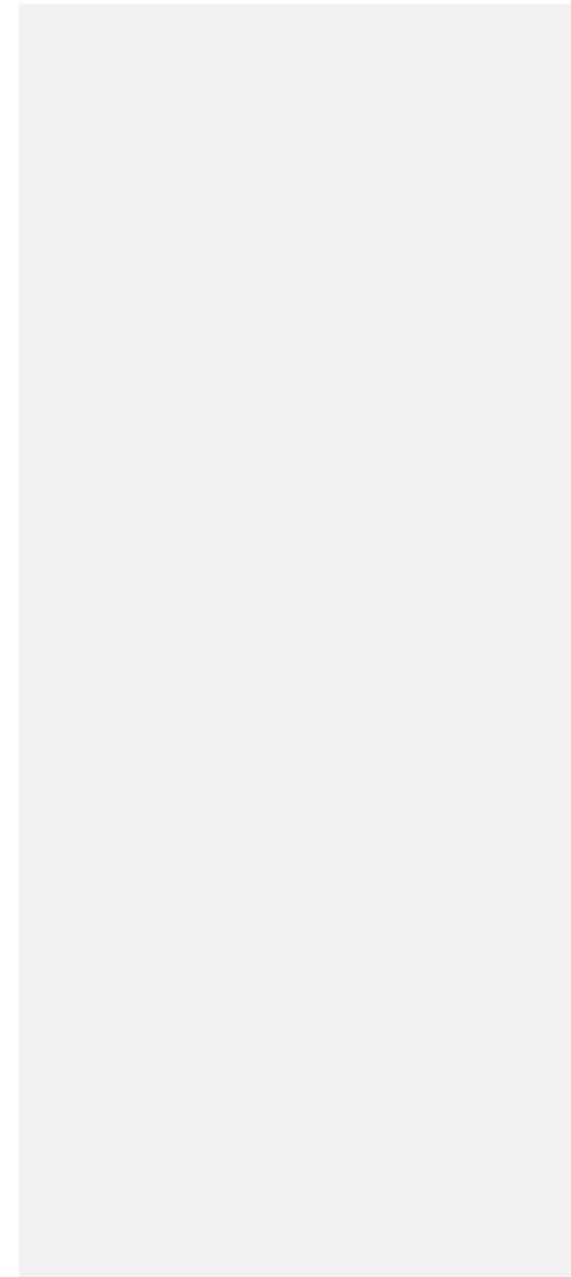
			more recent data.	
40.	Modelling Scenario (Air Noise)	Absence of a 2029 scenario modelled using 2019 ATMs i.e. 2029 noise modelling scenario is run using 284,987 ATMs to demonstrate the extent to which the airport is sharing the benefits of quieter aircraft with the local community, and to assess the health impacts of the airport growth in its totality. This data would then help inform the setting of the noise envelope on the basis of the airport is allocated 50 % of the noise improvement for its growth.	Production of the noise contours in first instance.	Likely
41.	Noise Envelope (Air Noise)	There are issues with all aspects of the noise envelope as currently proposed.	Very significant changes are required.	Uncertain
42.	Noise insulation	The noise insulation scheme is not sufficient to protect those who will suffer adverse effects of noise and the consequences of the installation of noise insulation. There are multiple issues with the scheme, by way of example we disagree that the thresholds of qualification are set at the correct level and for the correct parameters; consider it has no regard to overheating created as a result of the installation of noise insulation measures; disagree that once installation is complete all ongoing maintenance / running and potential replacement costs are borne by the householder / person in charge of the premises; and everyone should be eligible for the scheme whether or not they have qualified previously.	The applicant will need to improve the offering based on consideration of a wider range of determinants and having regard to multiple use types; make separate provision for prevention of overheating; define	Uncertain

			qualifying areas based on single mode noise contours.	
43.	Noise Barrier	There is a need for a noise barrier on the A23 south of the Longbridge roundabout.		Unlikely unless required as part of DCO
44.	Draft DCO (Noise Control)	<p>The control of air noise, by metric and operational limitation, is under-represented in the DCO including (but not exclusively) the noise envelope requirements, use of routes, night flying restrictions, limitation on passenger numbers and freight movements; and conditional slot management.</p> <p>For example there is no commitment in the work to a movement cap in the core night period (23:30 to 06:00) in the winter (3,250 movements), and summer (11,200 movements) periods.</p>	A substantial review of the DCO to ensure there is adequate representation of, amongst other things, noise and associated operational controls, enforcement mechanisms, access to information, noise envelope scrutiny group, funding of a local authority costs including staff and specialists as required to	Uncertain

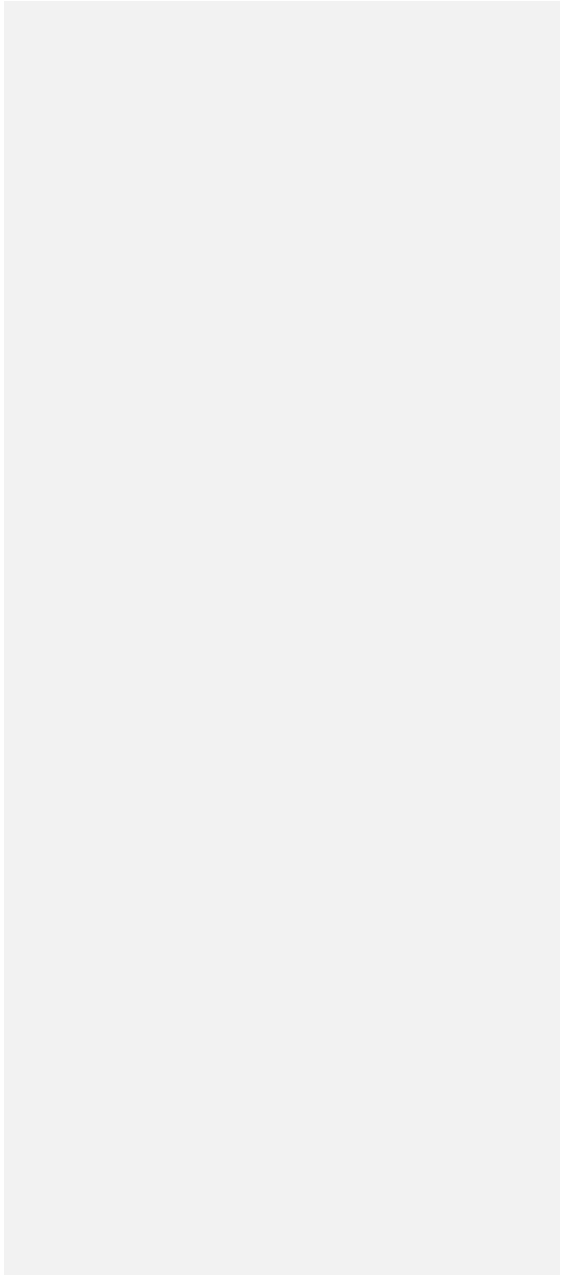
			oversee the DCO.	
45.	Lack of ongoing research to test adequacy of proposals	<p>The ES utilises models to predict noise levels, the impacts, the locations of the impacts and inform mitigation. All decision making is based on the knowledge described in the ES at the time of the determination of the application.</p> <p>There are no proposals for research to improve understanding as part of an iterative development of an environmental impact and management system.</p>	<p>We expect Gatwick to fund work, that is commissioned by the local authority or Gatwick (at the discretion of the host authority) into a wide range of matters including improving the noise contours so that lower noise levels can be effectively modelled; establishing local population attitudes to noise; validating effectiveness of noise insulation works; techniques to tackle overheating in noise insulated</p>	Uncertain



			properties. Once the work is completed it is then used to improve systems or adapt the mitigation appropriately or both as is the case with the work.	
46.	Construction Noise	Potential issues on various topics subject to clarification and around the working hours 'off' airport.	Subject to further clarifications.	Uncertain
	CLIMATE CHANGE			
	Environmental Statement Chapter 15 Climate Change			
	Baseline Information Review			
47.	Time periods considered for climate change projections are not far enough into the future to represent the worst case scenario.	The most distant time period chosen for assessment was 2040-2069 (2060s) (paragraph 15.5.2 of ES Chapter 15 Climate Change), however, some asset components are assumed to be operational in perpetuity. These climate change projections are not adequately far enough into the future to represent the worst case scenario.	The Applicant should collect additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are	Likely

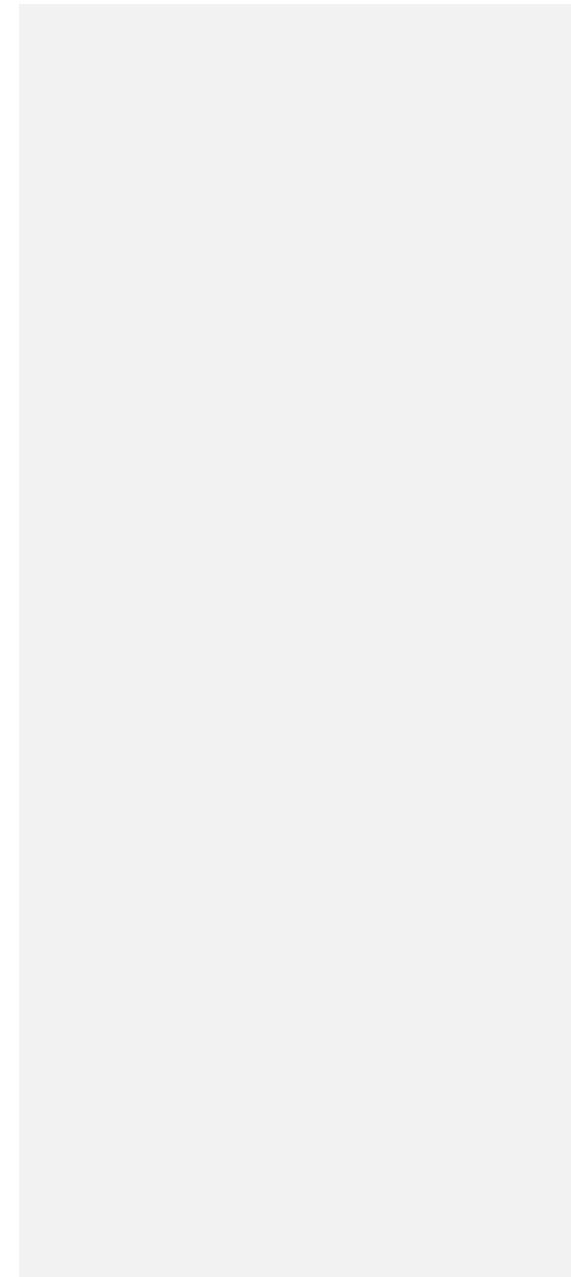


			<p>accounted or. Data available includes:</p> <ul style="list-style-type: none"> • PPCE (Probabilistic Projections of Climate Extremes) for future climate extremes – available between 1961 and 2100. <p>Probabilistic projections (25km) - up to 2070-2099 (2080s) is available.</p>	
	Assessment of significant effects			
48.	Identification of construction risks is limited.	Construction risks identified (refer Table 15.8.5 of ES Chapter 15 Climate Change) are limited and could be addressed in more detail e.g. flooding of site or construction compounds causing health and safety issues, damage to equipment and/or impacts to the construction programme and resulting cost increases.	The Applicant should undertake a more detailed identification and assessment of construction	Uncertain.



			related climate risks and distinguish areas that are particularly vulnerable and may require specific adaptation measures to be in place.	
49.	Inconsistency and lack of detail in some climate impact statements.	The climate impact statements (Table 15.8.5 and Table 15.8.6 of ES Chapter 15 Climate Change) are lacking in consistency in in that some are missing an 'impact'. They have a cause, an 'event' but no end 'impact'. This end result is what should determine the consequence rating and could have led to an underestimation of risk.	The Applicant should update all climate impacts statements to have a clear end impact so that all risks are articulated in a consistent way.	Uncertain.
	Mitigation, Enhancement and Monitoring			
50.	Lack of identification of additional mitigation / adaptation measures.	Whilst the Applicant may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures should be noted and communicated with an indication of who is responsible and timing. For example, Appendix 5.3.2 lists a number of 'options for climate	The Applicant should identify further adaptation measures that can be implemented in design,	Uncertain

		resilience measures' which should also be included in this report.	construction or operation to further reduce the project's vulnerability to climate change.	
	5.3 Environmental Statement - Appendix 15.5.2 Urban Heat Island Assessment			
	Mitigation, enhancement and monitoring			
51.	Mitigation measures should be proposed to reduce the impact of UHI effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	Uncertain.
	5.3 Environmental Statement - Appendix 15.8.1 Climate Change			



	Resilience Assessment			
	Assessment of significant effects			
52.	Inconsistency and lack of detail in some climate impact statements.	The impact statements are lacking in consistency in that some are missing an 'impact'. They have a cause and an 'event' but no end 'impact'. This end result is what should determine the consequence rating and may be why no risks are rated higher than a medium.	The Applicant should update all climate impacts statements to have a clear end impact for consistency. The risk ratings should then be revised accordingly.	Uncertain.
53.	Identification of construction risks is limited.	Construction risks identified are limited and could be addressed in more detail e.g. flooding of site causing health and safety issues, damage to equipment and/or construction programme impacts and resulting cost increases.	The Applicant should undertake a more detailed identification and assessment of construction related climate risks.	Uncertain.
54.	Concerns regarding underestimation of risk.	Regarding Risk 7, there is a concern that the impacts could be more severe than just delays in fuelling i.e. reaching flashpoint of aviation fuel on extreme hot days could lead to combustion. Also given it has been suggested that there may be hydrogen usage for low	The Applicant should review the articulation of risk, impact and risk rating	Uncertain.

		emissions vehicles during construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.	and revise where appropriate. Further consideration should be given to climate risks associated with hydrogen storage and usage.	
55.	Lack of identification of additional mitigation / adaptation measures. (Same concern as with the main report i.e. Chapter 15 Climate Change)	Whilst the Applicant may not have assessed any risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures to increase resilience should be noted and communicated with an indication of who is responsible and timing of implementation.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change. Where these are included in the report, DCO, or Control Docs will need to show how these are to be	Uncertain

			secured, delivered & maintained	
56.	Lack of consideration of storm events.	Storm events are not considered sufficiently in this assessment. Risk 21 could be extended to include storm events (i.e. extreme rainfall, thunder, lightning and wind), resulting in delays to aircraft take-off and landing. Furthermore, we suggest the likelihood rating is too low and the description of 'As likely as not' is more appropriate. Evidence of this risk already occurring this year can be found online: https://www.bbc.com/news/uk-england-sussex-65875840	The Applicant should further consider storm events and risk description with rating to be revised.	Likely
57.	Lack of consideration of wildfire	Wildfire is not mentioned as a possible climate hazard impacting the airport's operation. Wildfires in the surrounding area, in particular the smoke they generate, can impact airport operations, e.g. flights can be delayed, or certain planes may have to be diverted. Refer to following incident: https://www.express.co.uk/news/uk/1653913/Gatwick-airport-fire-smoke-runway-flights-wildfire-heatwave-drought	The Applicant should consider the risks associated with wildfire & associated smoke.	Likely
58.	Lack of consideration of fog	Risks associated with fog were not included in the risk assessment. Fog can impact visibility and the ability to perform day to day airport operations. Adequate consideration should be given to this in the risk assessment.	The Applicant should undertake further research to gain clarity around how fog may change in the future as a result of climate change and	Likely

			give further consideration to its risks.	
59.	Insufficient detail on the climate change impact on critical airport equipment and infrastructure.	Consideration to be given to how climate change could impact critical equipment and infrastructure e.g. power, telecommunications as well as the embedded and additional mitigations to reduce this risk. For example, flooding or storm events impact critical power equipment causing a power outage. What redundancy is in place for this?	The Applicant should include risk and mitigation details regarding the climate change impact on critical airport equipment and infrastructure.	Likely
	5.1 ES Chapter 20 Cumulative Effects and Inter-Relationships			
60.	Disagree with the assessment that 'cumulative effects are not relevant'.	We understand that a conclusion may be drawn that cumulative impacts from nearby projects maybe be 'insignificant', but we disagree with the statement that 'An assessment of cumulative effects is not relevant'. For example, nearby projects could exacerbate the urban heat island impact of the project or increase the impact of flooding to the site or access to the site.	The assessment should be reconsidered and reworded to reflect that it is not irrelevant.	Likely
	KEY CONCERNS			
	GREEN HOUSE GAS EMISSIONS			
	Environmental Statement			

	Chapter 15 Climate Change			
	Legislation, policy and guidance			
61.	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/ CORISA.	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/CORISA.	Can the Applicant please confirm in the need case for the scheme if it considered the impact of ETS/CORISA?	Likely
62.	UK Climate Change Committee (CCC) Progress in reducing emissions report, published in June 2023.	The Climate Change Committee (CCC) plays a crucial role in monitoring the UK's progress towards its legally binding carbon budgets and emissions reduction targets under the Climate Change Act 2008. The latest CCC Progress Report (2023) identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero. See Page 267, 'Airport expansion' bullet point of the latest report ¹ .	The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory	Likely

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

	Baseline Information review			
63.	GHG emissions from airport buildings and ground operations in the ES [TR020005] (Table 16.4.1) does not appear to include maintenance, repair, replacement or refurbishment emissions.	<p>The scope of the GHG emissions from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment emissions. This would under account operational GHG emissions.</p> <p>It is not clear what is captured under “other associated businesses”.</p>	The Applicant needs to clarify if maintenance, repair, replacement or refurbishment emissions were calculated and, if not, justify why. Can you please explain what emission sources are defined under “other associated businesses”.	Likely
	Assessment of significant effects			
64.	The ES [TR020005] fails to consider the risks raised by the CCC's expert advisory panel, which warns that	The CCC, in their latest progress in reducing emissions publication (June 2023) and previous publications, raised serious concerns over the UK Jet Zero policy as summarised in Page 267, ‘Airport expansion’ bullet point of the latest report ² .	The Applicant needs to assess the concerns and issues raised by the CCC regarding the	Likely

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

	<p>the UK jet zero policy is non-compliant with the UK's net zero trajectory. Therefore, the conclusion of ES is not in alignment with the IEMA (2022) GHG Assessment Guidance.</p>	<p>The GHG aviation methodology has resulted in a lack of transparency with regard to the emissions relative to the without Project Scenario since by 2047, there will be an increase of around 60,922 Annual Aircraft Movements as presented in Table 3.7.1 of the ES [TR020005]. The GHG Assessment conceals the emissions by applying emissions reductions from the Jet Zero High Ambition scenario.</p> <p>Therefore, based on the 'high risk' of the Jet Zero High Ambition Scenario not being achieved, emissions from the Project will be significantly higher than the baseline scenario. Hence, based on the advice from the CCC, it would suggest that the expansion of the GAL airport and increase in demand is not in line with the UK's net zero trajectory.</p>	<p>Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p>	
65.	<p>In the Cumulative Effects Section 16.10 of the ES [TR020005], no assessment of cumulative UK airport expansion emissions has been considered on how this will impact the UK's net zero trajectory.</p>	<p>The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels³. This Figure is not up to date as Gatwick is proposing to increase its operating capacity to 80.2 million passengers per annum, which would make the total Figure >150 million more passengers a year by 2050 relative to 2019 levels.</p> <p>As discussed above, airport expansion, demand management, and reliance on nascent technology are three key areas raised by the CCC that could jeopardise the UK's net zero trajectory. A significant increase of >150 million passengers will greatly increase the UK's cumulative aviation emissions,</p>	<p>The Applicant needs to provide an updated cumulative assessment that considers the combined impact of all major UK airport expansions and how this could impact the UK's</p>	<p>Likely</p>

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

		which may have significant consequences on the UK's net zero trajectory.	net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).	
	Conclusions			
66.	No consideration is provided in the ES around the risk of the Jet Zero Strategy and the impact this would have on the significance of the assessment.	Group for Action on Leeds Bradford Airport and Possible submitted a judicial review in October 2022 of the UK Aviation Jet Zero strategy. The CCC has consistently stated that the Government needs to <i>"implement a policy to manage aviation demand as soon as possible"</i> ⁴ . The GHG Assessment does not acknowledge any of these concerns and risks of the Jet Zero strategy, which the GHG Assessment hinges on.	The Applicant needs to consider the issues raised in the UK Aviation Jet Zero strategy's judicial review and the CCC's concerns. Please reflect on how these concerns could impact the UK's net zero trajectory.	Likely
67.	Summary	In summary, the GHG Assessment fails to consider the risks of the Jet Zero Aviation Policy and how this could compromise the UK's net zero trajectory in alignment with the concerns raised to the UK Government by the CCC and in the judicial review.	The Applicant needs to address the comments raised above and update the	Likely

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

		Additionally, the GHG Assessment does not assess the cumulative impact of the Project in the context of the eight of the biggest UK airports planning to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels.	GHG Assessment to adequately consider the risk of the UK Aviation Jet Zero strategy and the cumulative impact of the Project.	
	5.3 Environmental Statement - Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions			
68.	It is not clear if carbon calculations were carried out during the construction lifecycle stage in the ES [TR020005] for well-to-tank (WTT) emissions.	Excluding WTT is non-compliant with the GHG Protocol Corporate Accounting Standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. This also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24.	The Applicant needs to update the GHG Construction assessment to account for WTT emissions.	Likely

69.	<p>The RICS distances were referenced in Table 4.1.1 of the ES [TR020005] for the average material haulage distances. However, the RICS transport distances were not applied comprehensively.</p>	<p>Currently, only 100km was considered for construction-related A4 emissions, which is not in alignment with the recommended RICS transport distances. Furthermore, no global shipping emissions were considered as part of the GHG assessment, which is not in alignment with the RICS global transport scenario. This therefore under accounts the construction transport emissions.</p>	<p>The Applicant needs to conduct a comprehensive transport assessment in alignment with the RICS transport distances⁵</p>	<p>Likely</p>
<p>5.3 Environmental Statement - Appendix 16.9.2 Assessment of Greenhouse Gas Emissions for Airport Buildings and Ground Operations (ABAGO)</p>				
70.	<p>In Table 2.1.1 it is confirmed that the carbon calculations do not include well-</p>	<p>Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology [TR020005] in Section 16.4.18). This also contradicts the GHG ES</p>	<p>The Applicant needs to update the GHG ABAGO assessment to</p>	<p>Likely</p>

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

	to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Methodology [TR020005] referenced under Section 16.4.24	account for WTT emissions.	
71.	In Section 1.2.1, it is not clear if carbon calculations are carried out for maintenance, repair, replacement or refurbishment emissions.	Maintenance, repair, replacement or refurbishment emissions are not indicated to be scoped in the GHG ABAGO assessment. These emission sources could potentially account for a significant portion of the ABAGO emissions.	The Applicant needs to provide a justification for why these were not calculated within the GHG ABAGO Assessment.	Likely
	5.3 Environmental Statement - Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions			
72.	It is not clear how or if Applicant converted CO ₂	It is not clear if the Applicant undertook a conversion from CO ₂ to CO _{2e} as this would impact the aviation	Can the Applicant please confirm if a conversion	Likely

	emissions from aircraft to CO ₂ e.	emissions by around a 0.91% increase BEIS (2023) ⁶ . Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO ₂ e in 2028 in the most carbon-intensive year where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	was undertaken from CO ₂ to CO ₂ e? If not, the Applicant is required to update the GHG Aviation Assessment to account for this.	
73.	In Aviation methodology well-to-tank (WTT) emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24. This would result in an underestimation of the GHG emissions associated with aviation since a 20.77% (BEIS, 2023 ⁷) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO ₂ e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	Can the Applicant please confirm if WTT was applied to the Aviation GHG assessment? If it was not, the Applicant is required to update the GHG assessment to account for WTT emissions.	Likely
	SOCIO-ECONOMIC			
74.	00881- Book 5 Appendix 17.8.1 Employment,	Require Implementation Plan	Required to assess that local communities	Uncertain

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

⁷ <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

	Skills & Business Strategy		will benefit first from Gatwick Growth	
75.	00881- Book 5 Appendix 17.8.1 Employment, Skills & Business Strategy	Need for Agreed monitoring requirements	To assess outcomes from economic growth	Uncertain
	AGRICULTURE & RECREATION			
76.	Church Meadows	Restoration - The Design and Access Statement 8.3.9.4 includes a pond but this is excluded from other documents	Clarity sought as a pond could affect future management of the Meadows	Likely
77.	Riverside Gardens Park	Detailed tree and vegetation Removal Report	Report needed to identify loss and quantum of replacement required	Likely
78.	Riverside Garden Park	Mitigation of land take and impact on Riverside Gardens Park.	Tree and vegetation planting scheme to restore Riverside Gardens Park post DCO work and reduce impact of widened road –	Uncertain

			to be agreed with RBBC	
79.	Riverside Garden Park	Construction Impacts	Code of Construction Process needs to include measures to ensure that construction works along Riverside Gardens Park are contained against the road and highways drainage channel. Needs to include measures where accidental damage to trees and fabric of park are harmed.	Uncertain
80.	Carpark B addition to Riverside Gardens	Proposal to gift this land to RBBC to replace lost sections of Church Meadows and Riverside Gardens.	Agreement will be needed with RBBC on the redesign and planting of the car park along with suitable	Likely – indicative scheme already exists.

			access both for users and maintenance purposes before it is signed across to RBBC.	
81.	Cycle ramp into Riverside Gardens Park	Key detail missing	Need detail of the ramp including new vegetation and linkages with existing paths and delivery timescales	Likely
82.	Footpaths/ cycle route 360 beside London Brighton Railway Line and associated bridge works.	These paths will be closed during the widening of the A23 bridge over the railway lines. Due to the scale of works proposed it essential that a north south pedestrian/ cycle route is retained close by and that the routes are fully restored	TR020005-000898-5.3 ES Appendix 19.8.1 Public Rights of Way Management Strategy Schedule of works needs to highlight that a north south pedestrian path will be retained. That notification of the closures and reopening is well	Likely

			publicised, and that restoration of paths is undertaken to a standard acceptable to the local authorities. At present the document doesn't appear to seek Local Authority agreement.	
83.	Railway Line Footbridge north of A23 Bridge works	Concern that the alleyway from The Crescent and footbridge will be used as point of access during A23 Railway Line bridge widening works.	The Crescent should not be used as a parking area for vehicles associated with the DCO works as it will negatively impact on local residents.	Likely
84.	Cycle Route NRP21	The route under the A23 will be closed during the road/ bridge works. Alternative north south safe cycle and pedestrian routes must be maintained throughout the closure along with effective communications by the proposer and their contractors. Before re-opening the route should be relayed on the approaches and through the tunnel to encourage more use and an	Certainty needs to be included in the support documentation.	Likely

		awareness campaign should be run on the re-opening, by the proposer.		
85.	Balcombe Road to Peake Brookes Lane Access Route	A new access road to a new highway drainage pond off Peaks Brook Lane is proposed (See Document 809 Book 4 Rights of Way and Access), will result in further tree and vegetation loss, and will edge into countryside land to the north at Rough's Corner.	This is the first time this has been mentioned and detail is needed including trees to be removed, changes to drainage layout and details of the access route and how access will be controlled especially as there is a home immediately adjacent to the Balcombe Road access point	Likely
	WORKS COMPOUNDS			
86.	Car Park B Works Compound	We understand that two storey accommodation will be used to house 40 construction workers on site.	Detail is required on the location of these units, their proximity to the residential properties in	Likely

			The Crescent and their appearance	
87.	South Terminal Roundabout Works compound	This compound will block future redevelopment of the RBBC Local Plan Development Management Plan site policy HOR09. Whilst a compound will be required for the Highway construction works, we consider that this should be relocated to another location away from the Site Allocation. Failing that the longevity of the compound's existence should be reduced to support the site's delivery and more detail provided on the compound.	Reprioritising the road works so that the Railway Line Bridge widening, South Terminal Junction Grade separation and Balcombe Road Bridge works are completed prior to the opening of the northern runway to minimise the blockage to the development of the HOR09 site.	Unlikely
88.	Construction works access from South Terminal Junction Works Compound via Balcombe Road	Balcombe Road is a narrow predominantly residential road	Works access should be restricted to using the southern end of Balcombe Road thereby avoiding the	Likely

			residential properties.	
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