

Principal Areas of Disagreement Summary Statement (PADSS) from Surrey County Council - Version Number: One Submitted at: Pre-examination - 29<sup>th</sup> October 2023

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

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3	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.	The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified. The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.	Uncertain – subject to remodelling of impacts by GAL.
<b>Environmentally Managed Growth</b>				
4	Unlike other airport expansion schemes there is no attempt to consider environmental impacts holistically	As part of their DCO application Luton Airport have proposed a Green Controlled Growth approach, which places controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise and surface access. If any limit is breached, further growth will be stopped, mitigation will be required and ultimately, airport capacity would be constrained until environmental performance returned below the limits. No comparable approach is proposed at Gatwick.	Development of an environmentally managed growth approach. Greater controls need to be incorporated into proposals, whereby GAL is required to mitigate in advance of growth	Uncertain
<b>Traffic and transport</b>				

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5	Legislation and Policy	SCC is concerned about the level of growth assumed by GAL in its case for the scheme and that by attempting to accommodate such growth, the NRP includes additional car parking spaces and enhancements to the highways network that might not otherwise be required.	Further exploration of airport capacity and resultant demand and whether this would require all the proposed infrastructure required in the DCO.	Uncertain
6	Assessment methodology, assumptions and limitations of the assessment	SCC is concerned that the modelling tools adopted cannot be considered accurate enough to provide confidence in their outputs, whether it is likely that GAL will be able to meet their Surface Access Commitments and thus whether the ES has thoroughly assessed all the potential impacts.	Sensitivity test information in respect to the issues raised, as well as in relation to the age of the model data (2016), impact of Covid using DfT tests, and other stress tests such as impact of realistic minimum and maximum car access/parking charges.	Uncertain
7	Assessment methodology, assumptions and limitations of the assessment	SCC is concerned that the extent of the VISSIM model includes only one junction in Surrey's network (Longbridge Roundabout), but the extent should be much larger.	The microsimulation study area to be increased to cover more of the SCC network, to enable detailed investigation of the impact of the NRP on its local road network to be understood.	Uncertain
8	Baseline Environment	SCC is concerned that high levels of background traffic on the SRN (M25), which is demonstrated as being at capacity in 2029 in the westbound direction in the morning peak and in the eastbound direction in the evening peak, will increase traffic on the local road network both directly and indirectly as non-airport traffic re-routes off the SRN on to SCC's network.	SCC wishes to understand the volumes of traffic transferred on to its network either directly to/from the airport or displaced from the SRN on to its network and what the impacts of this traffic would be.	Uncertain
9	Baseline Environment	SCC is concerned that the baseline includes the 2,500 additional spaces via robotics at the South Terminal long	SCC wishes to understand the implications if the 2,500 spaces	Uncertain

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		<p>stay parking area even though it is yet to be agreed whether this would count as permitted development as it has not been trialled yet.</p>	<p>are not permitted development - in particular, whether the associated highway infrastructure proposed would still be appropriate in such a case, and that the DCO should not provide permission for these spaces if they are not allowed under permitted development.</p>	
10	<p>Mitigation and Enhancement Measures Adopted as Part of the Project</p>	<p>SCC is concerned that the following elements of the surface access interventions which form part of the SAC remain unspecified:</p> <ul style="list-style-type: none"> <li>• Financial support for enhanced regional express bus or coach services and local bus services;</li> <li>• Funding to support local authorities in implementing additional parking controls or in enforcement action against unauthorised off-airport passenger parking sites;</li> <li>• Charges for car parking and forecourt access to influence passenger travel choices;</li> <li>• Introducing measures to discourage single-occupancy private vehicle use by staff, incentivise active travel use and increase staff public transport discounts;</li> <li>• Use of the Sustainable Transport Fund to support sustainable transport initiatives; and</li> <li>• Provision of a Transport Mitigation Fund to support additional measures should these be needed as a result of growth related to the Airport.</li> </ul>	<p>SCC wishes to understand the details behind these promises, such as 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.</p>	<p>Uncertain</p>

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11	Mitigation and Enhancement Measures Adopted as Part of the Project	SCC note that a heavy reliance is placed on charges for car parking and forecourt access (see above) and also for rail projects to deliver surface access commitments. However, there are no new rail proposals associated with the project, just 2-3 extra peak hour trains and 10 extra off-peak trains per hour that are planned to happen regardless of the project.	Sensitivity tests that assume less ambitious delivery of increased rail services to the airport and to understand what GAL is prepared to do to ensure that this is a minimum level of rail service to the airport.	Uncertain
12	Mitigation and Enhancement Measures Adopted as Part of the Project	SCC is concerned that the bus and coach services seem to be under-played: they fail to meet the target in the 2014 ASAS for a second runaway, and there is no indication of the willingness of operators to provide these services or advise if others may be required	Further evidence of GAL's engagement with bus and coach operators and to understand GAL's commitment to delivering improved bus and coach access and increased contribution to passenger and staff mode share.	Uncertain
13	Mitigation and Enhancement Measures Adopted as Part of the Project	Feedback provided by SCC in February 2023 (GAL NRP DCO_Review of Highways Design Strategy Report_v1) with regard to the highway and active travel infrastructure proposals do not appear to have been satisfactorily actioned, while review of the submitted material associated with the DCO application has identified further queries and concerns.	Plans to be provided or conditioned that are detailed enough to judge design compliance and that cover all the proposed improvements, with acceptance of the design also conditioned accordingly. GAL to revise the highway and active travel infrastructure proposals to address the issues raised.	Uncertain
14	Mitigation and Enhancement Measures Adopted as Part of the Project	The active travel infrastructure proposed is unsatisfactory, especially considering ambitious sustainable mode share targets set.	SCC requests inclusion of additional active travel route improvements requested.	Uncertain

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15	Assessment of Effects	SCC has already outlined concerns about the performance of the models used, the extent of models used and low level of impacts reported. Until these have been addressed, SCC cannot comment on the assessment of effects.	SCC wishes to see concerns about the modelling tools addressed before the assessment of effects can be agreed.	Uncertain
16	Surface Access Commitments	It is a concern to SCC that GAL appear to have proposed a less ambitious sustainable transport mode share target than previous documents aimed for and that efforts to meet them in a business-as-usual scenario seem to have been neglected.	<p>SCC would like to understand why the targets in the Second Decade of Change published in the same year as the DCO application, are now just an aspiration and not consistent with SAC and what will be required to meet those targets in both the future baseline and scheme scenarios in specific years.</p> <p>SCC would like GAL to propose an alternative set of commitments that follow the principle of environmentally managed growth, such as those being pursued by Luton Airport in their DCO application. These commitments would prevent growth until interim surface access commitments had been met and thus ensure that sustainable travel was at the</p>	Uncertain

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			heart of Gatwick's growth, rather than a target after growth.	
17	Securing mitigation	SCC is concerned that the highway-based mitigation, secured through this DCO, is planned to commence as soon as the airside works have been completed rather than establishing whether they would be required at that time if the SAC were met or exceeded. That the first Annual Monitoring Report (AMR) will be produced no later than six months before the commencement of dual runway operations provides the opportunity for evidenced based growth to occur.	SCC wishes to see mitigation that leads to sustainable travel delivered upon commencement of works and that additional highway capacity and parking capacity is not commenced until the SAC are met.	Uncertain
18	Securing mitigation	SCC is concerned that <i>"if the AMR shows that the mode share commitments have not been met or, in GAL's reasonable opinion, suggests they may not be met (having regard to any circumstances beyond GAL's control which may be responsible)"</i> , GAL has the opportunity to prepare an action plan for the next two years to address any shortfall but that there does not appear to be any sanction if the SAC are not met by that time.	SCC wishes to see growth delivered in a sustainable way, such that the SAC are met before further growth in passenger and staff numbers is allowed.	Uncertain
19	Securing mitigation	SCC is concerned about the impact of construction of the SAC on its road network.	SCC wishes to see mitigation during the Longbridge Roundabout construction, A23 reconstruction and Balcombe Road Bridge installation. GAL also need to engage with SCC regarding consideration of Lane Rental schemes as well as the Permit scheme within the DCO.	Uncertain

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20	Securing mitigation	Whilst previous information indicated that Longbridge Roundabout would form part of the main construction routing, it now appears that construction routing for the other compounds beyond South Terminal (Airside, MA1, Car Park B, Car Park Y, Car Park Z,) will use the North Terminal Roundabout for access.	SCC requests confirmation that Longbridge Roundabout is only needed for access to the Longbridge Roundabout compound.	Likely
21	Securing mitigation	The entrance to the Longbridge Roundabout compound is not defined.	SCC seeks confirmation of this	Likely
22	Securing mitigation	SCC is concerned that separate entrances to the South Terminal compound are proposed for HGVs (from the roundabout) and private vehicles (from Balcombe Road). This implies that an extended journey on the local road network is required.	SCC wishes to see all access to the South Terminal compound from the South Terminal Roundabout.	Uncertain
<b>Drainage and impact on Lead Local Flood Authority</b>				
23	Clarity required around climate change allowances used in relation to the water environment	Only contains details of fluvial climate change allowance.  Surrey County Council design guidance recommends using the Upper End rather than Central when determining climate change allowances.	Pluvial climate change allowances should be included, or if none being applied.  Rationale required.	Likely
24	In the Flood Risk Assessment there are only very limited references to sustainable drainage	The non-statutory technical standards for sustainable drainage have not been referenced. These state that discharge should be to pre-development greenfield run-off rates for the 1 in 1 year and 1 in 100 year events.	Scheme should include analysis of sustainable drainage elements that could and should be included across the development alongside analysis of their multifunctional benefits.	Uncertain
25	Protective Provisions for Lead Local Flood Authority	Protective Provisions for Lead Local Flood Authority in respect of Ordinary Watercourses are not in dDCO.	Protective Provisions must be agreed and included in the DCO.	Uncertain



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26	Revisions required to Code of Construction Practice Annex 1 Water Management Plan	Revisions required relating to temporary diversion of an ordinary watercourse, discharges to a watercourse and ordinary watercourse consent.	Revisions required	Likely
Noise				
27	Air noise - Threshold and scope of LOAELs and SOAELs	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.	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
28	Air noise - Properties that are newly exposed to noise levels exceeding the SOAEL are not identified	It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine compliance with the first aim of the ANPS	Identify how many and the location of properties newly exposed to noise levels exceeding the SOAEL.  Identify how many properties are exposed to noise levels exceeding the SOAEL for both the Central Case and the Sow Transition Case.	Likely
29	Air noise - No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary L <sub>Amax</sub> , overflight, L <sub>den</sub> and L <sub>night</sub> noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.	Provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant	Uncertain

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			identifying a likely significant effect.	
30	Ground noise - The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment.	Higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience significant noise effects that are identified in the Central Case assessment.	An assessment of Slower Transition Case ground noise effects should be provided to identify the potential for exceedances of the SOAEL at sensitive receptors.	Likely
31	Construction Noise	Range of issues subject to clarification.	Subject to further clarifications.	Likely
32	Construction noise - Significant construction noise effects	Residual significant construction noise effects should be controlled through mitigation. Insulation will be provided, but it is not clear if this would be sufficient mitigation to reduce significant noise effects	Provide detail on how significant temporary construction noise effects would be avoided and whether insulation would be sufficient	Likely
33	Noise envelope - Sharing the benefits	No details on how benefits of new aircraft technology would be shared between the airport and local communities are provided. This is a fundamental part of the noise envelope.	Details on how noise benefits are shared in accordance with policy requirements set out in the Aviation Policy Framework	Uncertain
34	Noise envelope - Slow fleet transition noise contour area limits	There is no incentive to push the transition of the fleet to quieter aircraft technology.	Noise contour area limits should be based on the Central Case	Unlikely
35	Noise envelope - Annual noise contour limits	Noise contour area limits relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period.	Annual noise contours should be included in the Noise Envelope	Uncertain
36	Noise envelope - Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	GAL wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft	There should be no allowance for the noise envelope limits to increase	Uncertain

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		technology should be covered within the constraints of the Noise Envelope.		
37	Noise envelope - CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for host authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope.	A mechanism should be included to allow the host authorities to have a role in scrutinising noise envelope reporting and take action in the case of any breaches	Uncertain
38	Noise envelope - Adoption of an action plan	A breach would be identified for the preceding year, with an action plan in place for the following year. Consequently, it would be two years after a breach before a plan to reduce the contour area would be in place.	More forward-planning needs to be adopted to ensure that action plans are in place before a breach of the noise contour area limit occurs.	Uncertain
39	Noise envelope - Two consecutive breaches to occur before capacity declaration restrictions	24 months of breach would be required before capacity declaration restrictions for the following were adopted. Consequently, it would be three years after the initial breach before capacity restrictions were in place.	More forward-planning needs to be adopted to ensure that action plans are in place before a breach of the noise contour area limit occurs.	Uncertain
40	Noise envelope - Prevention of breaches	No details are provided on what kind of actions are proposed to achieve compliance in the event of a forecast breach.	Details on mitigation measures to be adopted in the event of a forecast breach should be provided.	Uncertain
41	Noise envelope - Prevention of breaches	Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the noise envelope.	Adopt a set of thresholds that trigger preventative action. This would allow an action plan to pre-empt a breach.	Uncertain
42	Noise envelope - Capacity declaration restrictions as a means of managing aircraft noise	This would not prevent new slots being allocated within the existing capacity and is not an effective means of	Slot restriction measures should be adopted in the event of a	Uncertain

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		preventing future noise contour limit breaches if a breach occurred in the previous year.	breach being identified for the previous year of operation	
43	Noise insulation scheme - How would the scheme roll out	How would the noise insulation scheme prioritise properties for provision of insulation.	Provide details on how the scheme would roll out	Likely
44	Noise insulation scheme - How would properties be eligible	Residents of properties within the inner zone will be notified within 6 months of commencement of works; however, it is not clear what noise contours eligibility would be based upon.	Clarify what noise contours would be used to define eligibility.	Likely
45	Noise insulation scheme - Provision of different types of noise insulation	Is noise insulation in the Outer Zone restricted to ventilators or will the occupier have flexibility to make alternative insulation improvements? Ongoing maintenance costs should not be borne by the householder.	Clarify on the flexibility of the noise insulation scheme	Likely
46	Noise insulation scheme - Measurement of ground noise to identify eligibility	It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.	Provide details on how monitoring of ground noise would be undertaken and how a property would be identified as appropriate for monitoring of ground noise.	Uncertain
47	Noise insulation scheme - How will effective insulation requirements be determined	It is unclear if a property in the Inner Zone would be assessed to determine the most effective means of insulation.	Provide details on how Inner Zone properties would receive the most appropriate and effective insulation packages	Likely
48	Noise insulation scheme - Noise insulation for community buildings	Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings (e.g. care homes, places of worship, village halls, hospitals etc.) would be eligible for noise insulation.	Provide details on what community building would be eligible for noise insulation and what level of insulation would be provided.	Likely

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49	Noise insulation scheme - Properties that have already received insulation	It is not clear if properties that have already received insulation would be eligible for upgraded noise insulation as part of the new scheme.	Clarification on how properties that have already received insulation would be treated under the new scheme	Likely
<b>Employment and Skills and Socio economic</b>				
50	Assessment methodology - No consideration of effects at a local authority level.	There is no assessment of effects undertaken at a local authority level. The impacts of the project on key variables such as employment, labour market, housing (including affordable), social infrastructure and temporary accommodation need to be assessed.	GAL should undertake an assessment of project impacts on each local authority.	Unlikely
51	Assessment methodology - Assessment of impacts on property prices	An assessment of project impact on property values has been scoped out of the assessment despite PINS advice on the issue (PINS ID 4.10.3). Unless subsequently agreed otherwise by PINS, an assessment of project impacts on property prices is still required.	At the minimum, GAL should undertake a qualitative assessment which robustly assesses the project's impacts on property prices.	Unlikely
52	Assessment of significant effects	Queries remain in relation to the significance of effects during the first year of operation, operational effects and cumulative effects. These include overlap with other schemes and potential labour supply issues, magnitude scoring used and need for assessment at local authority level.	GAL should revisit the assessments based on the comments. GAL should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Uncertain
53	Assessment of population and housing effects – vacant properties	GAL provides an analysis of vacant properties, which implies that bringing these back into use will help meet the demand generated by non-home based workers. There is no analysis of why these properties are vacant, length of time vacant and barriers to bringing them back into use.	A more robust assessment of private rented market is required. GAL needs to consider how it can help to bring these properties back into use, both in the short term by the non-home based workers but also by	Unlikely

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			bringing a benefit to local areas and bringing properties back into use by local population once construction is complete.	
54	Assessment of population and housing effects – impacts on affordable housing	<p>Paragraph 7.5.1 of the Assessment of population and housing effects recognises that the project is likely to generate demand for affordable rented housing which is greater than the number of homes in the existing stock. If this exercise is done at a local authority level, then the figures are very different and the true impacts local impact could be seen.</p> <p>The assessment concludes that despite the demand from the project being skewed towards affordable housing, there are unlikely to be impacts on affordable housing beyond what is emerging or planned for. Given that affordable housing delivery does not currently meet need, the conclusion does not appear well founded.</p>	<p>GAL should substantiate the conclusion that the project is unlikely to have any impact on affordable housing demand.</p> <p>The analysis should be updated at a local authority level to help identify issues which need to be planned for and mitigated.</p>	Uncertain
55	Gatwick Construction Workforce distribution technical note – distance travelled to work date	<p>Additional information is requested in a number of areas:</p> <ul style="list-style-type: none"> <li>- Does the Construction Industry Training Board data in terms of average distance workers travel to sites for each region of the UK adequately consider differences that exist within local geographies.</li> <li>- Where Census 2011 data is being relied upon for analysis, there needs to be acknowledgement this could affect the accuracy of home-based (HB) and non-home based (NHB) worker estimations.</li> </ul>	GAL should review their approach to this assessment and apply relevant assumptions to the modelling to address concerns raised.	Unlikely

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		The gravity model used to identify the split of HB and NHB workers does not appear to take account of current local labour supply constraints locally.		
56	Gatwick Construction Workforce distribution technical note - Private rented sector (PRS) accommodation	Details are provided of allocation of NHB workers by local authority vs supply of private rental sector beds. Table 6-5 presents PRS bed supply for 2021 by local authority but it isn't clear how these figures have been derived given Paragraph 3.5.2 advised the data on bedrooms was gathered from the 2011 Census. In addition, whilst the figures present PRS bed supply, they do not advise on the availability of accommodation. In the light of a declining supply of rental accommodation and feedback from local authorities on limited availability this would seem to be a significant omission.	GAL should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include the English Housing Survey and liaison with local authorities in the FEMA.	Uncertain
57	Employment and Skills Business Strategy - Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to Implementation Plan is not identified.	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why GAL is unable to provide further details within the ESBS in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a Business as Usual (BAU) scenario. Furthermore, the ESBS does not set out any process for how the Implementation Plan would be developed.	GAL should provide more detail on tailored initiatives align to local need. This should include relevant baseline information to demonstrate local need. GAL should provide details on performance, financial management, monitoring and reporting to be developed further as part of an Implementation Plan. GAL should explain the difference in BAU and DCO scenarios in terms of provision and outputs. A route map is required to explain	Uncertain

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			the process from ESBS to Implementation Plan.	
58	Gatwick Community Fund	Lack of commitment on Gatwick Community Fund amounts.	Detail required on financial values	Likely
<b>Public Health, including air quality</b>				
59	Consideration of cumulative impact on key neighbourhoods	Parts of Horley and Charlwood will be affected by both construction and operation of the project. Horley Central and South is one of the most deprived LSOAs in Surrey and the full cumulative impact of construction and operation phases of the project must be considered, including the short and long term effects on physical and mental well being and health.	Evidence that cumulative impacts, particularly for vulnerable group populations have been considered and adequate mitigation measures proposed.	Uncertain
60	Health impact of ultrafine particles	That the health impact of ultrafine particles appears to be understated and that there is a lack of any plans to undertake long term residential real time monitoring of ultrafine particles, both number and size distribution, using equipment used on the UK national network	Request for the local authority real time (NOx, PM, ozone) and diffusion tube monitoring to be funded (revenue and capital replacement costs to 2047 or 389,000 movements.	Uncertain
61	Assessment of true pollutant concentrations in the period 2029 - 2032	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.	Request for combined assessment.	Uncertain
<b>Heritage</b>				
62	Written Scheme of Investigation for Post-Consent Archaeological Investigations – Surrey	The sampling strategies set out in paragraphs 6.2.17 and 6.2.18 are not wholly acceptable as they do not conform to	SCC can provide details of the adopted sampling strategies.	Likely –it does indicate that the methodology will be agreed with SCC



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		the minimum standards adopted by the council for the examination of archaeological features		
<b>Rights of Way</b>				
63	Additional complimentary RoW improvements not fully explored	The scheme has not fully explored how further improvements to the Rights of Way network around the airport could increase opportunities for sustainable travel from surrounding residential areas such as Charlwood, Hookwood and Povey Cross.	Inclusion of additional active travel improvements and consideration of how wider infrastructure improvements can be enabled through the various funds being made available.	Uncertain
<b>Landscape and Visual</b>				
64	The approach to and judgements within the Landscape and Visual Impact Assessment	Range of concerns, including quality of visualisations, approach to tranquillity assessment, treatment of undesignated landscapes and assessment of effect.	Addressing of concerns relating to the assessment.	Uncertain
65	Consideration of the potential changes to the Surrey Hills AONB boundary	It does not appear that this has been considered.	Consideration in assessment.	Uncertain
66	The loss of or change in existing green infrastructure, including potential loss of important or historic hedgerows and existing greenspace.	Information on general rather than detailed loss is provided in the documentation.	Detailed plans showing extent of vegetation loss.	Likely
<b>Biodiversity and ecology</b>				
67	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	GAL should quantify losses and replacement habitat in the Ecology chapter for the ES. Additional compensation is	Likely

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		<p>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 – 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>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 / enhancement is proposed.</p>	
68	Bat roost surveys of trees have not been undertaken	<p>The ecology chapter for the ES states:  <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. ODPM circular 06/2005 states:</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>Surveys are required to inform impacts and mitigation / compensation for roosting bats.</p>	Unlikely given survey timing restrictions

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		<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, <b>is established before the planning permission is granted</b>, 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 circumstances, with the result that the surveys are carried out after planning permission has been granted'.</i></p>		
69	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"> <li>• 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.</li> <li>• No methodology or timings information for the mitigation strategies.</li> </ul>	More detail required on proposed receptor sites and outline mitigation strategies for reptiles and GCN should be provided.	Likely
70	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	Replacement ponds should be provided off-site – preferable	Uncertain

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		airstrike safety. This is fully justified however, it is not understood why off-site provision of new ponds has not been considered.	within the nearby Biodiversity Opportunity Areas to maximise ecological opportunities / outcomes.	
71	Longbridge Roundabout Mitigation area (Gatwick Dairy Farm)	Clarification is required as to what the legal mechanism will be adopted for the management and maintenance of Longbridge Roundabout Mitigation area (Gatwick Dairy Farm). It is assumed that land will be compulsory purchased and all future management and maintenance of the land would be the responsibility of GAL.	Clarification required on legal mechanism for management and maintenance of Longbridge Roundabout Mitigation area (Gatwick Dairy Farm)	Likely
72	Biodiversity Net Gain (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 would achieve net gain as the baseline value which has been used does not include all habitats within the DCO application site.	Likely
73	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.	GAL should adopt a landscape scale approach to assessing and addressing ecological impacts, including the need to provide off site mitigation, compensation and BNG. SCC would expect enhancements to green corridors and improved	Uncertain

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		Maintenance of habitat connectivity across the airport and wider landscape remains a concern.	habitat connectivity to extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	
74	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 and Crawter's Brook.	Explore further opportunities for biodiversity enhancement, both within and outside the Site.	Uncertain
75	Security of long term positive management of the two existing 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 within the LEMP.	Likely
76	Gatwick Greenspace partnership	Continued support for the Gatwick Greenspace Partnership is proposed to be included within the new NRP Section 106 Agreement. Engagement is required with partners on proposals.	SCC wishes to be included in this continuation of the partnership. Greater detail is needed around level of contribution to the partnership and the priorities for biodiversity enhancement	Likely

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Carbon and Climate Change				
77	Legislation, policy and guidance - Impact of Emissions Trading Scheme (ETS)/CORISA.	It's not clear if GAL considers the impact of changes to ETS/CORISA in aviation forecasts used to develop the 'need case'.	Confirmation of whether the impact of ETS/CORISA changes have been taken into account?	Likely
78	Legislation policy and guidance - Consideration of UK Climate Change Committee (CCC) Progress in reducing emissions report	The latest Climate Change Committee Progress Report to Parliament published in June 2023 has identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero.	GAL needs to analyse and assess the issues raised by the CCC regarding the Jet Zero Strategy and consider in relation to the NRP and how this could compromise the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).	Likely
79	Baseline information review - GHG emissions from airport buildings and ground operations does not appear to include maintenance, repair, replacement or refurbishment emissions.	The scope of the GHG emissions arising from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment emissions. Therefore, this would under account the operational GHG emissions. It is not clear what is captured under "other associated businesses".	GAL needs to clarify if the maintenance, repair, replacement or refurbishment emissions were calculated within the GHG Assessment and, if not, justify why.	Likely
80	Assessment of significant effects - The ES fails to consider the risks raised by the CCC's expert advisory panel, which warns that the UK jet zero policy is non-compliant with the UK's net zero trajectory.	The CCC, in their latest progress in reducing emissions publication (June 2023) and previous publications, raised serious concerns over the UK Jet Zero policy as summarised in Page 267, 'Airport expansion' bullet point of the latest report <sup>1</sup> .	GAL needs to assess the concerns and the issues raised by the CCC regarding the Jet Zero Strategy and consider in relation to the NRP and how this could compromise the UK's net	Likely

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

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	<p>Therefore, it is considered that 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>zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p> <p>The Applicant needs to consider the issues raised in the UK Aviation Jet Zero strategy's judicial review and the CCC's concerns.</p>	
81	<p>Assessment of significant effects - no assessment of cumulative UK airport expansion emissions has been considered on how this will impact the UK's net zero trajectory</p>	<p>The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels<sup>2</sup>. This Figure is not up to date as Gatwick is proposing to increase its operating capacity to 80.2 million passengers per annum, which would make the total Figure &gt;150 million more passengers a year by 2050 relative to 2019 levels.</p> <p>As discussed above, airport expansion, demand management, and reliance on nascent technology are three key areas raised by the CCC that could jeopardise the UK's net zero trajectory. A significant increase of &gt;150 million</p>	<p>GAL needs to provide an updated cumulative assessment that considers the combined impact of all major UK airport expansions and how this could impact the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</p>	Likely

<sup>2</sup> <https://www.ft.com/content/52cdd536-103b-4db0-91c5-f1337be47baa>

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		passengers will greatly increase the UK's cumulative aviation emissions, which may have significant consequences on the UK's net zero trajectory.		
82	Assessment of aviation GHG emissions - It is not clear how or if GAL converted CO <sub>2</sub> emissions from aircraft to CO <sub>2</sub> e.	It is not clear if GAL undertook a conversion from CO <sub>2</sub> to CO <sub>2</sub> e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) <sup>3</sup> . If not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO <sub>2</sub> e in 2028 in the most carbon-intensive year where 5.327 MtCO <sub>2</sub> e was estimated to be released (Table 5.2.1).	GAL needs to confirm if a conversion was undertaken from CO <sub>2</sub> to CO <sub>2</sub> e? If not, the Applicant is required to update the GHG Aviation Assessment to account for this.	Likely
83	ES Chapter 15 Climate Change baseline - 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) (as detailed in paragraph 15.5.2), however, some asset components are assumed to be operational in perpetuity, and therefore these climate change projections are not adequately far enough into the future to represent the worst case scenario.	GAL should include additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are accounted for.	Likely
84	ES Chapter 15 Climate Change assessment of significant effects - 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.	GAL should undertake a more detailed identification/assessment of construction related climate risks and distinguish areas that are particularly vulnerable and may require specific adaptation measures to be in place.	Uncertain
85	ES Chapter 15 Climate Change assessment of significant effects -	The climate impact statements (Table 15.8.5 and Table 15.8.6 of ES Chapter 15 Climate Change) are lacking in	GAL should update all climate impacts statements to have a	Uncertain

<sup>3</sup> <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>



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	Inconsistency and lack of detail in some climate impact statements.	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.	clear end impact and so that all risks are articulated in a consistent way.	
86	ES Chapter 15 Climate Change mitigation, enhancement and monitoring - Lack of identification of additional mitigation / adaptation measures.	Whilst GAL 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.	GAL should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change. Detail will be required as to how they are secured.	Uncertain
87	ES appendix 15.5.2 Urban Heat Island Assessment - Mitigation measures should be proposed to reduce the impact of UHI effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	Uncertain
88	ES appendix 15.8.1 Climate Change Resilience Assessment - Inconsistency and lack of detail in some climate impact statements.	The impact statements are lacking in consistency in that some are missing an 'impact'. They have a cause and an 'event' but no end 'impact'. This end result is what should determine the consequence rating and may be why no risks are rated higher than a medium.	GAL should update all climate impacts statements to have a clear end impact and so that all are articulated in a consistent way. The risk ratings should then be revised accordingly.	Uncertain
89	ES appendix 15.8.1 Climate Change Resilience Assessment - Concerns regarding underestimation of risk.	Regarding Risk 7, there is a concern that the impacts could be more severe than just delays in fuelling i.e. reaching flashpoint of aviation fuel on extreme hot days could lead to combustion. Also given it has been suggested that there may be hydrogen usage for low emissions vehicles during	GAL should review the articulation of risk, impact and risk rating and revise where appropriate. Further consideration should be given to	Uncertain

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		construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.	climate risks associated with hydrogen storage and usage.	
90	ES appendix 15.8.1 Climate Change Resilience Assessment - Lack of consideration of storm events / wildfire / fog	Storm events are not considered sufficiently in this assessment. Wildfire is not mentioned as a possible climate hazard to impact the airport's operation. However, wildfires in the surrounding area, in particular the smoke they generate can impact airport operations. Risks associated with fog were not included in the risk assessment, however, fog can impact visibility and ability to perform day to day airport operations.	GAL should give further consideration to be given to storm events, wildfire and associated smoke and fog and risk description and rating to be reconsidered.	Likely
91	ES appendix 15.8.1 Climate Change Resilience Assessment - 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 and causing a power outage.	GAL should include risk and mitigation details regarding the climate change impact on critical airport equipment and infrastructure.	Likely
<b>Draft Development Consent Order</b>				
92	Revisions required to Article 22 Discharge of Water	Ordinary watercourses are not adequately addressed	Appropriate wording in relation to ordinary watercourses to be included	Uncertain
93	Revisions required to the definition of "commencement"	In particular, the implications arising from certain operations which fall outside that definition and which do not appear to be controlled (article 2(1), interpretation);	Revisions required	Uncertain
94	Article 3 (development consent etc. granted by Order)	Use of the wording "construct, operate and use"	Justification for drafting required	Uncertain
95	Article 9 (planning permission)	Confirmation required around which planning permission and conditions the applicant is concerned about	Justification required	Uncertain

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96	Agreements with highway authorities	The need for highway authorities to agree template agreements before the end of the Examination with the applicant under article 21 (agreements with highway authorities)	Discussions on agreements to be held	Likely
97	Consideration of Highway authority Lane Rental and Permit Scheme	The disapplication of several provisions of the New Roads and Street Works Act 1991 without the application of the relevant highway authority's permit scheme (article 10; application of the 1991 Act)	Revisions required	Uncertain
98	Street works	The way in which street works are controlled under article 11 (street works)	Revisions required	Uncertain
99	Deeming provisions	The inclusion of deeming provisions in articles 12(4) (power to alter layout, etc. of streets), article 14(8) (temporary closure of streets), 18(10) (traffic regulations), 22(5) (discharge of water), and 24(6) (authority to survey and investigate the land)	Revisions required	Uncertain
100	Alternative routes	The standard to which alternative routes must be provided under article 14(5) (temporary closure of streets)	Revisions required	Uncertain
101	New means of access	The proposal to allow the applicant to create new means of access without the street authority's consent under article 16 (access to works)	Revisions required	Uncertain
102	Traffic regulations	How the "instrument" referred to in article 18(6)(a)(traffic regulations) will be accessed	Revisions required	Uncertain
103	Article 25 which relates to trees and hedgerows	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	Revisions required	Uncertain
104	Article 31 (time limit for exercise of authority to acquire land compulsorily)	The usual period of five years is doubled. Further information about project complexity is required	Justification required	Uncertain

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105	Article 40 (special category land)	Timing of vesting of special category land	Justification for applicant's approach required	Uncertain
106	Inclusion of hotels as authorised development	Further justification requested in relation to inclusion of work nos 26, 27 and 28 as authorised development	Justification required	Uncertain
107	Drafting of requirements in Schedule 2	including: the drafting of "start date" (R.3(2) (time limits and notifications); the 14-day notification period in R3(2); why some documents must be produced "in accordance with" the certified documents and others must be produced either "in general accordance" or "in substantial accordance" with them; the drafting of R.14 (archaeological remains); and of those which concern noise (e.g. R.15 (air noise envelope), R.18 (noise insulation scheme)); the ambiguous drafting and omissions in R.19 (airport operations);	Revisions required	Uncertain
108	Schedule 11 (procedure for approvals, consents and appeals)	the 8-week for determining significant applications	Revisions required	Uncertain
109	DCO schedules and plans	Amendments required to address inconsistencies and errors	Revisions required	Likely
110	Finalisation of Section 106 Agreement	Negotiation on the S106 has not yet started	Discussions to commence	Uncertain