



Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Crawley Borough Council

Book 10

VERSION: 1.0

DATE: MARCH 2024

Application Document Ref: 10.1.1

PINS Reference Number: TR020005

Table of Contents

1	Introduction	3
2	Current Position	5
2.1.	Agricultural Land Use and Recreation	5
2.2.	Air Quality	9
2.3.	Capacity and Operations	19
2.4.	Climate Change	20
2.5.	Construction	26
2.6.	Cumulative Effects and Interrelationships	28
2.7.	Draft DCO and Explanatory Memorandum	29
2.8.	Ecology and Nature Conservation	39
2.9.	Forecasting and Need	44
2.10.	Geology and Ground Conditions	45
2.11.	Greenhouse Gases	46
2.12.	Health and Wellbeing	52
2.13.	Historic Environment	58
2.14.	Landscape, Townscape and Visual	62
2.15.	Major Accidents and Disasters	68
2.16.	Noise and Vibration	69
2.17.	Planning and Policy	81
2.18.	Project Elements and Approach to Mitigation	82
2.19.	Socio-Economics and Economics	93
2.20.	Traffic and Transport	109
2.21.	Waste and Materials	117
2.22.	Water Environment	118
3	Signatures	124
	Appendix 1: Record of Engagement Undertaken	125

1 Introduction

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in support of the examination phase for the proposed Gatwick Northern Runway Project (NRP). The Application was made by Gatwick Airport Limited (the Applicant) to the Secretary of State for the Department for Transport (the Secretary of State) pursuant to Section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The Application comprises alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. It also includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput capacity. This includes substantial upgrade works to certain surface access routes which lead to the airport. A full description of the Proposed Development is included in **ES Chapter 5: Project Description** (Doc Ref. 5.1).
- 1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the Examination. The purpose and possible content of SoCG is detailed in the Department for Communities and Local Government's guidance entitled 'Planning Act 2008: examination of applications for development consent' (2015), stating:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*
- 1.1.4 The SoCGs between the Applicant and the local authorities comprises several documents, to which this document is one. The Statement of Commonality provides details of the structure and status of the SoCG between all the relevant Interested Parties, including the local authorities. Naturally, the level of detail across the suite of SoCG varies to reflect the nature and complexity of the matter, as well as the position between the parties.
- 1.1.5 This document solely relates to matters between the Applicant and Crawley Borough Council. A summary of the meetings and correspondence that has taken place between the parties is detailed in **Appendix 1** of this document.
- 1.1.6 The engagement between the parties across the breadth of matters is ongoing. Therefore, the SoCG is an evolving document and the detailed wording within it is still being discussed in detail between the parties. Future iterations will be submitted at each deadline; and both parties reserve the right to supplement the matters identified as discussions progress, to ensure it is comprehensive and up to date.
- 1.1.7 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached, and is presented in a tabular form. This SoCG does not seek to replicate information that is available elsewhere, either within the Application and/or Examination documents, referring out where

appropriate. The terminology used within the SoCG to reflect the status between the parties is either:

- “Agreed” to indicate where a matter has been resolved to the satisfaction of the parties.
- “Not Agreed” to indicate a final position where parties cannot agree.
- “Under discussion” to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.

1.1.8 It can be assumed that any matters not specifically referred to in Section 2 of this SoCG are not of material interest or relevance to Crawley Borough Council; and therefore, have not been the subject of any discussions between the parties, or have been previously discussed and addressed through the DCO process. As such, those matters should be assumed to be agreed, unless otherwise raised in due course by any of the parties.

2 Current Position

2.1. Agricultural Land Use and Recreation

2.1.1 **Table 2.1** sets out the position of both parties in relation to agricultural land use and recreation matters.

Table 2.1 Statement of Common Ground – Agricultural Land Use and Recreation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	GAL Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
2.1.3.1	Quality of and impacts upon existing recreational routes affected by the DCO works during and post construction	<p>Lack of detail on the impacts on existing recreational routes as result of the works and the measures proposed to protect users (e.g., lorry routing, dust, damage to surfacing). Lack of detail or acknowledgement of potential opportunities to enhance and improve these routes for benefit of local community and for promotion of active travel.</p> <p>Updated position (Deadline 1): These paragraphs, if referenced from the Issues Tracker, refer principally to improvements around Riverside Gardens and replacement Sussex Border path as a direct consequence of the project works. CBC remains concerned about the impacts on other recreational routes. Refer to LIR for further detail.</p> <p>PROW strategy - needs further detail refer to LIR.</p>	<p>Substantial active travel infrastructure improvements are proposed as part of the surface access works for the scheme as summarised above and as illustrated in Figure 12.6.2 in the ES Traffic and Transport Figures and the Surface Access Highways Plans – General Arrangements. These proposals have been developed with due consideration of the guidance set out in LTN 1/20 and the relevant LCWIPs including the Reigate and Banstead LCWIP (May 2022) and Crawley LCWIP (2021) as well as due consideration of the site context, usage numbers, broader active travel connectivity and route corridors and environmental considerations.</p> <p>With respect to the proposed active travel path connection between Longbridge Roundabout, North Terminal Roundabout and South Terminal (located on the western side of A23 London Road), the proposed solution comprises predominantly segregated path provision between Longbridge Roundabout and North Terminal Roundabout (with the exception of over the A23 London Road River Mole bridge) and shared use provision between North Terminal Roundabout and South Terminal.</p> <p>Segregated provision north of North Terminal Roundabout was considered to be warranted for a number of reasons including anticipated relatively high volumes of pedestrians travelling on this route between Car Park Y and North Terminal.</p> <p>The proposals for surface access improvements reflect refinements made following consultation responses and engagement with National Highways and local highway authorities regarding junction layouts and active travel routes for pedestrians and cyclists. ES Chapter 5: Project Description, Section 5.2.109 describes the improvements to Longbridge Junction and the A23 London Road, including provision of Active Travel. The</p>	<p>Para 4.4.7 of ES Appendix 19.8.1 Public Rights of Way Management Strategy [APP-215]</p> <p>Paragraphs 19.6.28-19.6.42 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]</p> <p>Section 19.8 and Paragraphs 19.9.18 to Paragraph 19.9.32 of ES Chapter 19 Agricultural Land Use and Recreation [APP-044]</p> <p>Rights of Way and Access Plans – For Approval [APP-018]</p> <p>ES Traffic and Transport Figures [APP-059]</p> <p>Surface Access Highways Plans – General</p>	Under discussion

			<p>Longbridge Roundabout layout is shown in the ES Appendix 5.2.1: Surface Access General Arrangement Plans.</p> <p>In respect of the Sussex Border Path, the proposed temporary diversions of PROW routes during construction have been developed to maintain safety for PROW users during construction. Additional details in relation to the management of temporary PROW diversions is set out in Section 4 of the Environmental Statement Appendix 19.8.1: Public Rights of Way Management Strategy. Further details in relation to the temporary diversion provisions will be developed in consultation with the local authorities through the construction stage post-DCO consent.</p> <p>A PROW management strategy document, secured as a Requirement in the Draft DCO has been produced as part of the ES at Appendix 19.8.1 Public Rights of Way Management Strategy. The strategy describes the approach to managing the impacts on PROW because of the construction and operation of the Project to reduce disruption to users (as far as possible).</p>	<p>Arrangements [APP-020]</p>	
2.1.3.2	Replacement open space	<p>It is not clear the replacement open space land to be provided under article 40 (special category land) of dDCO, is appropriate. There is no assessment of the qualitative amenity benefit nor clarity on its function, purpose, use or management.</p> <p>Updated position (Deadline 1): Qualitative concerns remain. Discussion and agreement on the future management and timing of provision is sought, in conjunction with the Surrey authorities as part of the overall provision of replacement open space.</p>	<p>The Statement of Reasons, paragraphs 10.1.19 – 10.1.26 explains that:</p> <ul style="list-style-type: none"> 10.1.19 <i>The proposed areas of the replacement open space significantly exceed the area of public open space permanently lost. In total, approximately 1.95 ha of replacement land would be provided compared to a loss of approximately 1.16 ha. This provides an increase of approximately 0.79 ha (68%) of open space available to local communities.</i> 10.1.20 <i>The areas of replacement open space provided greatly exceed in quantity the land permanently acquired from each of Church Meadows and Riverside Garden Park (including the small parcel south of the A23 Brighton Road) individually. At Riverside Garden Park (including the aforementioned small parcel) a loss of 1.03 ha is replaced by 1.43 ha. In Church Meadows a loss of 0.13 ha is replaced by 0.52 ha.</i> 10.1.21 <i>The proposed locations of the areas of replacement open space are the closest available parcels of land to those areas that would be permanently lost. The proposed replacement open space considers access and connectivity with the existing areas of open space with pedestrian connections and NCR21.</i> 	<p>Statement of Reasons [AS-008]</p>	Under discussion

			<ul style="list-style-type: none"> • 10.1.22 The proposals include the provision of a pedestrian and cyclist ramp close to the River Mole to provide a new access into the northern part of Riverside Garden Park. This would enable the public to enter and enjoy the full extent of the open space rather than having to follow the existing narrow footway alongside the A23 London Road before entering the park at the existing access further south. • 10.1.23 The areas of replacement open space would be available to the communities that the existing open space currently serves, including local residents, airport staff and visitors in locations as close as possible to the current provision. • 10.1.24 The replacement open space at Car Park B would provide large areas of accessible open space providing enhanced access to the Sussex Border Path and would include areas of woodland planting, similar to the nature of the wooded southern edge of Riverside Garden Park that would be permanently lost, as well as additional elements that reflect the nature and quality of the wider area of Riverside Garden Park including scrub and ground cover planting and open grassed areas for recreational use. As the landscaping develops over time, this would provide areas of open space that would be similar in nature to the central areas of Riverside Garden Park and more accessible and usable than much of the area lost, the majority of which falls within the highways boundary and contains highways ditches and wooded embankments together with an isolated piece of land that can only be accessed via a steep bank from the A23 Brighton Road. • 10.1.25 The replacement open space at Church Meadows is currently used to support a livestock-based farming enterprise. The current grassland use of the replacement land would enable the early establishment of a usable and attractive space, similar to the existing area of Church Meadows. The implementation of planting proposals in accordance with the principles set out in the ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) would further enhance the quality of the replacement open space as the landscaping develops. • 10.1.26 The replacement land is therefore land which is not less in area than the open space land to be acquired and is no less advantageous to the persons, if any, entitled to rights of common or other rights, and to the 		
--	--	--	--	--	--

			<i>public. It therefore satisfies section 131(4) and the definition in section 131(12) of the 2008 Act.</i>		
Mitigation and Compensation					
2.1.4.1	Appropriateness and adequacy of the proposed open space and recreation provision	Car Park B - Whether location is appropriate and lack of detail on the quality amenity benefit, function purpose, use and management. Updated position (Deadline 1): Please see LIR for further information.	The area of land around Museum Field does not form part of the proposed replacement open space. The areas of replacement open space are described in ES Chapter 19 Agricultural Land Use and Recreation, paragraphs 19.9.39 – 19.9.50. However, it is proposed that the public would have access to the area of landscape and ecological mitigation from the existing permissive access route along the west bank of the River Mole. In relation to the outline Landscape and Ecology Management Plan (oLEMP) for the Project, the obligations within this document are secured through a Requirement in the Draft DCO. Before work can commence on any part of the Project, a landscape and ecology management plan (LEMP) for that part must be submitted to and approved by the local planning authority. Those LEMPs must be in general accordance with the principles in the oLEMP.	ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-116] Draft Development Consent Order (Doc Ref. 2.1) ES Chapter 19 Agricultural Land Use and Recreation [APP-044]	Under discussion
2.1.4.2	Museum Field	Updated position (Deadline 1): Museum Field – quality of provision/ usability of space and connectivity with surroundings. Please see LIR for further information.	It is proposed that the public would have access to the area of landscape and ecological mitigation from the existing permissive access route along the west bank of the River Mole. The obligations within the outline Landscape and Ecology Management Plan (oLEMP) are secured through a requirement in the Draft DCO. Before work can commence on any part of the Project a landscape and ecology management plan (LEMP) for that part must be submitted to and approved by the local planning authority. Those LEMPs must be in general accordance with the principles in the oLEMP.	ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-116] Draft Development Consent Order (Doc Ref. 2.1)	Under discussion
2.1.4.3	Pentagon Field	It is not clear how the negative impacts on paths near Pentagon Field from soil deposition would be mitigated during the construction phase. Updated position (Deadline 1): It is unclear where this reference document is as it is not the issues tracker or APP-215. This matter is addressed in detail in the LIR	Pentagon Field is proposed to be used for the deposition of spoil from excavations within the Project and will then be restored to grassland which can be returned to its former agricultural use. During the works to deposit spoil, management measures may be required, in accordance with the principles in the PRow Management Strategy, to ensure that access to Footpath 359sy remains throughout the construction period.	ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215]	Under discussion
Other					
There are no other matters relevant to this topic in this Statement of Common Ground.					

2.2. Air Quality

2.2.1 Table 2.2 sets out the position of both parties in relation to air quality matters.

Table 2.2 Statement of Common Ground – Air Quality Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
2.2.1.1	Air Quality and Emissions Mitigation Guidance for Sussex	<p>The applicant has not clearly demonstrated regard to the Sussex Air Quality and Emissions Mitigation Guidance or the Defra air quality damage cost guidance in assessing air quality impacts and mitigation measures. The health/damage costs are not included in the DCO documents despite confirmation from the applicant that they would be undertaking a TAG (Transport Analysis Guidance) assessment which would identify the air quality damage costs of the Project. The underlying rationale of the Sussex Guidance is to quantify health damage costs associated with the transport emissions from the proposed development (NO₂, M10/2.5) in order to offset these damages to protect human health. This approach is in line with the principals of Defra’s Clean Air Strategy.</p> <p>Updated position (Deadline 1): It is noted that an appraisal of air quality damages has been presented in Table 7.2.1 of Needs Case Appendix 1 – National Economic Impact Assessment (APP-251). It is also noted that measures to mitigate air quality have been identified.</p> <p>It is understood from the December TWG air quality meeting that an AQAP will be produced by GAL. Within this AQAP it is requested that GAL demonstrate how the overall monetary disbenefits identified will be redressed by the measures proposed. However, until the ExA accept the proposed changes, the LPAs are only able to comment on the DCO and documentation as submitted. As a matter of clarification it is noted that road traffic NO_x and PM_{2.5} Other on-site operations are predicted to improved, can GAL outline the source of this improvement?</p>	<p>The approach taken for the ES is consistent with the principles of the Clean Air Strategy and guidance set out in the Sussex Guidance; it follows requirements for EIA and NPSs; and provides detailed commitments for suitable mitigation to be secured through the DCO.</p> <p>Table 7.2.1 of Needs Case Appendix 1 – National Economic Impact Assessment includes the TAG assessment identifying the air quality damage costs of the Project.</p> <p>Table 13.4.1 of ES Chapter 13: Air Quality considers the Sussex Guidance.</p> <p>The air quality assessment (APP-038) has indicated that there are no significant effects as a result of the Project and the Project is not predicted to impact compliance with the air quality standards.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality (APP-038) sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Updated position (Deadline 1): GAL will provide a draft Outline AQAP to the LAs by 26th March (to align with Deadline 2), with the intention of submitting an Outline AQAP into the Examination in due course taking account of any feedback from the LAs.</p>	<p>Table 7.2.1 of ES Needs Case Appendix 1 – National Economic Impact Assessment [APP-251]</p> <p>Table 13.4.1 and Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>Section 13.9 of ES Chapter 13: Air Quality [APP-038]</p>	Under discussion
2.2.2.2	Uncertainty and Controlled Growth	<p>There is insufficient information and a lack of sensitivity testing to clearly demonstrate how differing levels of modal shift attainment could impact future air quality predictions. CBC has concerns over whether the modal shift can be achieved, and if this is not achieved what the air quality effects may be.</p> <p>Updated position (Deadline 1): The applicant response has not provided sensitivity testing in relation to air quality. Therefore, uncertainty remains for air quality as to how sensitive predictions presented are to the</p>	<p>The mode share commitments within the Surface Access Commitments (SACs) document represent the position GAL is confident it can achieve, based on the modelling of mode choice and transport network operation. Further details are provided in Chapter 7 of the Transport Assessment.</p> <p>The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application.</p>	<p>ES Chapter 7 Transport Assessment [AS-079]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion

		<p>success of mode shift. Additionally, whilst there are provisions to monitor mode shift it is unclear what actions would be taken if mode shift was not identified, what air quality triggers would be used and what control measures would be applied.</p>	<p>The SAC also includes a section on GAL's further aspirations, which includes more ambitious mode share targets which it will be working towards, but it has set the committed mode shares explicitly to ensure that the core surface access outcomes set out in Environmental Statement are delivered. The SAC contains measures to monitor and ensure that the mode commitments are met.</p> <p>Conservative assumptions have also been built into the air quality assessment to reduce uncertainty in any future scenario such as background values being frozen to 2030 and no improvements in aircraft emissions being accounted for in the air quality modelling.</p> <p>The assessment of air quality is measured against the relevant air quality standards. The draft Section 106 Agreement includes commitments to monitoring of air quality at current and proposed monitoring sites against relevant air quality standards. Results will be reported to local authorities.</p> <p>Updated position (Deadline 1): A sensitivity test with the conservative assumption that there are no improvements in emissions beyond 2030 has been provided a Deadline 1, within Appendix F of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p> <p>GAL will provide a draft Outline AQAP to the LAs by 26th March (to align with Deadline 2), with the intention of submitting the Outline AQAP into the Examination in due course taking account of the LAs feedback.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix F of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p>	
<p>2.2.2.3</p>	<p>Assessment Scenarios (including 2047 Full Capacity)</p>	<p>The scenarios assessed in Chapter 13 of the ES (Listed para13.5.23) do not provide a realistic worst-case assessment. This is particularly the case for those scenarios where both construction and operational activities are underway at the same time, but the assessment has treated them separately.</p> <p>The same concerns apply to the emissions ceiling calculations as to how realistic these are, particularly when there are construction and operational activities ongoing, and the emissions ceiling calculations treat these separately.</p> <p>In addition, there is no operational assessment for the final full-capacity assessment year of 2047, as per ANPS (para 5.33) which identifies the need to include assessment when at full capacity.</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>Conservative assumptions being applied in the assessment include background values being frozen to 2030 and no improvements in aircraft emissions being accounted for in the air quality modelling.</p> <p>Traffic modelling has been undertaken for two construction scenarios, airfield construction and surface access (highways)</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Chapter 7 Transport Assessment [AS-079]</p> <p>Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4)</p>	<p>Under discussion</p>

		<p>Updated position (Deadline 1): It is welcomed that GAL propose to provide further information at the next air quality TWG. However, until the ExA accept the proposed changes, the LPAs are only able to comment on the DCO and documentation as submitted. This matter will remain under discussion.</p>	<p>construction. Further detail is contained in Report 7.4 of the Transport Assessment (AS-079). The construction scenarios assume the peak construction traffic flows applied to the first year of airfield (2024) and surface access (2029) construction which is a conservative assumption since emissions and background concentrations are anticipated to improve in future years.</p> <p>As set out in paragraph 13.5.53 of ES Chapter 13: Air Quality, the 2029 surface access construction scenario represents years 2029-2032, during which there will be an overlap with the operation of the Project. The 2029 surface access construction scenario is a combined scenario considering the contribution from both construction and operational traffic over this period to represent a realistic worst case assessment.</p> <p>An assessment of 2047 has been included in ES Chapter 13: Air Quality with an emissions inventory (Table 13.10.8), including aircraft and road vehicle emissions. The air quality assessment concludes that no significant effects for air quality are anticipated for 2047. Between 2038 and 2047 a number of predicted improvements to air quality would be expected to occur as a result of national efforts to reduce emissions and also as a result of the project.</p> <p>Background concentrations are expected to reduce between 2038 and 2047 and vehicle emissions would continue to reduce. Road traffic is the main source of emissions likely to result in an impact from the project due to the proximity of road sources to sensitive receptors, compared with aircraft emissions. Therefore, despite the uncertainty of predicting emissions for a future year of 2047, it has been concluded that the 2047 future year is not at risk of resulting in a significant impact to air quality.</p> <p>Section 13.10.163 of the assessment provides further detail.</p> <p>Updated position (Deadline 1): GAL has set out the model scenarios within Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p>		
<p>2.2.2.4</p>	<p>Technical Details</p>	<p>There are concerns that a realistic worst case has not been assessed due to insufficient information or clarity on a range of technical details in the ES and associated documents, including how modelled work using ADMS/ADMS Airports is presented.</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 13.4.1: Air Quality Assessment</p>	<p>Under discussion</p>

		<p>Updated position (Deadline 1): Engagement to date has been welcome and that GAL propose to provide further information. However, until the ExA accept proposed changes, the LPAs are only able to comment on the DCO and documentation as submitted.</p> <p>In relation to verification it is unclear where agreement on the use of 2018 was secured as the verification year.</p>	<p>available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>GAL engaged with key stakeholders through the topic working groups and during such engagement, efforts were made to gain agreement with local authorities on key modelling points. Methodology transparency has been demonstrated and model files and results were provided to the TWG via email on 18th August 2023.</p> <p>Details on the Non Road Mobile Machinery (NRMM) (asphalt plant, concrete batching etc) and how it has been assessed can be found in Section 3.12 of the air quality assessment methodology.</p> <p>Details on the airport heating plant and road traffic modelling and how they have been assessed can be found in the air quality assessment methodology in ES Appendix 13.4.1.</p> <p>Full details of the model verification process are included in Section 3 within the ES Appendix 13.6.1.</p> <p>The baseline year of 2018 was selected based on traffic and monitoring data availability and was discussed and agreed to be used with the local authorities through the PEIR and at TWG meetings. This provides a reference level against which any potential changes in air quality can be assessed. Paragraph 13.5.18 of air quality assessment provides full details of the selected baseline year.</p> <p>GAL is happy to liaise with the local authorities on any further information that is requested.</p>	<p>Methodology [APP-158]</p> <p>ES Appendix 13.6.1 Air Quality Data and Model Verification [APP-159]</p>	
<p>Assessment</p>					
<p>There are no issues relating to the assessment for this topic within this Statement of Common Ground.</p>					
<p>Mitigation and Compensation</p>					
<p>2.2.4.1</p>	<p>Air Quality Action Plan (AQAP)</p>	<p>No AQAP has been provided which clearly sets out a range of measures to specifically address local air quality. Instead, the applicant has addressed air quality through the carbon action plan (CAP) and the airport surface access strategy (ASAS).</p> <p>This approach differs from discussions during 2 years of consultation where a draft AQAP was provided in the air quality TWG (21.10.22) and an AQAP was listed in item 19 of Schedule 2 (Requirements) of the draft DCO (28.04.23).</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p>	<p>Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p>	<p>Under discussion</p>

		<p>The CAP and ASAS do not specifically or adequately address air quality mitigation measures based on health, and both lack the means to measure short-term exposure or provide monitoring to check compliance. CBC has concerns that the lack of a dedicated AQAP will undermine its ability to fulfil its own LAQM requirements and is not consistent with Defra's Air Quality Strategy.</p> <p>Updated position (Deadline 1): This response does not align with the commitment provided by GAL in the December 2023 Air Quality TWG to provide an AQAP. Please can GAL confirm this response out of date.</p>	<p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the Requirements of the Draft DCO.</p> <p>The Carbon Action Plan sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access emissions are set out in the Surface Access Commitments.</p> <p>Measures and monitoring commitments will be secured via the DCO and Section 106 agreement. The commitments will provide suitable monitoring to allow for the LAs to carry out their LAQM requirements.</p> <p>Updated position (Deadline 1): GAL will provide a draft Outline AQAP to the LAs by 26th March (to align with Deadline 2), with the intention of submitting the Outline AQAP into the Examination in due course taking account of any feedback received.</p>	<p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>Draft Development Consent Order (Doc Ref. 2.1)</p>	
<p>2.2.4.2</p>	<p>Dust Management Plan (DMP)</p>	<p>No DMP has been provided which clearly sets out specific mitigation measures to ensure potential adverse impacts from construction dust are avoided during all construction stages.</p> <p>Updated position (Deadline 1): It is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared. This is still requested.</p>	<p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix 13.8.1 Construction Period Mitigation and are included in the Code of Construction Practice (CoCP), to be secured under a Requirement of the Draft DCO.</p> <p>Paragraph 2.2.7 of the CoCP sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP.</p> <p>Management plans will be prepared for specific areas of the Project to reflect any site-specific conditions or measures to mitigate dust impacts (set out in para 5.8.2 of the CoCP).</p> <p>The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing, as confirmed in paragraph 5.8.2 of the CoCP.</p> <p>Updated position (Deadline 1): A note explaining the draft Outline CDMP will be shared with CBC for comment by 26th March</p>	<p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>Draft Development Consent Order (Doc Ref. 2.1)</p>	<p>Under discussion</p>

			(to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.		
2.2.4.3	Construction Traffic Management Plan (CTMP)	<p>Section 6.5 of the CTMP (Restrictions and Monitoring) identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. However, no details on this monitoring system are provided to help understand how this would protect air quality. It is also unclear if the plan takes into account additional traffic associated with the natural growth of airport traffic, or additional traffic growth associated with the additional capacity already created in the first phase of construction.</p> <p>Updated position (Deadline 1): The cross reference is unclear, please can GAL confirm which document is being referred to? It is also still unclear what the monitoring system refers to nor if the traffic data used to develop the oCTMP includes the additional operational traffic from the partially open development.</p>	<p>The purpose of the oCTMP is to set out measures to manage construction traffic during the construction of the Project. Section 6.7 of the oCTMP sets out how the construction traffic will be managed taking out of the surface access improvement works.</p> <p>The airfield and highway construction traffic has been assessed and this is set out in Chapter 15 of the Transport Assessment. The assessment scenarios includes airport growth in the future baseline scenario (i.e. without Project) for the airfield construction, and vehicle trips associated with the Project in the highway construction scenario.</p>	<p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>Chapter 15 of the Transport Assessment [AS-079]</p> <p>ES Appendix 5.3.2 Code of Construction Practice – Annex 3: Outline Construction Traffic Management Plan [APP-085]</p>	Under discussion
2.2.4.4	Operational Air Quality Monitoring	<p>CBC has concerns regarding the measurement accuracy of the AQ Mesh low-cost sensors which the applicant is proposing to use to monitor operational phase impacts. AQ Mesh monitors are not approved by Defra for the monitoring of air quality in line with Local Air Quality Monitoring guidelines (equivalence reference method criteria for continuous monitoring) particularly with regards to short term level exceedances. As such they are not sufficient to demonstrate compliance with air quality standards. This introduces uncertainty on how air quality will be evaluated and reported to the council, which in turn reduces transparency on the effectiveness of measures relied upon to improve air quality.</p> <p>Updated position (Deadline 1): Further discussions on operational monitoring and the S106 are proposed to resolve this matter.</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO₂, PM₁₀ and PM_{2.5}) and the impacts from the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occur as a result of airport activity.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p>	Under discussion

			<p>GAL has worked with Local Authorities over many years to fund air quality monitoring to understand air quality locally. As part of the Project, a commitment will be made in the draft Section 106 agreement to the continuation of current monitoring and additional monitoring at several proposed sites (Chapter 13 Figure 13.1.12) using a mixture of monitoring types, including another DEFRA equivalent reference monitor (reference MCERTS monitor) and indicative MCERTS monitoring equipment to be able to monitor key pollutants of concern. Compared to current monitoring, this approach increases the spatial and temporal collection of monitoring data to allow detailed assessment of ambient air quality. The approach is considered proportionate given the cost of monitoring equipment and the results of the ES which show there are no significant effects being predicted.</p> <p>Long term effects have been assessed in the air quality assessment. Based on the monitored and modelled annual mean concentrations, the impact of NO₂, PM₁₀ and PM_{2.5} are not considered to be at risk of exceeding the short term standards as outlined in Section 13.10 of the air quality assessment. Therefore, an assessment of short term effects was scoped out. This is in line with the guidance outlined within Defra LAQM Technical Guidance (2022).</p> <p>Future air quality concentrations will be monitored and reported to the local authorities.</p>		
2.2.4.5	Funding for Local Ambient Air Quality Monitoring	<p>The ES does not specifically identify which of the existing LA continuous air quality monitoring stations on and around the airport will be funded. The LAQM process requires a LA with a major airport in its district to carry out an assessment of sensitive receptors within 1000m of the airport. Therefore CBC has an air quality monitoring station located on the eastern perimeter of the airport to provide independently measured pollution data for this assessment for Crawley residents living close to the airport who are impacted by airport emissions.</p> <p>Updated position (Deadline 1): Further discussions on operational monitoring and the S106 are proposed to resolve this matter.</p>	<p>The assessment in Section 13.9 of ES Chapter 13 Air Quality summarises the proposed operational phase air quality monitoring.</p> <p>The draft Section 106 agreement proposes to commit to supporting local authorities with carrying out monitoring at existing sites RG1, RG2 and RG3.</p> <p>GAL has worked with Local Authorities over many years to fund air quality monitoring to understand air quality locally. As part of the Project, a commitment will be made in the draft Section 106 agreement to additional monitoring at several proposed sites (Chapter 13, Figure 13.1.12) using a mixture of monitoring types. Compared to current monitoring, this approach increases the spatial and temporal collection of monitoring data to allow detailed assessment of ambient air quality. The approach is considered proportionate given the cost of monitoring equipment and the</p>	Section 13.9 of ES Chapter 13 Air Quality [APP-038] .	Under discussion

			results of the ES which show there are no significant effects being predicted.		
2.2.4.6	Ultrafine Particles (UFPs)	<p>The discussion on the health impacts of ultrafine particles (UFPs) from aviation sources within the ES (Chapter 18 para 18.8.66) is welcomed. However, although the applicant supports the monitoring of UFPs and commits to participating in national industry body studies of UFP emissions at airports, it is unclear if their commitments extend to supporting a local monitoring study.</p> <p>Updated position (Deadline 1): This response does not address the request for involvement of GAL in undertaking or funding local ultrafine particulates monitoring.</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO₂, PM₁₀ and PM_{2.5}) and the impacts from the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occur as a result of airport activity.</p> <p>GAL has worked with Local Authorities over many years to fund air quality monitoring to understand air quality locally. As part of the Project, a commitment will be made in the draft Section 106 agreement to additional monitoring at several proposed sites (Chapter 13 Figure 13.1.12) using a mixture of monitoring types. Compared to current monitoring, this approach increases the spatial and temporal collection of monitoring data to allow detailed assessment of ambient air quality. The approach is considered proportionate given the cost of monitoring equipment and the results of the ES which show there are no significant effects being predicted.</p> <p>In addition to monitoring key pollutants GAL commits to participating in national aviation industry body studies of UFP emissions at airports including those reviewing how monitoring could be undertaken, as discussed in the Health and Wellbeing assessment.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]</p>	Under discussion
2.2.4.7	Monitoring effectiveness of CTMP and CWTP	There is a lack of information on the monitoring of the effectiveness of the CTMP and CWTP to understand how any deviation from the plans will be addressed to protect air quality.	This approach taken for the ES is consistent with the principles of the Clean Air Strategy and guidance set out in the Sussex Guidance; it follows requirements for EIA and NPSs; and provides	Table 7.2.1 of ES Needs Case Appendix 1 – National Economic	Under discussion

		<p>Updated position (Deadline 1): The response does not address the initial question on how monitoring will be used to identify any deviation from the effects predicted in the ES.</p>	<p>detailed commitments for suitable measures to be secured through the DCO.</p> <p>Table 7.2.1 of Needs Case Appendix 1 – National Economic Impact Assessment includes the TAG assessment identifying the air quality damage costs of the Project.</p> <p>Table 13.4.1 of ES Chapter 13: Air Quality considers the Sussex Guidance.</p> <p>The air quality assessment undertaken in ES Chapter 13: Air Quality has indicated that there are no significant effects as a result of the Project and the Project is not predicted to impact compliance with the air quality standards.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>	<p>Impact Assessment [APP-251]</p> <p>Table 13.4.1 and Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p>	
<p>2.2.4.8</p>	<p>Construction Traffic Management Plan (CTMP)</p>	<p>Section 6.5 of the CTMP (Restrictions and Monitoring) identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. However, no details on this monitoring system are provided to help understand how this would protect air quality. It is also unclear if the plan takes into account additional traffic associated with the natural growth of airport traffic, or additional traffic growth associated with the additional capacity already created in the first phase of construction.</p> <p>Updated position (Deadline 1): It is considered this should be covered in the Air Quality discussions, and moved to that section of the SoCG.</p>	<p>The detailed Construction Traffic Management Plan will be prepared in collaboration with Local Authorities and National Highways during the detailed design and pre-construction stages, in accordance with the Outline Construction Traffic Management Plan. This secured via Requirement 12 of the Draft DCO.</p> <p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, no mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under a Requirement of the Draft DCO.</p>	<p>Draft Development Consent Order [AS-004]</p> <p>ES Appendix 5.3.2 Code of Construction Practice – Annex 3: Outline Construction Traffic Management Plan [APP-085]</p> <p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>ES Chapter 13 Air Quality [APP-038]</p>	<p>Under discussion</p>

Other					
2.2.5.1	CARE Facility	<p>There were continuous issues with odour from the current small waste incineration plant at the CARE facility until it was “mothballed” in 2020. The odour was mainly associated with the biomass fuel which produced a sweet-smelling aromatic hydrocarbon odour. There are concerns that this may be repeated at the new CARE facility which proposes to double in size.</p> <p>Updated position (Deadline 1): It is welcomed that the CARE facility will no longer include combustion sources. However, until the ExA accept the proposed changes, the LPAs are only able to comment on the DCO and documentation as submitted. Further discussion is proposed on the best practice odour controls proposed and how these will be documented and agreed.</p>	<p>ES Chapter 13: Air Quality provided an assessment of the CARE facility based on the current outline design parameters in ES Chapter 5: Project Description.</p> <p>Odour risk would be managed following best practice waste handling procedures. Following best practice methodology to contain and reduce odour effects from the facility, no significant impacts would occur.</p> <p>Notwithstanding this, the Applicant has put forward a change to the DCO Application to remove the boilers from the CARE facility (note the CARE facility will still exist in the DCO application but will be a waste sorting facility only).</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Chapter 5 Project Description (Doc Ref. 5.1)</p>	Under discussion

2.3. Capacity and Operations

2.3.1 Table 2.3 sets out the position of both parties in relation to capacity and operations matters.

Table 2.3 Statement of Common Ground – Capacity and Operations Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>Please see the joint Statement of Common Ground prepared in relation to Capacity and Operations (Doc Ref. 10.1.18).</i>					

2.4. Climate Change

2.4.1 Table 2.4 sets out the position of both parties in relation to climate change matters.

Table 2.4 Statement of Common Ground – Climate Change Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
Assessment Methodology					
2.4.2.1	Time periods considered for climate change projections are not far enough into the future to represent the worst case scenario.	<p>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.</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant did undertake a thorough climate data gathering exercise sufficient to inform the assessment and meet planning requirements.</p>	<p>The most distant time period chosen for the assessment was 2050-2079 (2060s), not 2040-2069. This time period was selected to represent a reasonable worst-case scenario at the highest resolution that is available. The UKCP18 12km projections used within the assessment do not go beyond 2080. This dataset also includes a range of useful variables to support the assessment (e.g. the number of hot days). The probabilistic projections do not contain these variables. In addition to this, it is recommended by the Met Office that consistency is maintained between the time periods used within an assessment. The most pessimistic RCP scenario was also employed to provide an indication of potential worst-case scenario conditions. Climate projections up to 2100 are used in ES Chapter 12: Traffic and Transport and ES Chapter 11: Water Environment in accordance with DMRB guidance.</p>	<p>ES Chapter 12: Traffic and Transport [APP-037]</p> <p>ES Chapter 11: Water Environment [APP-036]</p>	Agreed
2.4.2.2	Lack of consideration of storm events.	<p>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-sussex65875840</p> <p>Updated position (Deadline 1): Response from the Applicant noted. The matter raised is considered to be adequately addressed. No further comment.</p>	<p>Storm events are considered through the inclusion of extreme rainfall (increased probability of extreme weather events (Risks 2, 13-15 in Appendix 15.8.1 Climate Change Resilience Assessment) and high winds (risks 18-21 in ES Appendix 15.8.1 Climate Change Resilience Assessment) within the assessment. The risks associated with these hazards have been assessed as medium. Additional information on changes in wind speeds can be found in Chapter 15 (Paragraph 15.5.28). Reductions in wind speeds are anticipated in winter and summer. Quantitative data on changes in lightning across the UK are not provided by UKCP18 at the 12km scale. A summary of the Met Office findings for changes in lightning flash rate across the UK is provided in ES Chapter 15 (Paragraph 15.5.27) which suggests that Gatwick can expect lightning frequency to increase during summer and spring and decrease during autumn. Risks 22 and 23 in ES Appendix 15.8.1 Climate Change Resilience Assessment provide information on the potential impacts, existing mitigation measures and risks associated with increased lightning strikes.</p>	<p>Risks 2, 13-15, 18-23 in Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]</p> <p>Paragraph 15.5.27 and 15.5.28 of ES Chapter 15 Climate Change [APP-040]</p>	Agreed

2.4.2.3	Lack of consideration of wildfire	<p>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</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant will update the SoCG with the newly available data.</p>	Additional data is now available for wildfire that was not available at the time of submission of the DCO application. GAL will put more detail about wildfire in the next iteration of SoCG.	n/a	Under discussion
2.4.2.4	Lack of consideration of fog	<p>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.</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant will update the SoCG to add in detail on fog.</p>	GAL will put more detail about fog into the next iteration of the SoCG.	ES Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]	Under discussion
Assessment					
2.4.3.1	Identification of construction risks is limited.	<p>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.</p> <p>Updated position (Deadline 1): Whilst more detail could be added to the construction impacts identified, the Applicant's assessment of construction impacts does constitute a robust assessment that meets the planning requirements and the work undertaken is consistent with the relevant local council's policies regarding climate change.</p>	In addition to the information provided in Table 15.8.5 of ES Chapter 15 Climate Change (APP-040), further information on the identified construction risks is provided in Table 2.1.1 of Appendix 15.8.1 Climate Change Resilience Assessment (APP-187). These risks consider the impact of the increased numbers of extremely hot days and the range of risks covered by the increased probability of extreme weather events including heatwaves and flooding. However, appropriate mitigation measures are in place to mitigate these hazards and risks. These are detailed within the ES Appendix 5.2.3: Code of Construction Practice (APP-082) which details the methods in place to ensure construction can be sustained during adverse weather events. Several design measures are included to reduce the risk associated with flooding (e.g. avoiding temporary buildings and operation-critical building systems being in flood risk zones. This is to ensure that the delivery of the project will comply with appropriate environmental and health and safety legislation. The Gatwick Operations Adverse Weather Plan will also support continued construction during adverse weather events.	<p>Table 15.8.5 of ES Chapter 15 Climate Change [APP-040]</p> <p>Table 2.1.1 of ES Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p>	Agreed
2.4.3.2	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 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 anticipated impacts of climate change are provided for all risks identified within the CCRA. In Chapter 15 of the ES (Climate Change), this is included within Tables 15.8.5 and 15.8.6 within the 'Climate Change Impact' column and in Appendix 15.8.1 (Climate Change Resilience Assessment) within Table 2.1.1 in the 'Climate Change Impact' column.	<p>Tables 15.8.5 and 15.8.6 of ES Chapter 15 Climate Change [APP-040]</p> <p>Table 2.1.1 of ES Appendix 15.8.1</p>	Agreed

		<p>Updated position (Deadline 1): Whilst there are different approaches to undertaking climate change risk assessments, and further detail and clarity around impact statements would be helpful, the Applicant's assessment of operational impacts does however constitute a robust assessment that meets the planning requirements.</p>	<p>Risk ratings would not change following a clarification of specific impacts and therefore no material impact on the assessment will arise.</p>	<p>Climate Change Resilience Assessment [APP-187]</p>	
2.4.3.3	Inconsistency and lack of detail in some climate impact statements	<p>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.</p> <p>Updated position (Deadline 1): Whilst there are different approaches to undertaking climate change risk assessments, and further detail and clarity around impact statements would be helpful, the Applicant's assessment of operational impacts does however constitute a robust assessment that meets the planning requirements and the work undertaken is consistent with the relevant local council's policies regarding climate change.</p>	<p>The anticipated impacts of climate change are provided for all risks identified within the CCRA. In Chapter 15 of the ES (Climate Change) this is included within Tables 15.8.5 and 15.8.6 within the 'Climate Change Impact' column and in Appendix 15.8.1 (Climate Change Resilience Assessment) within Table 2.1.1 in the 'Climate Change Impact' column.</p> <p>Risk ratings would not change following a clarification of specific impacts and therefore no material impact on the assessment will arise.</p>	<p>Tables 15.8.5 and 15.8.6 of ES Chapter 15 Climate Change [APP-040]</p> <p>Table 2.1.1 of Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]</p>	Agreed
2.4.3.4	Identification of construction risks is limited.	<p>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.</p> <p>Updated position (Deadline 1): Whilst more detail could be added to the construction impacts identified, the Applicant's assessment of construction impacts does constitute a robust assessment that meets the planning requirements and the work undertaken is consistent with the relevant local council's policies regarding climate change.</p>	<p>In addition to the information provided in Table 15.8.5 of ES Chapter 15 Climate Change, further information on the identified construction risks is provided in Table 2.1.1 of Appendix 15.8.1 Climate Change Resilience Assessment. These risks consider the impact of the increased numbers of extremely hot days and the range of risks covered by the increased probability of extreme weather events including heatwaves and flooding. However, appropriate mitigation measures are in place to mitigate these hazards and risks. These are detailed within the ES Appendix 5.2.3: Code of Construction Practice which details the methods in place to ensure construction can be sustained during adverse weather events. Several design measures are included to reduce the risk associated with flooding (e.g. avoiding temporary buildings and operation-critical building systems being in flood risk zones. This is to ensure that the delivery of the project will comply with appropriate environmental and health and safety legislation. The Gatwick Operations Adverse Weather Plan will also support continued construction during adverse weather events.</p>	<p>Table 15.8.5 of ES Chapter 15 Climate Change [APP-040]</p> <p>Table 2.1.1 of Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p>	Agreed
2.4.3.5	Concerns regarding underestimation of risk.	<p>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 construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.</p>	<p>This risk is aligned with the most recent ARP3 report for Gatwick Airport. The existing procedures that are in place at Gatwick to minimise the risk of fuel combustion during hot weather will also take place during future operation. The airport will continue to adhere to the Airport Fire Service aspects embedded within Gatwick's Heat Plan, as set out in the Airside Operations Adverse Weather Plan (GAL, 2021) as required by the CAA regulations</p>	n/a	Agreed

		<p>Updated position (Deadline 1): It is acknowledged that the Applicant has sufficient existing controls in place to combat the risk of fuel combustion.</p>			
2.4.3.6	Disagree with the assessment that 'cumulative effects are not relevant'.	<p>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'.</p> <p>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.</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant did not assess for cumulative effects outside of the project site boundary, as the CCR only assessed those within this area.</p>	<p>The Zone of Influence considered within the cumulative effects assessment was the project site boundary for the CCR assessment. This does not include nearby projects therefore it was not relevant to assess the potential impact of additional projects on the UHI. The UHI effect was found to be low and therefore it would be unlikely that any nearby development would exacerbate this.</p>	<p>ES Chapter 15 Climate Change [APP-040]</p>	Agreed
Mitigation and Compensation					
2.4.4.1	Lack of identification of additional mitigation / adaptation measures	<p>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 resilience measures' which should also be included in this report.</p> <p>Updated position (Deadline 1): Whilst, it is acknowledged that the Applicant has outlined mitigation and adaptation measures for the project in the report and appendixes, in addition to referencing existing policies and plans in place at GAL, the DAS only includes indicative climate resilience design principles which are not reflected in the Control Document. Appendix 1 of the DAS.</p>	<p>Further adaptation measures are not formally identified (under the heading of 'further mitigation') as no significant risks were identified within the assessment which would require mitigation that is not already embedded within the Project. However, mitigation measures are included within relevant chapters/documents. The Code of Construction Practice (Appendix 5.3.2) includes an overview of relevant mitigation measures. This document is referenced within Chapter 15 of the ES (Climate Change). The Gatwick Airside Operations Adverse Weather Plan (GAL, 2021) sets out additional measures that should be followed during other extreme weather events. The Outline Climate Resilience Design Principles captured within the Design and Access Statement (Appendix A1) detail how elements of the design have been developed to account for climate change adaptation and would be implemented at the time of construction.</p> <p>A summary of mitigation measures/commitments made in relation to mitigation can be found in ES Appendix 5.2.3 Mitigation Route Map.</p> <p>Additionally, several mitigation measures are already embedded within the project. These are detailed within Table 15.8.4 and 15.9.1 in ES Chapter 15 Climate Change.</p>	<p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>Table 15.8.4 and 15.9.1 of ES Chapter 15 Climate Change [APP-040]</p> <p>Appendix A1 of the Design and Access Statement Volume 5 [APP-257]</p> <p>ES Appendix 5.2.3 Mitigation Route Map [APP-078]</p>	Not Agreed
2.4.4.2	Mitigation measures should be proposed to reduce the impact of UHI effect.	<p>The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures, e.g. additional</p>	<p>This statement in Paragraph 3.2.3 of Appendix 15.5.2 Urban Heat Island Assessment is not specific to the project, but refers to the UHI effect in urban centres more generally. The specific evaluation for the project is included in Section 3.3 'Evaluation of the Project'. It</p>	<p>Paragraph 3.2.3, Paragraph 3.3.2 and Section 3.3 of Appendix 15.5.2</p>	Under discussion

		<p>vegetation or water bodies could be proposed at this stage to minimise impacts.</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant will monitor UHI. It's also recommended that where feasible and appropriate additional UHI mitigation measures are incorporated.</p>	<p>is not expected that the Project could create a new UHI effect. However, increased impervious surface cover and buildings alongside projected climate change-induced increases in temperature could exacerbate the increase in the UHI effect. It is noted in Paragraph 3.3.2 of ES Appendix 15.5.2: Urban Heat Island Assessment that the risks associated with the UHI effect (which were assessed as medium) should be monitored.</p>	<p>Urban Heat Island Assessment [APP-186]</p>	
2.4.4.3	<p>Lack of identification of additional mitigation / adaptation measures. (Same concern as with the main report i.e Chapter 15 Climate Change)</p>	<p>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.</p> <p>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.</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant has outlined mitigation and adaptation measures for the project in the report and appendixes, in addition to referencing existing policies and plans in place at GAL.</p>	<p>Further adaptation measures are not formally identified (under the heading of 'further mitigation') as no significant risks were identified within the assessment which would require mitigation that is not already embedded within the Project. However, mitigation measures are included within relevant chapters/documents. The Code of Construction Practice (Appendix 5.3.2) includes an overview of relevant mitigation measures. This document is referenced within Chapter 15 of the ES (Climate Change). The Gatwick Airside Operations Adverse Weather Plan (GAL, 2021) sets out additional measures that should be followed during other extreme weather events. The Outline Climate Resilience Design Principles captured within the Design and Access statement (Appendix A1) detail how elements of the design have been developed to account for climate change adaptation and would be implemented at the time of construction.</p> <p>An additional summary of mitigation measures/commitments made in relation to mitigation can be found in Appendix 5.2.3 Mitigation Route Map (APP-078).</p> <p>Additionally, several mitigation measures are already embedded within the project. These are detailed within Table 15.8.4 and 15.9.1 in Chapter 15 of the ES (Climate Change).</p>	<p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>Table 15.8.4 and 15.9.1 of ES Chapter 15 Climate Change [APP-040]</p> <p>Design and Access Statement Volume 5 [APP-257]</p> <p>ES Appendix 5.2.3 Mitigation Route Map [APP-078]</p>	Agreed
2.4.4.4	<p>Insufficient detail on the climate change impact on critical airport equipment and infrastructure.</p>	<p>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?</p> <p>Updated position (Deadline 1): It is acknowledged that the Applicant has given consideration to the impact climate change could have on 'critical equipment and infrastructure', with subsequent mitigation measures being put in place, as well as consideration being given when new/upgraded products are required.</p>	<p>Electronic equipment is considered within the climate change resilience assessment (Appendix 15.8.1 Climate Change Resilience Assessment). Risks 6, 9 and 24 make reference to electronic equipment and the mitigation measures that are in place to ensure it remains operational. This equipment is designed to current temperature ranges based on existing standards and will be updated as part of business as usual operations. New/upgraded products would be sourced based on the latest available design standards.</p> <p>Risk 12 also highlights how HVAC equipment is designed to cope with extreme cold temperatures.</p>	<p>Risks 6, 9, 12, 15, and 24 of Appendix 15.8.1 Climate Change Resilience Assessment [APP-187]</p>	Agreed

		<p>It is acknowledged that the Applicant does not have the exact design of power and telecommunications equipment, but it's assumed that the appropriate mitigation measures identified will be applied to critical equipment</p>	<p>Risk 15 highlights risks associated with flooding of electrical equipment and mechanical operating mechanisms. The FRA sets out a Flood Resilience Statement and a Surface Access Drainage Strategy to increase flood storage capacity at site and reduce flood risk for all assets including electrical equipment. Power and telecommunications is incorporated within electronic equipment. At present, the exact design of power and telecommunications equipment is unknown and therefore the equipment was grouped into 'electronic equipment'. It is assumed that the appropriate mitigation measures identified will be applied to critical equipment.</p>		
<p>Other</p>					
<p><i>There are no other matters relevant to this topic in this Statement of Common Ground.</i></p>					

2.5. Construction

2.5.1 Table 2.5 sets out the position of both parties in relation to construction matters.

Table 2.5 Statement of Common Ground – Construction Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.5.1.1	Lack of detail on construction phasing	<p>Need for further understanding on sequencing and co-dependencies between the project elements to ensure appropriate phasing and control of the development and ensure mitigations in place.</p> <p>Updated position (Deadline 1): This matter relates to CBC concerns about controls in terms of the DCO drafting and requirements to ensure sequencing and triggers are appropriate to ensure mitigation etc.</p>	<p>The construction phasing information provided as part of the application is appropriate to the stage of the design.</p> <p>ES Chapter 5 Project Description provides details of the elements that comprise the Project and the construction phasing. Section 5.3 of ES Appendix 5.3.1 The Buildability Report Part A and Part B (Surface Access) provides additional information on the construction methodology and staging for airside, landside and surface access projects.</p> <p>Section 5.3 of ES Appendix 5.3.3 Indicative Construction Sequencing illustrates how construction will be phased.</p> <p>Further details of the programme and sequencing of the project will be developed during the detailed design and pre-construction stages of the Project.</p>	<p>ES Chapter 5 Project Description (Doc Ref. 5.1)</p> <p>ES Appendix 5.3.1 Buildability Report Part 1 [APP-079]</p> <p>ES Appendix 5.3.3: Indicative Construction Sequencing [APP-088]</p>	Under discussion
2.5.1.2	CoCP and OCTMP	<p>Concern about the lack of detail and clarity in the CoCP and CTMP, including no information regarding the criteria when and how much contingency routes will be able to be used.</p> <p>Updated position (Deadline 1): Still a lack of detail and clarity on contingency routes, which could be required for a considerable period when works are taking place on the motorway spur, and could affect residential areas. Also, CBC cannot find information on traffic movements to Pentagon Field.</p>	<p>ES Appendix 5.3.2 CoCP Annex 3 Outline Construction Traffic Management Plan sets out the proposed approach for managing construction traffic during the construction of the Gatwick Airport Northern Runway Project (the Project).</p> <p>As stated in the oCTMP, Junction 9 of the M23 will be the main construction access point. From Junction 9, the M23 Spur leads directly to Airport Way, which serves as the entrance and exit to the airport via the South and North Terminal roundabouts.</p> <p>As a contingency for the above primary access and to ensure resilience, Junction 10 of the M23 could be used as an alternative access. A23 London Road, A23 Brighton Road and the A2011 are other significant roads that provide connections to the airport for the construction traffic from the north and south, in the event that the primary access is impaired.</p> <p>The detailed Construction Traffic Management Plan will be prepared in collaboration with Local Authorities and National Highways during the detailed design and pre-construction stages.</p>	<p>ES Appendix 5.3.2 Code of Construction Practice (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2 Code of Construction Practice – Annex 3: Outline Construction Traffic Management Plan [APP-085]</p>	Under discussion

2.5.1.3	OCWTP	<p>The Outline Construction Workforce Travel Plan (OCWTP), whilst promoting positive measures to influence travel behaviour, lacks detail and firm commitments. Further clarification is required.</p> <p>Updated position (Deadline 1): Further information is required to enable CBC to understand how this is to be delivered.</p>	<p>The construction workforce travelling to and from the Airport will be managed in accordance with a Construction Workforce Travel Plan (CWTP), which will be developed by GAL and its contractors generally during detailed design / pre-construction stage in accordance with the Outline Construction Workforce Travel Plan (oCWTP) (ES Appendix 5.3.2) in consultation with the relevant highway authority and the National Highways.</p>	<p>ES Appendix 5.3.2 Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan [APP-084]</p>	<p>Under discussion</p>
---------	-------	--	--	--	-------------------------

2.6. Cumulative Effects and Interrelationships

2.6.1 Table 2.6 sets out the position of both parties in relation to cumulative effects and interrelationships matters.

Table 2.6 Statement of Common Ground – Cumulative Effects and Interrelationships Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
2.6.3.1	Lack of support for the Crawley Western Multi-Modal Transport Link	<p>The Transport Assessment, shows cumulative adverse impacts on local roads, particularly within the western neighbourhoods of Crawley. GAL's support for the Crawley Western Multi-modal Transport Link is necessary to alleviate this future impact.</p> <p>Updated position (Deadline 1): Consider support for the Western Multi-modal Transport link still necessary to address cumulative impact of development within Crawley, the new strategic development West of Ifield now identified in Horsham District Council's Regulation 19 Local Plan, and the Gatwick DCO.</p>	<p>The future year scenarios contain infrastructure with an uncertainty level of 'near certain' or 'more than likely'. This follows TAG guidance set out in TAG unit M4 'Forecasting Uncertainty'. Development and infrastructure which is considered less certain is not included in the future year scenarios for either future baseline or with Project. This and the forecasting assumptions are summarised in Chapters 6 to 8 of the Transport Assessment and set out in detail in Chapters 6 to 8 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment.</p>	ES Chapter 7 Transport Assessment [AS-079]	Not Agreed
Mitigation and Compensation					
There are no issues relating to the mitigation and compensation for this topic within this Statement of Common Ground.					
Other					
2.6.5.1	Safeguarding for a future southern runway should be removed if the NRP is approved.	<p>Safeguarding for a potential future southern runway significantly impedes the ability of Crawley to meet its development needs for housing, employment and noise sensitive supporting infrastructure such as schools. GAL is not actively pursuing this option and, given growth through the Project continues to 2047, it would be unlikely a southern runway would be needed until around 2050.</p> <p>Updated position (Deadline 1): The Crawley Borough Local Plan 2024-2040, now subject to Main Modifications Consultation retains the majority of safeguarding for a future southern runway, whilst allocating the Strategic employment site to the east of Balcombe Road. The comment here relates to the need for future safeguarding should the NRP be approved (ie. in the next Local Plan) given the significant constraint it imposes on housing and employment development in Crawley borough. This prevents economic development in the borough which could be a positive benefit from the NRP, hence it is considered relevant.</p>	<p>This matter is not considered relevant to this DCO Application, instead to be dealt with via the Local Plan process.</p> <p>As set out in GAL's representations to the CBC's Local Plan examination, GAL consider that the safeguarded land is required and justified as set out in the Gatwick Airport 2019 Masterplan. We are therefore not seeking to remove, review or amend the boundary or extent of the safeguarded land.</p> <p>GAL has made representations at every stage of CBC's Local Plan preparations objecting to its proposals to allocate employment land to the east of Balcombe Road in the safeguarded land. We continue to engage with CBC through the Local Plan examination.</p> <p>GAL continues to monitor Local Plan activity in host and neighbouring authorities and will make representations as and when required.</p>	n/a	Not Agreed

2.7. Draft DCO and Explanatory Memorandum

2.7.1 Table 2.7 sets out the position of both parties in relation to Draft DCO and Explanatory Memorandum matters.

Table 2.7 Statement of Common Ground – Draft DCO and Explanatory Memorandum Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.7.1.1	The Council has wide-ranging concerns about the DCO.	<p>These will be shared with the Applicant in due course and set out in the Council’s LIR. A summary of the Council’s main concerns (which is not exhaustive) is set out below – A summary of the Council’s main concerns (which is not exhaustive) is set out below –</p> <p>the definition of “commencement” and, 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).</p> <p>Updated position (Deadline 1): All references in this column to the draft Development Consent Order (“dDCO”) are to Version 3.0 of the dDO [PDLA-004] dated February 2024. This column provides a summary of the Council’s position in respect of the points detailed in Table 2.7. Further detail, particularly in respect of points not addressed in Table 2.7, will be submitted at Deadline 1.</p> <p>It is noted that each of the 15 exceptions to the definition of “commencement” is either included in at least one of the following made DCOs: Sizewell C, Manston Airport, and M25 Junction 28, or “aligns with emerging drafting submitted in the Luton Airport Expansion” dDCO.</p> <p>The SoCG and Explanatory Memorandum (“EM”) [AS-006] identify precedents; however, this is not enough. For instance, it does not follow that a provision relevant to the authorisation of a nuclear-powered generating station in Suffolk or the alteration of a motorway junction in Essex is relevant to the instant project. The relevance must be explained and the inclusion of the provision justified. The same point applies to provisions based on those which are included in airport DCOs, made or otherwise.</p> <p>Advice Note Fifteen: Drafting Development Consent Orders (republished July 2018 (version 2)) is clear on this point. It states –</p> <p>“If a draft DCO includes wording derived from other made DCOs, this should be explained in the Explanatory Memorandum. <u>The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO</u>, for example detailing what is factually similar for both the relevant consented NSIP and the Proposed Development. <u>It is not sufficient for an Explanatory Memorandum to simply state that a particular provision has found favour with the Secretary of State previously;</u></p>	<p>The drafting of the definition of “commence” has advanced since the version commented upon. There are now 15 exceptions at sub-paragraphs (a) to (o) of article 2(1).</p> <p>These exceptions are all preceded by at least one of the Sizewell C (article 2), Manston Airport (article 2) or M25 J28 (article 2) DCOs or align with emerging drafting submitted in the Luton Airport Expansion application (Schedule 2, Part 1). The only additional provision is sub-paragraph (n) (establishment of temporary haul roads), which has been included as a separate limb for clarity, though the stated activity falls within the scope of other more generally worded exceptions from “commencement” in precedent DCOs (e.g. ‘construction of temporary structures’).</p> <p>As per paragraph 3.4.1 of the Explanatory Memorandum to the Draft Development Consent Order (“ExM”), it is reasonable and proportionate to include the specified exceptions to enable the efficient use of time in the construction timetable prior to the triggering of “commencement” under the DCO. All pre-commencement activities will be subject to the Code of Construction Practice and its associated management plans (see Requirement 7) and must be carried out in accordance with the Carbon Action Plan (see Requirement 21).</p> <p>The activities specified in this definition were selected to accord with precedent and as activities which can be (and, in many cases, must be) carried out early in the construction timetable. As per the ExM, the activities do not give rise to materially new or materially different environmental effects to those assessed in the ES.</p> <p>The ES assesses the environmental impacts from preparatory and construction activities for the project, and the activities captured by the exceptions to the definition of “commence” have been assessed as part of this exercise. However, given that the exceptions are categories of activities which form part of the wider preparatory and construction works timetable, there are not specific passages of the ES which can be cited in respect of each individual exception. Certain of the pre-commencement activities which can be identified with particular certainty at this stage are</p>	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraph 3.4.1 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p> <p>ES Chapter 5 Project Description (Doc Ref. 5.1)</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p>	Under discussion

		<p><u>the ExA and Secretary of State will need to understand why it is appropriate for the scheme applied for. Any divergence in wording from the consented DCO drafting should also be explained.</u> Note, though, that policy can change and develop". (Paragraph 1.5, emphasis added).</p> <p>In the light of the above, it is clear the applicant should give reasons specific to each exception being suggested, rather than seeking to rely on the generic reference to precedent made in the EM and SoCG.</p> <p>The Council notes pre-commencement activities are subject to the COCP; however, this is not clear from Requirement 7 (code of construction practice) and it should be made explicit on the face of the dDCO. The limitations of the COCP, and the Council's concerns about that document, are described elsewhere in this document.</p> <p>Paragraph 3.4.1 of the EM [AS-006] states the excluded operations "do not give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement (Doc Ref. 5.1), being either de minimis or having minimal potential for adverse effects, in line with the Planning Inspectorate's Advice Note 15". Paragraph 3.4.1 then goes on to refer to them as "low impact preparatory works".</p> <p>Certain of the excluded operations would seem capable of giving rise to significant effects and it is not clear how the dDCO restricts these works to "low impact preparatory works". To give one example, sub-paragraph (k) ("erection of temporary buildings and structures") does not place any limit on the size of the "buildings and structures" or indicate what "temporary" might mean. An explanation is needed.</p> <p>Regarding temporary exempted works generally (for instance, as well as the temporary buildings and structures already referred to, sub-paragraph (n) provides for the "establishment of temporary haul roads" and sub-paragraph (o) for the "temporary display of site notices, advertisements or information") it is not clear how these will be dealt with when they are no longer needed. Again, this needs to be made clear on the face of the dDCO.</p> <p>The Council is surprised by the applicant's conclusion that no passage from the ES can be cited in respect of any exception (noting that, to give one example, the exception could provide for a temporary building of limitless size). The Council considers this approach to pre-commencement activities to be too casual and owing to this, and the lack of certainty as to what the exceptions to "commencement" would entail, considers these works should be subject to the approval of either the local</p>	<p>described from Paragraph 5.3.8 of ES Chapter 5: Project Description.</p>		
--	--	--	---	--	--

		planning authority or local highway authority, depending on the type of works involved.			
2.7.1.2	The Council has wide-ranging concerns about the DCO.	<p>Clarification of other definitions relating to various airport and boundary plans listed in the order and extent of operational land.</p> <p>Updated position (Deadline 1): The comments from GAL do not address the point made. The Council maintains its position that clarification is needed on how what is shown on the plans relates to the various definitions of the airfield boundaries, DCO limits and operational land for both the current and future Airport.</p>	<p>Many of the issues summarised in this row are addressed in Table 20 of the Issues Tracker, including at Rows 20.1, 20.3, 20.4, 20.7, 20.18, 20.26, 20.29 and 20.38. of Appendix 1.</p> <p>To the extent not addressed in that table or below in the responses to the detailed concerns of other stakeholders, GAL awaits the Council's detailed comments so that it can respond fully.</p>		Under discussion
2.7.1.3	The Council has wide-ranging concerns about the DCO.	<p>The drafting of article 3 (development consent etc. granted by Order).</p> <p>Updated position (Deadline 1): A drafting point regarding article 3(2): the EM says this paragraph is preceded in art.3(2) of the Manston Airport DCO 2022; however, while Gatwick refers to "Any enactment applying to land <u>within or adjacent</u> to the Order limits ..." Manston refers to "Any enactment applying to land <u>within, adjoining or sharing a common boundary</u> with the Order limits".</p> <p>The Council would be grateful if the applicant could confirm why it departed from the cited precedent.</p>	<p>Several precedent DCOs contain a separate article authorising the operation and use of the authorised development – see, for example, article 7 of the Sizewell C DCO: "<i>The undertaker is authorised to operate and use the authorised development for which development consent is granted by this Order.</i>"</p> <p>In drafting article 3 of the Draft DCO, it was considered that it was clearer and more succinct to subsume the separate authorisation of operation and use into a single provision in article 3.</p>	Draft Development Consent Order [AS-004]	Under discussion
2.7.1.4	The Council has wide-ranging concerns about the DCO.	<p>The drafting of article 6 (limit of works) which appears to allow GAL to exceed parameters beyond those assessed in the Environment Statement.</p> <p>Updated position (Deadline 1): The Council is considering this point further.</p>	<p>The drafting of article 6 has advanced since the version commented on by the Councils and is now complete.</p> <p>As above, no definition of "ancillary structures" is used in the latest draft DCO.</p>	Draft Development Consent Order [AS-004]	Under discussion
2.7.1.5	The Council has wide-ranging concerns about the DCO.	<p>The drafting of article 9 (planning permission) and provisions in relation to existing planning conditions and future planning controls (including permitted development rights).</p> <p>Updated position (Deadline 1): To allow the Council to understand the full implications of article 9(3) and (4), the Council requests the applicant provides a full list of the existing planning permissions (including deemed planning permission) which are at issue. Once that information is provided, the Council will be better able to say whether those provisions are acceptable.</p>	<p>Please refer to paragraphs 4.24 – 4.28 of the ExM, which explains the rationale for article 9 in light of the recent Supreme Court decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority</i> [2022] UKSC 30. Other recently submitted DCO applications make similar provision, including the draft Luton Airport Expansion DCO (article 45) and Lower Thames Crossing DCO (article 56).</p> <p>As regards the cited wording which disapplies incompatible conditions of previously granted planning permissions, similar wording features in article 45(2)(c) of the draft Luton Airport Expansion DCO.</p> <p>In response to the further queries:</p>	<p>Draft Development Consent Order [AS-004]</p> <p>Paragraphs 4.24 – 4.28 of the Explanatory Memorandum to the Draft Development Consent Order [AS-006]</p>	Under discussion

		<p>Regarding article 9(4), who will decide what “incompatible” means and how that will be conveyed to other parties (e.g. the local planning authority)?</p> <p>Regarding article 9(5), the Council disagrees with the applicant’s analysis that retaining permitted development rights would “allow for <u>minor works</u> to be separately consented without needing to rely on an amendment to the Order, which would be disproportionate and impractical”.</p> <p>First, the Council considers the potential scope of development permitted by the provisions cited in article 9(5) cannot be dismissed as “minor works” and is unconvinced these should be retained. Second, if further development, which is not authorised by the DCO, is to take place at the airport, it should be subject to control by the local planning authority. Third, if the applicant wants the DCO to authorise yet further works, these should be included in Schedule 1 in the usual way (and their effects assessed). This approach is consistent with <i>Advice note thirteen: Preparation of a draft order granting development consent and explanatory memorandum</i> (Republished February 2019 (version 3)) which states (at paragraph 2.9) the dDCO should include the following –</p> <ul style="list-style-type: none"> • “A full, precise and complete description of each element of the NSIP, preferably itemised in a Schedule to the DCO; and • A full, precise and complete description of each element of any necessary “associated development””. <p>The retention of permitted development rights could, contrary to <i>Advice note thirteen</i>, result in a partial and incomplete description of the proposed development being included in the dDCO.</p>	<ol style="list-style-type: none"> 1) The drafting at article 9(1) of the draft DCO is a model provision (article 36) which is well-established in numerous precedent DCOs. The drafting is by reference to section 264 of the Town and Country Planning Act 1990 (“TCPA 1990”) and the effect is to ensure that permitted development rights attaching to the undertaker in relation to operational land have effect as they would do if planning permission had been granted for the authorised development. “Operational land” is defined in section 263 TCPA 1990. 2) Sub-paragraphs (2) and (3) address legal risk arising from the <i>Hillside</i> decision and ensure that (i) the authorised development can continue to be carried out notwithstanding an incompatible planning permission and (ii) planning permissions granted and initiated prior to commencement of the authorised development under the DCO can continue to be lawfully implemented thereafter. Whether activities authorised by the DCO are taking place pre- or post-commencement do not affect these principles. 3) As above. 4) ‘Incompatibility’ is as discussed in the <i>Hillside</i> decision. A planning permission would be ‘incompatible’ with the development authorised by the DCO if it were physically impossible to build out both developments (e.g. due to overlapping consented structures). <p>There is no sub-paragraph (9) in article 9 of the current draft DCO and it is presumed that this point is in reference to sub-paragraphs (5) and (6) of the present drafting. These make clear that the DCO does not restrict the future exercise by the undertaker of permitted development rights. This is necessary to ensure that GAL as airport operator can continue to rely on its extant permitted development rights to facilitate the ongoing operation of the airport and allow for minor works to be separately consented without needing to rely on an amendment to the Order, which would be disproportionate and impractical.</p>		
2.7.1.6	The Council has wide-ranging concerns about the DCO.	<p>The drafting of article 25, which concerns trees and hedgerows.</p> <p>Updated position (Deadline 1): If “the removal of hedgerows, trees and shrubs” (i.e one of the exceptions from the definition of “commence” per article 2(1)(f)) is to be controlled by article 25, the Council considers this should be made explicit in the article itself.</p>	While “removal of hedgerows, trees and shrubs” is excluded from the definition of “commence” in article 2 as noted, the present article (now article 25) will still govern how these activities are carried out, article 25 providing the underlying authority for these activities.	Draft Development Consent Order [AS-004]	Under discussion

		<p>The applicant suggests that updated article 25 will refer to tree and hedge works needing to be carried out in accordance with BS 3998:2010 (or more recent industry best practice). However, the most recent dDCO [PDLA-004] does not include this (well-precedented) wording and the Council would be grateful if the applicant could explain its position.</p> <p>Paragraph 22.1 of <i>Advice Note Fifteen: Drafting Development Consent Orders</i> (Republished July 2018 (version 2)) states –</p> <p>“It is recommended that DCO Articles of this kind [i.e. which articles which provide for interference with hedgerows] are made relevant to the specific hedgerows intended for removal. To support the ExA, the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority”.</p> <p>Article 25 is inconsistent with this recommendation: it does not include a schedule or plan, yet it seeks to remove (under article 25(5)) any obligation to secure consent. No reasonable justification is given for this inconsistency. The Council considers the hedgerow-related provisions need to be recast to make them consistent with paragraph 22.1.</p>	<p>The wording relating to "important hedgerows" has been removed from the latest draft of article 25, following confirmation that no such hedgerows are anticipated to be affected by the proposed development.</p> <p>Defining "hedgerow" by reference to the Hedgerow Regulations 1997 is well-established in many DCO precedents, including the Sizewell C (article 81), Southampton to London Pipeline (article 42) and Manston Airport (article 34) DCOs. Including a bespoke definition would be a significant departure from precedent and is not considered to be justified.</p> <p>The drafting of article 25 has advanced since the version commented upon by the Councils. For example, article 25(1)(b) now includes "<i>or property within the authorised development</i>". GAL will carefully consider the other proposed additions and will include them in the next draft of the DCO where reasonable and justified. It is not anticipated that there will be any concerns with tree and hedge works needing to be carried out in accordance with BS 3998:2010 (or more recent industry best practice).</p> <p>By way of initial comment on the remaining suggested additions, the new proposed sub-paragraph (3) does not appear necessary because:</p> <ul style="list-style-type: none"> • it is unclear what is meant by "<i>relative bodies</i>"; • (3)(a) is not needed because authority is only conferred on the undertaker to fell or lop in the circumstances specified in sub-paragraphs (1)(a) and (b); • (3)(b) is not needed because the DCO will not obviate the need for consents required for protected species or laws related thereto; • (3)(c) is not needed because the draft DCO does not contain drafting obviating the need to obtain a felling licence and such a licence would therefore be required prior to felling; and <p>(3)(d) is not needed because the existence and protection afforded by tree preservation orders is not disturbed by the DCO (in the absence of express provision).</p>		
2.7.1.7	The Council has wide-ranging concerns about the DCO.	The drafting of Part 6 (Miscellaneous and General) particularly the impact of article 46 (disapplication of legislative provisions) on drainage and article 48, which provides a defence to statutory nuisance.	Noted. The need for any protective provisions will be discussed with the LLFA and updates provided where necessary.	Draft Development Consent Order [AS-004]	Under discussion

		<p>Updated position (Deadline 1): Regarding article 46 (disapplication of legislative provisions), the Council notes the need for any protective provisions will be discussed with the LLFA but also CBC Drainage Officer and updates provided where necessary. Having discussed this provision with other GOG authorities, the Council considers the drainage protective provisions secured on behalf of Surrey County Council in Part 4 of Schedule 9 to the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 (SI 2002/549) would be an appropriate starting point. The Council would welcome the applicant's comments on this suggestion.</p> <p>Regarding article 48 (defence to statutory nuisance), article 48(1) is too wide-ranging in its application to nuisances falling within section 79(1) of the Environmental Protection Act 1990. The Council considers it should apply, like Model Provision 7, to section 79(1)(g) only.</p> <p>Article 48(2) says that compliance with the controls and measures described in the code of construction practice ("COCP") will be sufficient, but not necessary, to show that an alleged nuisance could not reasonably be avoided for the purposes of paragraph (1). The Council considers this provision represents an unwelcome and unnecessary fettering of the discretion of the courts in dealing with statutory nuisance cases. So far as the Council knows, it is not widely precedented and the Council is unaware of any local need for it. The applicant should be put to strict proof as to why it is needed, giving examples of other made DCOs where it would have been necessary (not just convenient) to have had it. Absent such proof, the provision should be deleted.</p> <p>Notwithstanding the preceding paragraph, the COCP describes its purpose as being "the environmental management system and measures that will be in place through <u>the construction</u> of the Project" (paragraph 1.2.1, our emphasis) [APP-082]. However, article 48(1) also applies to the <u>maintenance</u> and <u>operation</u> of the authorised development, which would not seem to be covered by the COCP. It seems therefore that references to "maintenance and operation" in article 48(1)(a) and (b) should be deleted.</p>			
2.7.1.8	The Council has wide-ranging concerns about the DCO.	<p>The inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development).</p> <p>Updated position (Deadline 1): It is not clear to the Council how these hotel-related Works are "associated development", per section 115 of the Planning Act 2008. There does not appear to be an explanation in the EM. A satisfactory explanation is needed. Moreover, the Council is concerned about the prospect of these works evading proper environmental controls, including in relation to parking and its impact on surface access. Owing to</p>	<p>Many of the issues summarised in this row are addressed in Table 20 of the Issues Tracker, including at Rows 20.1, 20.3, 20.4, 20.7, 20.18, 20.26, 20.29 and 20.38 of Appendix 1.</p> <p>To the extent not addressed in that table or below in the responses to the detailed concerns of other stakeholders, GAL awaits the Council's detailed comments so that it can respond fully.</p>	n/a	Under discussion

		these facts, the Council considers these Works should be deleted from the dDCO.			
2.7.1.9	The Council has wide-ranging concerns about the DCO.	<p>The drafting of several requirements (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 in R.19 (airport operations);</p> <p>Updated position (Deadline 1): Requirements: general The Council notes the response in Row 20.29 in Table 20 of the Issues Tracker; however, it does not consider it answers its question. Put another way, the Council would like to understand why "in general accordance" has been used in Requirements 8(3), 10(2), 11(2), 21 and 22(2); and why "substantially in accordance" has been used in Requirements 7, 8(4), 12(2), 13(2) and 22(3).</p> <p><u>Requirement 3: start date</u> By Requirement 3(1), development must commence within 5 years of the "start date" i.e. the later of the day after (a) the day on which the period for legal challenge of the Order under the 2008 Act has expired; and (b) the final determination of any legal challenge under the 2008 Act. The Council objects to the extended duration of "start date", which should be when the order comes into force.</p> <p><u>Requirement 3: notice period etc.</u> By Requirement 3(2), the relevant planning authority must be given 14 days' notice of commencement of each part of the authorised development. The Council considers a more generous notice period should be included. The Council also considers the local highway authority, which is also a discharging authority for certain requirements, should be notified of commencement.</p> <p>The Council's has several concerns about each of the noise-based requirements. In summary, these include the following points –</p> <p><u>Requirements 15 (air noise envelope)</u> There is no role for any local authority control in this Requirement and the Council considers there should be. (The same point applies to R.16 (air noise envelope) and R17 (verification of air noise monitoring equipment)).</p>	<p>Many of the issues summarised in this row are addressed in Table 20 of the Issues Tracker, including at Rows 20.1, 20.3, 20.4, 20.7, 20.18, 20.26, 20.29 and 20.38 of Appendix 1.</p> <p>To the extent not addressed in that table or below in the responses to the detailed concerns of other stakeholders, GAL awaits the Council's detailed comments so that it can respond fully.</p>	n/a	Under discussion

		<p>While the EM summarises the Requirement, it does not provide the necessary justification as required by paragraph 1.5 of Advice Note Fifteen. For instance, it does not provide the source of this provision (if any), the section of the Planning Act 2008 under which it is made, or why it is appropriate for the development of the project. Similarly, it does not explain why the CAA is the appropriate body for discharging Requirements 15 to 17. The Council considers the EM should be amended to reflect these points. The Councils can then better consider their position in respect of these requirements.</p> <p>The Council notes R.15(4) requires the applicant to publish certain information on a website within 45 days of it being approved by the independent air noise reviewer. The Council seeks confirmation as to why such a long deadline is included. Once approved, a document can be published on a website within seconds. (The same point applies to Rs. 16(6) and 17.</p> <p><u>Requirement 18 (noise insulation scheme)</u> Again, little justification is provided for this requirement, which appears to be unprecedented.</p> <p>In the first instance, it would be helpful to know why each of the time limits set out in the requirement has been chosen. For instance, in R.18(1), why does the applicant have up to 3 months from commencement of Work Nos. 1 to 7 to submit noise insulation scheme details to the relevant planning authority? Why can't that be done (say) before commencement? The same point applies to the 6-month limit in R.18(2). The Council would expect these points to be explained or sign-posted in the EM.</p> <p>Again in R.18(2), the Council considers the requirement to use "appropriate steps" to notify residential properties to be imprecise and considers these "steps" should be described in the requirement. As well as being imprecise, absent the explanation, the requirement would be difficult to enforce. In its current form, the requirement does not appear to satisfy at least two of the six tests of conditions (i.e. enforceable and precise) as required by the <i>Circular 11/95: Use of conditions in planning permission</i>.</p> <p><u>Requirements 19 (airport operations)</u> R.19(1) requires the applicant to serve notice on the relevant planning authority no later than 7 days after the commencement of dual runway operations informing of the same. The EM explains the timeframe is relevant "to other control mechanisms", though it does not explain what these are and it is not clear from the DCO what these are. The Council would welcome an explanation.</p>			
--	--	---	--	--	--

		<p>R.19(2) would restrict dual runway operations to 386,000 <u>commercial</u> air transport movements per annum. The Council considers a control on <u>total</u> air transport movements per annum would be appropriate and considers a total of no more than 389,000 would be reasonable.</p> <p>R.19(3) allows the use of the northern runway between the hours of 23:00 - 06:00 when the southern runway is not available for use “for any reason”. The Council considers “for any reason” to be too broad and considers the use of the northern runway between these times should only be used when the southern runway is not available because of planned maintenance and engineering works.</p>			
2.7.1.10	The Council has wide-ranging concerns about the DCO.	<p>Concerns regarding Schedule 11, including the proposed timeframe for granting approval for the works, particularly those which are complex and for which limited information has been provided. The lack of any fee proposal for the processing approvals etc. is a matter of genuine concern.</p> <p>Updated position (Deadline 1): The Council notes paragraph 3 (fees) is to be populated and looks forward to discussing the most appropriate way forward regarding fees. On a drafting point, the Council considers the provision should go beyond the payment of a fee in respect of “any for agreement, endorsement or approval <u>in respect of a requirement</u>” and should also apply to the payment of a fee in respect of the granting of any consent in respect of the Order. It will be remembered that several articles require the consent of the street authority (e.g. articles 12(3) and 14(4)), the traffic authority (e.g. article 18(5)(c)) and the highway authority (article 24(4)) and the cost associated with administering this work should also be covered by the applicant.</p> <p>CBC welcomes the extended timeframes, but further discussion is required regarding the mechanisms for approval of requirements before appropriate timeframes can be agreed</p>	<p>Many of the issues summarised in this row are addressed in Table 20 of the Issues Tracker, including at Rows 20.1, 20.3, 20.4, 20.7, 20.18, 20.26, 20.29 and 20.38 of Appendix 1.</p> <p>To the extent not addressed in that table or below in the responses to the detailed concerns of other stakeholders, GAL awaits the Council's detailed comments so that it can respond fully.</p>	n/a	Under discussion
2.7.1.11	The Council has wide-ranging concerns about the DCO.	<p>The limited information contained in the documents listed in Schedule 12 (documents to be certified).</p> <p>Updated position (Deadline 1): The Council’s concerns with the documents listed in Schedule 12 are set out elsewhere.</p>	These provisions have advanced since the version commented on by the Councils and are now as intended.	Draft Development Consent Order (Doc Ref. 2.1)	Under discussion
2.7.1.12	Resources, timings and costs involved with discharge of requirements and monitoring and enforcement of ongoing mitigation measures	<p>There has been no discussion with applicant to date on this matter. Schedule 11 in the DCO is not populated.</p> <p>Updated position (Deadline 1): The Council notes paragraph 3 (fees) is to be populated and looks forward to discussing the most appropriate way forward regarding fees. On a drafting point, the Council considers the provision should go beyond the payment of a fee in respect of “any for</p>	Schedule 11 (procedures for approvals, consents and appeals) is now complete, other than the placeholder in paragraph 3 (fees). GAL is happy to continue discussions on the most appropriate way forward as regards the Council's fees arising from the proposed development.	Draft Development Consent Order (Doc Ref. 2.1)	Under discussion

		<p>agreement, endorsement or approval <u>in respect of a requirement</u>" and should also apply to the payment of a fee in respect of the granting of any consent in respect of the Order. It will be remembered that several articles require the consent of the street authority (e.g. articles 12(3) and 14(4)), the traffic authority (e.g. article 18(5)(c)) and the highway authority (article 24(4)) and the cost associated with administering this work should also be covered by the applicant.</p> <p>CBC is also concerned about the cost and resource implications of ongoing monitoring and enforcement of mitigation measures, which will need to be addressed through the Requirements and/or S.106 Agreement.</p>			
--	--	--	--	--	--

2.8. Ecology and Nature Conservation

2.8.1 Table 2.8 sets out the position of both parties in relation to ecology and nature conservation matters.

Table 2.8 Statement of Common Ground – Ecology and Nature Conservation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
2.8.1.1	Baseline information	Baseline Information - the Phase 1 Habitat Survey should have extended beyond the project site boundary to identify wildlife corridors and potential enhancement opportunities in the surrounding landscape. Updated position (Deadline 1): CBC maintains this position.	The scope of the surveys undertaken to inform the Project was agreed with Natural England during pre-submission consultation. This included with respect to the Phase 1 Habitat Survey.	n/a	Not Agreed
2.8.1.2	Tree survey data	Detailed tree survey data has only been provided for the surface access (highway) sections only. An arboricultural assessment in accordance with BS5837:2012 providing a baseline for arboricultural features, including all trees that could be impacted by the Project (including those adjacent to the DCO limits) should be provided. Updated position (Deadline 1): Submission of full detailed arboricultural surveys and assessment welcomed.	An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available. Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.	ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3) ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)	Under discussion
Assessment Methodology					
2.8.2.1	Evidence for null findings of ancient or veteran trees, as well as important hedgerows.	No demonstration that these receptors have been appropriately surveyed, nor followed appropriate methodology. Ancient and veteran trees were surveyed using recognised guidance with none being identified; however, the methodology for determining such status has not been made clear, nor has the survey data been evidenced by the Applicant in support of this finding. Updated position (Deadline 1): Unable to find section A2.1.159 of Appendix 9.6.2. Tree data within the oLEMP appears to only include the surface access works. Methodology within sections A1.1.161-182 has been reviewed to support stakeholder position, the documents referred provide guidance only, no methodology is provided.	An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available. The methodology used to assess the presence of Veteran Trees is set out in Section A2.1.159 of Appendix 9.6.2 Ecology Survey Report of the ES. Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.	ES Appendix 9.6.2 Ecology Survey Report Part 2 [APP-124] ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3) ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)	Not Agreed
Assessment					

<p>2.8.3.1</p>	<p>Lack of approaching assessing and addressing ecological impacts at a landscape scale</p>	<p>Ecological impacts will extend beyond the DCO limits 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 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. The scope and detail of the mitigation, compensation and enhancement of key sites and the need for providing off site compensatory habitat and biodiversity net gain.</p> <p>Updated position (Deadline 1): CBC maintains this position.</p>	<p>As set out in paragraph 9.4.9 <i>et seq.</i> of Chapter 9 Ecology and Nature Conservation of the ES, the potential for ecological impacts beyond the DCO limits was recognised through the extension of the survey work beyond the limits, where necessary (bats, GCN, riparian mammals etc.).</p> <p>As such, the impact assessment has considered impacts outwith the DCO limits, where there is the potential for such impacts to occur.</p> <p>The impacts of the Project on habitat connectivity have been considered within Section 9 of Chapter 9 Ecology and Nature Conservation of the ES. This concluded that, although there would be nowhere that connectivity would be completely removed, there were areas where it would be reduced due to the loss of woodland. This was assessed as being of moderate adverse significance until the replacement planting matured sufficiently when this was reduced below the threshold of significance.</p> <p>The long-term maintenance of habitat connectivity both across the airport and between the airport and the wider landscape as a result of the Project has been a key driver of the overall Ecology Strategy, as set out in the oLEMP.</p>	<p>Section 9 of ES Chapter 9 Ecology and Nature Conservation [APP-034]</p>	<p>Not Agreed</p>
<p>2.8.3.2</p>	<p>Lack of demonstration that arboricultural features have been considered, designed for and appropriately avoided, mitigated or compensated for</p>	<p>Potential impacts multiple to arboricultural features of unknown value. Arboricultural features are a material planning consideration. It is therefore, disappointing that a relevant depiction of such features has not been presented using recognised survey and assessment techniques. Accordingly, the impact on such receptors is incomplete. Further, adequate protection measures for ancient woodland and other retained arboricultural features have not been demonstrated.</p> <p>It is not clear how tree protection measures stated within Table 9.8.1 of Chapter 9 Ecology and Nature Conservation of the ES are appropriate nor adequate. This must be informed from an Arboricultural Impact Assessment (in accordance with BS5837:2012).</p> <p>Updated position (Deadline 1): Initiation of discussion is welcomed. Any mitigation or compensation measures will need to be secured by DCO requirements. An Arboricultural Method Statement must also be submitted alongside other documents stated by the Applicant.</p>	<p>An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and a Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>ES Appendix 9.6.2 Ecology Survey Report Part 2 [APP-124]</p> <p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	<p>Under discussion</p>
<p>2.8.3.3</p>	<p>Inadequate consideration and demonstration for the protection of ancient</p>	<p>Potential impact to ancient woodlands receptors where barriers are specified to form buffer zone protection. This is of principle concern for</p>	<p>An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available. This will include details of the protection of ancient</p>	<p>Submission of full detailed arboricultural surveys and</p>	<p>Under discussion</p>

	woodland. Conflicting with the finding of 'no impact' occurring to these receptors.	Horleyland Wood due to the adjacent proposed works area for the new foul water pipeline.	woodland, following the principles set out in Table 9.8.1 of Chapter 9 Ecology and Nature Conservation of the ES. Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.	assessments are welcomed, this must include a supporting Arboricultural Method Statement. ES Chapter 9 Ecology and Nature Conservation [APP-034]	
2.8.3.5	Important hedgerows	The surveyance for 'important hedgerows' followed recognised methodology and though none were identified, no survey data has been evidenced in support of this finding. WSCC wishes to see that evidence. Updated position (Deadline 1): Submission of findings welcomed.	Raw data from the Hedgerow Survey will be shared with CBC.	n/a	Under discussion
Mitigation and Compensation					
2.8.4.1	The extent of loss of mature broadleaved woodland (net loss over 5 ha)	Although some woodland will be re-planted along the new highway alignment it will be years before bat foraging and roosting habitat, and habitat connectivity are fully reinstated. The assessment concludes there is a significant effect on bat behaviour until new woodland planting had established. Current mitigation and compensation measures are insufficient to maintain bat foraging habitat and commuting routes over the short and medium term. Updated position (Deadline 1): Greater clarity is required on habitat loss, compensatory habitat and habitat gain, including the precise locations and extent of habitat involved. The information in Appendix 9.9.2 (BNG Statement), including the figures for woodland, is unclear & difficult to match with the Sketch Landscape Concept Plans within the OLEMP. Further discussion would be welcome.	The planting proposed, once mature, will ensure that there are no residual significant effects on either woodland nor bat foraging/commuting habitat. The maintenance of foraging and commuting routes for bats was a key element in the design principles for the Project, in particular along the River Mole and Gatwick Stream. For example, as set out in Table 9.8.1 of Chapter 9 Ecology and Nature Conservation, this has included limiting vegetation loss along the A23 to ensure sufficient vegetation is retained to maintain a dark corridor along the bat foraging and commuting route present along the Gatwick Stream. Therefore, although the loss of woodland along the A23 in particular will result in a reduction in the area of bat foraging/commuting habitat (as set out in the ES), there will be no complete severance of commuting routes. A lighting strategy would be included in the CoCP to ensure that construction lighting was directed to where it was needed and did not significantly increase levels of artificial lighting on sensitive habitats, such as retained woodland and river corridors. Lighting will be designed in accordance with Institute of Lighting Professionals /Bat Conservation Trust guidelines. Construction task lighting will be directed to where it is needed only, to avoid light spillage. Accessories such as hoods, cowls and shields will be used to direct light to the intended area only. Light levels will be as low as the guidelines permit. If construction lighting is not needed, it will be avoided.	Table 9.8.1 of ES Chapter 9 Ecology and Nature Conservation [APP-034] ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)	Under discussion

2.8.4.2	Need for security of long-term positive management of the two biodiversity areas - the North West Zone and Land East of the Railway Line.	<p>These areas 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.</p> <p>Updated position (Deadline 1): It is noted that the NWZ is included in Zone 3 (oLEMP Section 3.4.1) but details for LERL appear to be lacking. Is it within Zone 8? Further discussion would be welcome.</p>	<p>It is intended to include the management of the NWZ within the LEMP for the River Mole works and the LERL within the LEMP for the works in that area.</p> <p>Requirement 8 of the dDCO sets out that appropriate LEMPs for these areas are to be produced, based on the oLEMP. This places a legal obligation on GAL to undertake the management proposed which will, in turn, protect these areas.</p>	<p>Requirement 8 of the Draft DCO (Doc Ref. 2.1)</p> <p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-113-116]</p>	Under discussion
2.8.4.3	The OLEMP and CoCP do not demonstrate appropriate outline methodology for tree protection and ancient woodland buffer zones.	<p>Potential impacts multiple to arboricultural features due to a lack of tree protection.</p> <p>Updated position (Deadline 1): It is not clear how tree protection measures stated within Table 9.8.1 of Chapter 9 Ecology and Nature Conservation of the ES are appropriate nor adequate. This must be informed from an Arboricultural Impact Assessment (in accordance with BS5837:2012).</p> <p>The current CoCP does not secure the mitigation measures or plans stated. It is not understood how these measures are secured by the DCO.</p>	<p>An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	Not Agreed
2.8.4.4	The OLEMP does not provide clarity that detailed arboricultural method statements and planting plans and aftercare management will be provided within proposed LEMPs.	<p>Potential impacts multiple to arboricultural features due to a lack of tree protection, and unclear proposed compensatory soft landscaping.</p> <p>Updated position (Deadline 1): Response requires further clarity and has not addressed the issue raised.</p>	<p>The oLEMP is to be updated to set out that those points raised by CBC will be produced in detail.</p> <p>An Arboriculture Impact Assessment and Tree Protection Plan are being produced and will be shared with the local authorities once available.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	Not Agreed
2.8.4.5	Compensation strategies for tree, woodland and hedgerow loss not demonstrating adequate compensation, and that proposed compensation being recognised as a significant long-term impact.	<p>The net loss of woodland, the fragmentation of habitat connectivity, and the long-term effect from the time required to establish new planting.</p> <p>Updated position (Deadline 1): Most new planting is situated outside of the airport and it is not understood how the 'safeguarding requirements' would apply in these areas and shouldn't be limited to 'where practicable' only. Concern is raised over the longevity of time required to allow planting to mature, and the significant but temporary effect between which has not been compensated for</p>	<p>The removal of vegetation in both locations has been minimised, where possible, during design to date. The final design of the highways works will seek to minimise the loss further, as far as practicable.</p> <p>The loss of woodland is compensated for, as far as is practicable, within the confines of the safeguarding requirements of an operational airport, to ensure that the overall loss is considered to be of minor adverse significance, once planting has matured.</p>	<p>ES Chapter 9: Ecology and Nature Conservation [APP-034]</p>	Not Agreed

2.8.4.7	Design Principles	<p>Although a worst-case approach has been taken to assessing the impacts upon habitats, the Council would expect to see a reduction of this worst-case impact to these sensitive habitats applied as a key design principle during the detailed design stage. The Council would have expected the design principles presented as part of the DAS to be clearer, more joined up and more detailed. Further consultation on these design principles should be undertaken.</p> <p>Updated position (Deadline 1): CBC would welcome revised Design Principles in the DAS. Further discussion would be welcome</p>	<p>A worst-case approach has been adopted to ensure that all potential impacts are identified and mitigation is applied appropriately.</p> <p>GAL will seek to further reduce impacts to sensitive habitats, where practicable, and this will be included in the next iteration of the Design Principles for consideration at detailed design stage.</p>		Under discussion
2.8.4.8	OLEMP	<p>The dDCO contains a requirement for the creation and approval of LEMPs in accordance with the OLEMP. However, a description of the content expected is not provided within the OLEMP. Further details on the usual documents required to deliver essential mitigation, compensation and enhancement should be provided.</p> <p>Updated position (Deadline 1): Whilst response is understood, the applicant needs to clarify within the oLEMP as to what plans/documents will be delivered within the each LEMP to ensure those principles provided. Further discussion would be welcomed.</p>	<p>Each LEMP will provide details of the establishment and management of habitats to be created within each works area, including the necessary landscape design. These details will be based on the principles set out within the oLEMP and, as such, each LEMP will broadly follow the structure set out in the oLEMP. The detailed LEMPS will provide details of the area, the objectives for habitat creation and management within that area (from both an ecological and landscape perspective), how the habitats will be created and management prescriptions to ensure that the objectives set out can be delivered.</p>	<p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-113-116]</p>	Under discussion
2.8.4.9	Advanced planting	<p>The reported effect on trees and woodland (of varied types) remains a long-term, significant impact. Planting proposals have not utilised enough opportunities for advanced planting to minimise establishment time, notably alongside the highway corridor.</p> <p>Updated position (Deadline 1): Advanced planting (or enhancement of existing features) has not been considered adjacent the highway corridor.</p>	<p>Advanced planting along the highway corridor is not possible as all the vegetation not impacted will be retained and with vegetation within the construction boundary will be removed. These areas will be replanted in the next planting season, post completion of the surface access works.</p>	n/a	Not Agreed
Other					
2.8.5.2	Ecological Clerk of Works	<p>There is a lack of clarity on the roles and responsibilities of the Ecological Clerk of Works. These need to be clearly specified within the relevant documents and agreed with local authorities.</p> <p>Updated position (Deadline 1): An updated CoCP clearly defining the roles and responsibilities of the ECoW would be most welcome.</p>	<p>The role of the Ecology Clerk of Works will be to provide on-site ecological expertise during construction, including overseeing habitat clearance to ensure compliance with wildlife legislation. GAL will update the CoCP to include additional detail on the responsibilities.</p>	n/a	Under discussion

2.9. Forecasting and Need

2.9.1 Table 2.9 sets out the position of both parties in relation to forecasting and need matters.

Table 2.9 Statement of Common Ground – Forecasting and Need Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>Please see the joint Statement of Common Ground prepared in relation to Forecasting and Need (Doc Ref. 10.1.18).</i>					

2.10. Geology and Ground Conditions

2.10.1 **Table 2.10** sets out the position of both parties in relation to geology and ground conditions matters.

Table 2.10 Statement of Common Ground – Geology and Ground Conditions Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Geology and Ground Conditions in this Statement of Common Ground.</i>					

2.11. Greenhouse Gases

2.11.1 Table 2.11 sets out the position of both parties in relation to greenhouse gases matters.

Table 2.11 Statement of Common Ground – Greenhouse Gases Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic.					
Assessment Methodology					
2.11.2.1	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. It is not clear what is captured under “other associated businesses”.</p> <p>Updated position (Deadline 1): Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.</p> <p>Additionally, GAL should recognise the potential impact of emissions stemming from airport operations at least qualitatively for the sake of transparency. This acknowledgment aligns with one of the key principles of GHG accounting.</p>	<p>The methodology for the assessment was structured to follow the ANPS classification of emissions into four categories, and the assessment of Construction impacts was limited within the ES to those impacts prior to opening. The assessment was not seeking to provide a Whole Life Carbon assessment of the Project - a point explicitly noted within the ES.</p> <p>Maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the ES Appendix 5.4.2 Carbon Action Plan, specifically regarding to employing PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>Regarding terminology of “associated businesses” in Table 16.4.1 of ES Chapter 16 Greenhouse Gases seeks to include other operations within the boundary of the Application that generate waste during typical operations of the airport.</p>	<p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p> <p>Table 16.4.1 of ES Chapter 16 Greenhouse Gases [APP-041]</p>	Not Agreed
2.11.2.2	The ES [TR020005] 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.	<p>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.</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</p>	<p>The intention is not to obscure any modelling results. The methodology adopted has sought to identify likely, reliable, and considered sources for decarbonisation trends across each aspect of the assessment for the period out to 2050. The IEMA Guidance on Assessing GHG Emissions and Evaluating their Significance specifically notes (P19) that it is appropriate to adopt multiple GHG emissions factors for activities where these are</p>	<p>ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194]</p>	Agreed

	Therefore, the conclusion of ES is not in alignment with the IEMA 2022) GHG Assessment Guidance.	<p>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>Updated position (Deadline 1): We acknowledge the Applicant's assessment has been undertaken with consideration to the Jet Zero high ambition trajectory and that this trajectory is representative of government's current 'budget' for aviation to contribute to net zero. On this basis it could be considered to align with the approach set out by IEMA.</p>	<p>expected to change over time and refers to several UK Government documents as appropriate sources of information to derive these.</p> <p>The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions.</p>		
2.11.2.3	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.	<p>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 "implement a policy to manage aviation demand as soon as possible".</p> <p>The GHG Assessment does not acknowledge any of these concerns and risks of the Jet Zero strategy, which the GHG Assessment hinges on.</p>	<p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>	n/a	Agreed
2.11.2.4	Summary	<p>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.</p> <p>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.</p>	<p>See above Row 14.1 of this table in relation to the report of the CCC.</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>	n/a	Agreed
2.11.2.5	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.	<p>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.</p> <p>Updated position (Deadline 1): Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.</p>	<p>The assessment does not seek either to develop a Corporate Reporting Account (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project - the methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment. It is not debated that Well-to-tank emissions arise in the supply chain for fuels and methodologies for estimating these (as an uplift to direct emissions) are well established.</p> <p>However, the approach adopted is based on the assessment process which is contextualising emissions against a) the UK</p>	n/a	Not Agreed

		<p>Additionally, GAL should recognise the potential impact of emissions stemming from airport operations at least qualitatively for the sake of transparency. This acknowledgment aligns with one of the key principles of GHG accounting.</p>	<p>carbon budget and b) the Jet Zero Strategy. The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years¹) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero commitment. Additionally the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it has also been removed from other aspects of the GHG assessment.</p> <p>Ref 1: https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes</p>		
2.11.2.6	<p>In Table 2.1.1 it is confirmed that the carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].</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 Methodology [TR020005] referenced under Section 16.4.24.</p> <p>Updated position (Deadline 1): It is acknowledged that excluding specific emission sources from the assessment is valid for the purpose of conducting a like-for-like comparison against a carbon budget/trajectory. However, given that transparency is a fundamental principle of GHG accounting, GAL should openly report these potential emission sources at least qualitatively</p>	<p>The assessment does not seek either to develop a Corporate Reporting Account (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project – the methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment. It is not debated that Well-to-tank emissions arise in the supply chain for fuels and methodologies for estimating these (as an uplift to direct emissions) are well established.</p> <p>However, the approach adopted is based on the assessment process which is contextualising emissions against a) the UK carbon budget and b) the Jet Zero Strategy. The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years¹) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero commitment. Additionally the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it has also been removed from other aspects of the GHG assessment.</p> <p>Ref 1: https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes</p>	n/a	Not Agreed
2.11.2.7	<p>In Section 1.2.1, it is not clear if carbon calculations are carried out for maintenance, repair, replacement or</p>	<p>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.</p>	<p>The methodology for the assessment was structured to follow the ANPS classification of emissions into four categories, and the assessment of Construction impacts was limited within the ES to those impacts prior to opening. The assessment was not seeking</p>	<p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p>	Not Agreed

	refurbishment emissions.	<p>Updated position (Deadline 1): Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.</p> <p>Additionally, GAL should recognise the potential impact of emissions stemming from airport operations at least qualitatively for the sake of transparency. This acknowledgment aligns with one of the key principles of GHG accounting.</p>	<p>to provide a Whole Life Carbon assessment of the Project - a point explicitly noted within the ES.</p> <p>Maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the ES Appendix 5.4.2 Carbon Action Plan, specifically regarding to employing PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>Regarding terminology of “associated businesses” in Table 16.4.1 of ES Chapter 16 Greenhouse Gases seeks to include other operations within the boundary of the Application that generate waste during typical operations of the airport.</p>	<p>Table 16.4.1 of ES Chapter 16 Greenhouse Gases [APP-041]</p>	
2.11.2.8	It is not clear how or if Applicant converted CO2 emissions from aircraft to CO2e.	It is not clear if the Applicant undertook a conversion from CO2 to CO2e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023). Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO2e in 2028 in the most carbon-intensive year where 5.327 MtCO2e was estimated to be released (Table 5.2.1)	The modelling process estimated fuel consumption from aviation, and this was then converted to estimated tCO2e using the appropriate conversion factor. All aviation emissions within the ES are reported to reflect tonnes of carbon dioxide equivalent (tCO2e).	n/a	Agreed
2.11.2.9	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].	<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 where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24.</p> <p>This would result in an underestimation of the GHG emissions associated with aviation since a 20.77% (BEIS, 2023) uplift would be required on all aviation emissions.</p> <p>Therefore, this would result in 1,106,530tCO2e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO2e was estimated to be released (Table 5.2.1).</p> <p>Updated position (Deadline 1): It is acknowledged that excluding specific emission sources from the assessment is valid for the purpose of conducting a like-for-like comparison against a carbon budget/trajectory.</p>	<p>See above Row 14.1 of this table in relation to the report of the CCC.</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>	n/a	Not Agreed

		However, given that transparency is a fundamental principle of GHG accounting, GAL should openly report these potential emission sources at least qualitatively.			
Assessment					
2.11.3.1	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.	The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels. 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. 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, which may have significant consequences on the UK's net zero trajectory.	It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant. This is noted in ES Paragraph 16.10.4 that references the IEMA Guidance noting that "The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that 'effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other'."	Para 16.1.4 of ES Chapter 16 Greenhouse Gases [APP-041]	Agreed
2.11.3.2	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.	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.	RICS Whole Life Carbon Assessment for the Built Environment Vol 1 was used to develop an estimated transport distance for bulk materials and used the parameters for locally manufactured materials (50km by road) and nationally manufactured materials (300km) in an estimated 80:20 ratio - resulting in an average value of 100km for each unit of material transported. At this stage the likely sourcing of materials is not known but the majority of materials (by weight) are likely to be sourced within the UK due to the large costs associated with transporting these large distances - particularly as this part of the assessment process relates to construction of airfield works where the majority of materials are imported fill, asphalt, concrete, and GSB. Assessment of the buildings emissions impact, and the Highways elements, are calculated using an alternative method that does not make use of this average 100km transport distance figure. On this basis the 100km is considered a reasonable assumption within the assessment methodology.	Table 4.1.1 of ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions [APP-191]	Agreed
Mitigation and Compensation					
There are no issues relating to mitigation and compensation for this topic.					
Other					
2.11.5.1	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.	It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following: "We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major		Agreed

			<p><i>review will be in 2027, five years after publication of the Strategy in 2022.</i></p> <p><i>The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</i></p> <p><i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."</i></p> <p>The NRP application accords with government policy. As set out in the Government's Response, aviation expansion (explicitly including the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.</p>		
--	--	--	---	--	--

2.12. Health and Wellbeing

2.12.1 Table 2.12 sets out the position of both parties in relation to health and wellbeing matters.

Table 2.12 Statement of Common Ground – Health and Wellbeing Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
Assessment Methodology					
2.12.2.1	Lack of evidence of engagement and results from that engagement with the communities/ receptors.	<p>Results should be presented with a detailed description of the statistical methods used, including all variables accounted for and those not included in the analysis models. This would enable a better interpretation of the results, which seem not to be in line with what should be expected. A detailed definition of the populations in the study area and a clear description of evidence supporting each assumption made have not been demonstrated.</p> <p>Updated position (Deadline 1): The Applicant has demonstrated in the documentation that they have reached out to a range of community groups and organisations. Though no mention of vulnerable groups in the context of those with physical or psychological vulnerabilities. Documentation was offered in alternative formats and languages but only if requested no evidence of proactive engagement with non-English speaking audience in their language.</p> <p>Relevant documents searched for words, Vulnerable, Hard to reach, disabilities, disabled, hearing, ethnic, nationalities with no result.</p>	<p>ES Chapter 18: Health and Wellbeing has taken into account the consultation responses of health stakeholders and the public. The health stakeholder engagement is discussed in ES Appendix 18.3.1 and the consultation responses from the public taken into account are provided in the separate Consultation Report.</p> <p>There have been a comprehensive series of consultation events, including with hard-to-reach groups. Consultation through the DCO process is conducted through a series of statutory defined processes. This includes Section 42 Planning Act 2008 consultation with stakeholders and Section 47 Planning Act 2008 consultation with the public. The Consultation Report discusses the Section 47 engagement with the community for the Autumn 2021 consultation in section 5.6 and for the Summer 2022 consultation in section 6.6. Consultation Report Annex A-D set out the issues raised and the response for each consultation. The responses from these consultations were taken into account within Chapter 18: Health and Wellbeing.</p> <ul style="list-style-type: none"> Autumn 2021 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A, Table A.2 section 'I. Health and well-being'. Summer 2022 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A, Table C.2 section 'I. Health and well-being'. 	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Appendix 18.3.1: Summary of Stakeholder Responses [APP-203]</p> <p>Consultation Report Annex A [APP-219]</p> <p>Consultation Report Annex B [APP-220]</p> <p>Consultation Report Annex C [APP-221]</p> <p>Consultation Report Annex D [APP-222]</p>	Under discussion
2.12.2.2	Feedback from vulnerable groups	Data relating to the study area, specifically the feedback from the individual vulnerable groups would be welcomed, to ensure that their feedback had been included in the assumptions made in relation to changes in green space locations, ease of active travel and access to support the wellbeing of the communities affected.	<p>The Consultation Report, Table 4.4 explains the steps taken to identify and engage with hard-to-reach-groups.</p> <p>A list of 110 hard to reach groups was identified from across the region and all were contacted to offer briefings. In addition, a consultation pack was sent out to all such groups. Five briefings</p>	<p>Consultation Report Annex A [APP-219]</p> <p>Consultation Report Annex B [APP-220]</p>	Under Discussion

		<p>Updated position (Deadline 1): The Applicant in their documentation demonstrated a wide range of organisations contacted. It was unclear from the Consultation Report Annex D Ref Doc 6.1 if any of the response was from these vulnerable groups.</p> <p>The Applicant has shared in the Consultation Report the in Fig 6.1 the targeted consultation zone where vulnerable receptors likely to be using the Riverside Garden Park currently and the new green space to the East.</p> <p>CBC would like to know more detail in regard to any plans for the new green spaces to encourage activities such as nature trails, exercise apparatus, child activities train, and the use of sustainable, natural and recycled materials, that will enhance the experience of using the space and encourage wellbeing.</p>	<p>were held with hard-to-reach organisations during the Autumn 2021 Consultation.</p> <p>For the Summer 2022 Consultation, seven hard-to-reach organisations were identified within the targeted consultation zone. Each group was emailed to advise them of the consultation, and subsequently sent a poster providing details of the consultation. No requests for additional information or briefings were received. These groups were: Surrey Gypsy Traveller Communities Forum; Age UK Horley; Horley Youth Club; 1st & 2nd Horley Scout Group; SeeAbility, Horley Support Service; Gatwick Islamic Centre; and Oakwood School. Consultation Report Figure 6.1 provides a map of the targeted consultation zone.</p> <p>Consultation Report Appendix B.23 provides the list of hard-to-reach organisations; Appendix B.24 is the Hard-to-reach consultation pack; and Appendix C.7 sets out the hard-to-reach poster.</p>	<p>Consultation Report Annex C [APP-221]</p> <p>Consultation Report Annex D [APP-222]</p>	
<p>2.12.2.3</p>	<p>Engagement with affected communities</p>	<p>The DCO application does not evidence engagement with the affected communities and how the outcome of those engagements has influenced the Applicant's assumptions used as a basis for the assessment findings and decisions on mitigation measures to reduce impacts.</p> <p>Updated position (Deadline 1): The consultation reports does demonstrate engagement with the caveat that issues raised above in Row 12.7.</p>	<p>ES Chapter 18: Health and Wellbeing (Doc Ref. 5.1) has taken into account the consultation responses of health stakeholder and the public. The health stakeholders engagement is discussed in ES Appendix 18.3.1 and the consultation responses from the public taken into account are provided in the separate Consultation Report.</p> <p>There have been a comprehensive series of consultation events, including with hard-to-reach groups. Consultation through the DCO process is conducted through a series of statutory defined processes. This includes Section 42 consultation with stakeholders and Section 47 consultation with the public. The Consultation Report discusses the Section 47 engagement with the community for the Autumn 2021 consultation in section 5.6 and for the Summer 2022 consultation in section 6.6. Consultation Report Annex A-D set out the issues raised and the response for each consultation. The responses from these consultations were taken into account the by Chapter 18: Health and Wellbeing.</p> <ul style="list-style-type: none"> Autumn 2021 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A (Doc Ref 6.1) Table A.2 section 'I. Health and well-being' (pdf pages 312-315/362). 	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Appendix 18.3.1: Summary of Stakeholder Responses [APP-203]</p> <p>Consultation Report Annex A [APP-219]</p> <p>Consultation Report Annex B [APP-220]</p> <p>Consultation Report Annex C [APP-221]</p> <p>Consultation Report Annex D [APP-222]</p>	<p>Under discussion</p> <p>Suggest this is merged with the similar issue above.</p>

			<ul style="list-style-type: none"> Summer 2022 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A, Table C.2 section 'I. Health and well-being'. 		
Assessment					
2.12.3.1	Lack of evidence of how local services will be affected	<p>CBC is concerned that the impact of the Project on local health services is currently not considered. This is particularly important, as from practical experience in West Sussex, a higher throughput at Gatwick Airport has often led to an increased demand for health services.</p> <p>Updated position (Deadline 1): The Applicant has consulted with the Sussex ICB.</p>	<p>ES Chapter 18: Health and Wellbeing sets out the effects on local healthcare capacity in Section 18.8, paragraphs 18.8.512 to paragraph 18.8.618. The effects relating to construction and operational workers, as well as passengers are covered. For example, see the analysis of 'Medical Calls and Ambulance Attendances at the Airport' from paragraphs 18.8.530 to 18.8.538. This includes predictions of the number of ambulance transfers from the Airport to hospitals in each assessment year. The analysis is considered robust and indicates the likely demand levels for A&E and secondary care from increased passenger footfall, see Chapter 18, Table 18.8.40.</p> <p>Chapter 18 Table 18.7.1 sets out mitigation measures to avoid significant adverse effects on local healthcare services, including 'healthcare for construction workers' and 'healthcare for airport passengers and visitors'.</p> <p>The Chapter 18 assessment has been informed by a review of medical events and ambulance callout data, as well as discussion with the West Sussex Integrated Care Board on improving access to healthcare for Airport workers.</p>	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p>	Agreed.
2.12.3.2	Lack of evidence to support professional views and assumptions made in the documentation	<p>Evidence used to substantiate assumptions should incorporate feedback from communities likely to be impacted by the Project. For example - it is claimed that expected increases in walking journey times are not considered to be 'onerous' and would contribute to physical activity levels, it is also possible for longer journey times to discourage people from active travel - having a negative and perhaps rebound impact on active travel. There is insufficient information to allow an understanding of the conclusions made around this or if the diversions have disproportionate impacts on certain groups.</p> <p>Updated position (Deadline 1): CBC would wish to understand how the alterations to cycle ways and PROW impact on all future and existing user groups, and how the proposals aim to mitigate such impacts.</p>	<p>ES Chapter 18: Health and Wellbeing sets out the effects of changes in active travel walking and cycling routes in Section 18.8, paragraphs 18.8.310 to paragraph 18.8.360. The issues of potential for disproportioned effects to vulnerable groups and of the potential to discourage people from active travel are specifically considered. For example, see Chapter 18 paragraphs 18.8.337-338 which explains the context of the assessment is of additional journey times of around 10-20 minutes on long-distance routes with constrained alternatives. That these are long-distance routes is important to the population health effect. These are not short-distance routes connecting say residential areas to a school or shops, where lengthy diversions would have the potential for adverse behavioural change in active travel. The acceptability of the routes was reviewed with a site visit and consideration has been given to community engagement responses on this issue and the mitigations proposed through the Outline Public Rights of Way Management Strategy at ES Appendix 19.8.1.</p>	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Chapter 19: Agricultural Land Use and Recreation [APP-044]</p> <p>Consultation Report Annex A [APP-219]</p> <p>Consultation Report Annex B [APP-220]</p> <p>Consultation Report Annex C [APP-221]</p>	Under discussion

			<p>There have been a comprehensive series of consultation events, including with hard-to-reach groups. Consultation through the DCO process is conducted through a series of statutory defined processes. This includes Section 42 Planning Act 2008 consultation with stakeholders and Section 47 Planning Act 2008 consultation with the public. The Consultation Report discusses the Section 47 engagement with the community for the Autumn 2021 consultation in section 5.6 and for the Summer 2022 consultation in section 6.6. Consultation Report Annex A-D set out the issues raised and the response for each consultation. The responses from these consultations were taken into account the by Chapter 18: Health and Wellbeing.</p> <p>The themes of the community response (Section 47) for the Autumn 2021 consultation included interest in improving the operational active travel opportunities of the Project. These are discussed in Chapter 12. The construction did not raise construction stage footpath and cycleway diversions as a theme of concern.</p> <p>The themes of the community response (Section 47) for the Summer 2022 consultation did raise concern about diversions of footpaths and cycleways, albeit not specifically in relation to health effects. These concerns informed the Chapter 19: Agriculture, Land Use and Recreation assessment, which in turn informed the Chapter 12 health assessment. The issues raised are responded to by the Outline Public Rights of Way Management Strategy at ES Appendix 19.8.1. The Chapter 12 health assessment confirms that diversions would be advertised in advance, clearly signposted and comparable in access related considerations.</p> <ul style="list-style-type: none"> • Autumn 2021 consultation Section 42 themes and responses from statutory stakeholders are set out in Consultation Report - Annex A, Table A.1 section 'I. Health and well-being'. • Autumn 2021 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A, Table A.2 section 'I. Health and well-being'. • Summer 2022 consultation Section 42 themes and responses from statutory stakeholders are set out in 	<p>Consultation Report Annex D [APP-222]</p> <p>ES Appendix 19.8.1 Outline Public Rights of Way Management Strategy [APP-215]</p>	
--	--	--	--	---	--

			<p>Consultation Report - Annex A (Doc Ref 6.1) Table C.1 section 'I. Health and well-being' (pdf page 120/222).</p> <ul style="list-style-type: none"> • Summer 2022 consultation Section 47 themes and responses from the public are set out in Consultation Report - Annex A, Table C.2 section 'I. Health and well-being'. • The Outline Public Rights of Way Management Strategy at ES Appendix 19.8.1 responds to the concerns raised in relation to diversions of footpaths and cycleways. 		
2.12.3.3	Impact on primary and secondary care services	Though primary and secondary care services and the estimated impact from construction staff is set out, the increased footfall of passengers when increased flights are operational, and the impact on emergency attendances for this group within secondary care A&E services, is not clear or evidenced satisfactorily.	ES Chapter 18: Health and Wellbeing sets out the effects on local healthcare capacity in Section 18.8, paragraphs 18.8.512 to paragraph 18.8.618. The effects relating to passengers requiring emergency healthcare are covered. For example, see the analysis of 'Medical Calls and Ambulance Attendances at the Airport' from paragraphs 18.8.530 to 18.8.538. This includes predictions of number of ambulance transfers from the Airport to hospitals in each assessment year. The analysis relates to passengers and is based on data held by the Airport, which is the only data source available. Patients are taken to the most appropriate location for their condition. Due to patient confidentiality the NHS does not publish data that would extend this analysis. The analysis is considered robust and indicates the likely demand levels for A&E and secondary care from increased passenger footfall, see Chapter 18, Table 18.8.40.	ES Chapter 18: Health and Wellbeing [APP-043]	Agreed.
Mitigation and Compensation					
2.12.4.1	Loss of public open space	<p>It is stated that as a mitigation measure, new areas will be created to serve all users but will not be immediately contiguous with area lost. This does not provide enough reassurance that mitigation measures will be targeted at communities or groups impacted by the loss.</p> <p>Updated position (Deadline 1): The green space lost to construction at the Riverside Park though in Surrey is accessible to Crawley residents in the North of the County and though being replaced this is an opportunity to ensure the new green space has access to those with disabilities to allow inclusion, independence, and empowerment, encourages community interaction, play and exercise.</p>	<p>ES Chapter 18: Health and Wellbeing sets out the effects of changes in availability of public areas of open space in Section 18.8, paragraphs 18.8.310 to paragraph 18.8.360. Changes in open space are summarised in paragraphs 18.8.333-334. Further detail is provided in ES Chapter 19: Agricultural Land Use and Recreation.</p> <p>The public open space lost from the southern fringe of Riverside Garden Park is associated with the provision of new public open space at the adjacent area of Carpark B, with access provided to ensure the link to Riverside Garden Park is contiguous (see Chapter 18, paragraph 18.8.341).</p> <p>The public open space lost from the southern part of Church Meadows is associated with the provision of new public open space at the adjacent area of land west of the River Mole, with a new footbridge access across the River Mole to ensure the link to</p>	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Chapter 19: Agricultural Land Use and Recreation [APP-044]</p> <p>Consultation Report Annex A [APP-219] Consultation Report Annex B [APP-220]</p> <p>Consultation Report Annex C [APP-221]</p>	Under discussion

			<p>Church Meadows is contiguous (see Chapter 18, paragraph 18.8.342).</p> <p>The locations of new provision and the elements that make the new public open space continuous are a direct response to ensuring that there is easily and equally accessible by current users and communities.</p> <p>Community consultation (Section 47) is set out in the Consultation Report Sections 5.6 and 6.6, as well as Annex A-D.</p>	<p>Consultation Report Annex D [APP-222]</p>	
Other					
2.12.5.1	Lack of an Equality Impact Assessment	<p>Though Equality is stated as a baseline there is no Equality Impact Assessment of the effects of the Project. This would aid in the understanding of how the project may impact on different groups and ensure that certain individuals are not put at a disadvantage or discriminated against as a result of the project activities. This would also ensure that mitigation measures can be tailored to avoid harm to equality.</p> <p>Updated position (Deadline 1): Whilst it is accepted that there is no requirement for GAL to undertake an Equalities Impact Assessment, and Acknowledging there is not a statutory duty on the applicant to undertake a specific Health Impact assessment (HIA), in the case if this project, size, length of construction, proximity to communities and for reaching disruption as well as ongoing operational increase in activity on completion we would recommend a HIA be carried out for each affected LA area.</p>	<p>ES Chapter 18: Health and Wellbeing, Table 18.3.2 notes that: <i>“The ES health assessment considers inequalities. An equality impact assessment relates to the public sector equality duty under the Equality Act 2010. This is not a duty of the applicant.”</i></p> <p>ES Chapter 18: Health and Wellbeing includes specific mitigation targeted to relevant vulnerable population groups to reduce health inequalities and avoid inequitable health outcomes. See Table 18.7.1 and paragraph 18.11.22.</p>	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p>	Under discussion

2.13. Historic Environment

2.13.1 Table 2.13 sets out the position of both parties in relation to historic environment matters.

Table 2.13 Statement of Common Ground – Historic Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
2.13.1.1	Lack of historic background to the airport.	No clear understanding or description of the history of the airport development. Updated position (Deadline 1): CBC fully support this and would suggest a meeting ASAP as this document is vital to the understanding of the archaeological impact of the application.	GAL will be happy to prepare such a report and would suggest discussing it with CBC through the Topic Working Groups (TWGs).	n/a	Under Discussion
2.13.1.2	Lack of archaeological evaluation within the airport perimeter.	The scheme of archaeological investigation undertaken prior to the submission of the DCO application has been focused on areas within the proposed development that were easily accessible and has not covered all potential areas of impact. Updated position (Deadline 1): No written documents have been provided of such a previous agreement and discussions with the previous advisors have indicated they were awaiting information on the historical development of the airport and its potential impact on surviving archaeological deposits. As stated at the single TWG we have attended the document as identified in row 7.2 would provide clarity on those areas previously impacted.	The scheme of archaeological investigation undertaken prior to the submission of the DCO application was developed through discussions with CBC's appointed archaeological advisors and in line with the methodologies approved in writing by those advisors. The issues relating to undertaking archaeological investigation within the perimeter of the airport have been discussed on a number of occasions and it was agreed that such investigation was not necessary. This was due to the land within the airport perimeter having a reduced archaeological potential (as a result of previous development) and/or the lack of impacts arising from the scheme. We would request confirmation from CBC if its position has changed and if so, explain its reasoning why.	ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording - West Sussex [APP-106]	Under Discussion
2.13.1.3	Excluded listed buildings	The Council is disappointed GAL have excluded the 3 existing listed buildings from the current DCO boundary which are within their ownership and shown as part of the project at both the EIA Scoping Stage and PEIR consultation. Their exclusion limits opportunities to fully consider how the DCO works might facilitate mitigation or enhancement to the setting of these assets. Updated position (Deadline 1): CBC identified the three listed buildings within the Development Boundary in paragraph 7.10 of its response to the PEIR. The buildings are: Charlwood Park Farmhouse, Edgeworth House and Wing House.	The Applicant would appreciate clarification regarding the three listed buildings that CBC are referring to, which can be discussed through future TWGs and SoCG discussions.	n/a	Under discussion
Assessment Methodology					
<i>There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.</i>					
Assessment					
2.13.3.1	Impacts on the setting of heritage assets	The Council remains concerned about the impact on the setting of nearby heritage assets as there is no evidence to show that the setting is	ES Chapter 7: Historic Environment provides an assessment of impacts arising from changes within the settings of designated	ES Chapter 7: Historic Environment [APP-032]	Under discussion

		not harmed through visual or light impacts. The proposed control documents such as the DAS and Lighting Strategy do not appear to address these impacts or propose adequate safeguards for these assets.	heritage assets, including listed buildings. Where appropriate, the assessment of visual impacts includes cross-references to visualisations presented in ES Volume 2: Historic Environment Figures. Section 4.9 of the CoCP addresses construction lighting. Paragraph 4.9.5 explains that lighting will seek to avoid intrusion on adjacent buildings and sensitive receptors (such as listed buildings). Paragraph 4.9.17 specifically addresses the issue of light spill with regard to the Church Road (Horley) Conservation Area. Section 6.2 of the Operational Lighting Framework addresses permanent lighting with regards to heritage assets.	ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3) ES Appendix 5.2.2 Operational Lighting Framework [APP-077] ES Historic Environment Figures [APP-054]	
2.13.3.2	Disturbance of archaeological remains	Alternatively, an explanation and evidence should be provided to show why certain works are unlikely to impact significant archaeological remains, either due to modern disturbance, foundation design, or other factors. Further photographic evidence of disturbance and similar evidence would be useful in determining the requirement for any archaeological work in these areas. Updated position (Deadline 1): CBC fully support this and would suggest a meeting ASAP as a document showing this (as has been requested) is vital to the understanding of the archaeological impact of the application.	GAL is happy to discuss the provision of this information, and would suggest discussing it with CBC through the TWGs.	n/a	Under discussion
Mitigation and Compensation					
2.13.4.1	Proposed mitigation on areas already evaluated.	There is concern that the proposed mitigation identified within the WSI on areas that have been evaluated is not sufficient and will need to be expanded. Updated position (Deadline 1): A list of concerns regarding the proposed mitigation method and extent has been provided within the LIR and we would suggest that these can be discussed and hopefully agreed at the next TWG.	GAL requires further clarification from CBC regarding this issue, including the specific areas being referred to and the additional work that is requested. We would request that this aspect is clarified and discussed through future TWGs and SoCG discussions.	n/a	Under discussion
2.13.4.2	Proposed building recording of control tower.	Proposed level 2 recording not appropriate for this type of rare structure. Updated position (Deadline 1): We support the recording of the structure at Level 3.	The level of recording proposed for the former control tower can be increased to Level 3. This will be reflected within a revised version of the WSI for West Sussex. Further clarification is requested from CBC as to what is meant by 'should be identified as a heritage asset'. The former control tower is identified within the submission documents as a building of historic interest, and therefore will be subject to the proposed programme of recording prior to demolition.	ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording - West Sussex [APP-106]	Agreed once WSI revised

			GAL has referred to CBC's maintained list of historic buildings within the Borough. Whilst not statutorily listed, these are considered by the Council to be important due to their architectural, historical or archaeological significance. The former airport control tower was not included on this list.		
2.13.4.3	There needs to be clarity within the documentation on the role of the local authority archaeologist in signing off the archaeological mitigation.	The submitted documentation fails to define a procedure for the monitoring and signing off of the archaeological and building recording mitigation works. Updated position (Deadline 1): CBC agree with GAL's proposition and are happy to discuss this.	GAL is also happy to discuss adding this to the WSI, and suggest it is discussed through future TWGs and SoCG discussions.	ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording - West Sussex [APP-106]	Under discussion
2.13.4.4	Trial trenching	A more extensive programme of archaeological trial-trenching/test pitting is required in advance of construction to accurately assess the presence and survival of archaeological remains in areas to be impacted by the proposed groundworks and allow the creation of an appropriate mitigation strategy. Updated position (Deadline 1): No written documents have been provided of such a previous agreement and discussions with the previous advisors have indicated they were awaiting information on the historical development of the airport and its potential impact on surviving archaeological deposits. As stated at the single TWG we have attended the document as identified in row 7.2 would provide clarity on those areas previously impacted.	The scheme of archaeological investigation undertaken prior to the submission of the DCO application was developed through discussions with CBC's appointed archaeological advisors and in line with the methodologies approved in writing by those advisors. The issues relating to undertaking archaeological investigation within the perimeter of the airport have been discussed on a number of occasions and it was agreed that such investigation was not necessary. This was due to the land within the airport perimeter having a reduced archaeological potential (as a result of previous development) and/or the lack of impacts arising from the scheme. We would request confirmation from CBC if its position has changed and if so, explain its reasoning why.	n/a	Under discussion
2.13.4.5	Mitigations for key archaeological sites	Concerns with proposed recording, excavation (and trenching) and proposed mitigations for key archaeological sites. A list of concerns regarding the proposed mitigation method and extent has been provided within the LIR and we would suggest that these can be discussed and hopefully agreed at the next TWG.	Further clarification is requested from CBC on this issue in order to provide a response.	n/a	Under discussion
Other					
2.13.5.1	Management of Historic Environment effects	Section 5.2 (Historic Environment) of the Code of Construction Practice does not reflect the work proposed. The objective should be to protect or mitigate the setting of built heritage and the recording of affected archaeological deposits. Section 6.1 (Roles and Responsibilities) does not detail a Heritage Clerk of Works.	We consider the suggested change aligns with the text already included within the CoCP, and would be happy to discuss further in a meeting with CBC. As the proposed programme of archaeological investigation and historic building recording is quite limited, the works can be undertaken without a Heritage Clerk of Works.	ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)	Under discussion

		<p>Updated position (Deadline 1): CBC are happy to discuss at the TWG both the wording of the CoCP and the need for a Clerk of Works. The extent of the proposed archaeological programme is at present not agreed but the document proposed under 7.2 will assist these discussions.</p>			
2.13.5.	<p>No proposals for heritage community outreach which would normally be expected from a development of this nature.</p>	<p>No potential heritage community engagement identified in section 4.12.</p> <p>Updated position (Deadline 1): CBC would agree and are happy to discuss further.</p>	<p>GAL is happy to discuss adding a section regarding community engagement within a revised version of the WSI for West Sussex. We would suggest that this addition is discussed and agreed through future TWGs and SoCG discussions.</p>	<p>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording - West Sussex [APP-106]</p>	<p>Under discussion</p>

2.14. Landscape, Townscape and Visual

2.14.1 Table 2.14 sets out the position of both parties in relation to landscape, townscape and visual matters.

Table 2.14 Statement of Common Ground – Landscape, Townscape and Visual Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
2.14.2.1	Conclusions for viewpoints	<p>While the Council has no concern with the methodology applied, there is a lack of detail in the DCO documentation to support the conclusions drawn for some of the viewpoints, in particular in respect of assumptions concerning tree screening. There remain concerns that the visual impacts of some works sites, which are visible from nearby public views, are not adequately controlled or mitigated in any of the control documents.</p> <p>Updated position (Deadline 1): CBC welcome that additional tree survey work is being undertaken to inform the impacts and wish to see this information as soon as possible. Further details of specific areas of concern will be set out in the LIR.</p>	<p>Perimeter hoardings will be included in construction compound layouts to screen low level visual clutter.</p> <p>Main contractor compounds are illustrated in photomontages as temporary maximum parameters (See Figures 8.9.1 to 8.9.128) and assessed within the LTVIA at Chapter 8 of the ES, sections 8.9. and 8.11 as a worse case scenario.</p> <p>The CoCP sets out the general nature of compounds and mitigation measures although does not contain detailed layouts of infrastructure.</p> <p>Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments. The outcome of this work will inform the visual impact assessment.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment is being submitted at Deadline 1.</p>	<p>ES Chapter 8 Landscape, Townscape and Visual Figures - Part 3 [APP-062]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p>	Not Agreed
Assessment					
2.14.3.1	Pentagon Field	<p>The Council is concerned about the use of Pentagon Field site for the deposition of soil, particularly owing to the absence of any certainty over the visual appearance of the site during and post construction.</p> <p>Updated position (Deadline 1): This level of detail is considered insufficient see LIR for further information</p>	<p>Earth shaping illustrated in photomontages (See Figures 8.9.33 to 8.9.40) and assessed during construction and when operational within the LTVIA at Chapter 8 of the ES, sections 8.9. and 8.11. Perimeter hoardings will be included in construction compound layouts to screen low level visual clutter.</p> <p>Landscape proposals are illustrated in ES Appendix 8.8.1 Outline LEMP. Pentagon Field would be returned to grazing land following spoil deposition and woodland belts would be established beside Balcombe Road.</p>	<p>Figures 8.9.33 to 8.9.40 of ES Chapter 8 Landscape, Townscape and Visual Figures - Part 3 [APP-062]</p> <p>ES Appendix 8.8.1 Outline LEMP [APP-113]</p>	Not Agreed

			The CoCP sets out the general nature of compounds and mitigation measures although does not contain detailed layouts of infrastructure.	ES Appendix 5.3.2 Code of Construction Practice [APP-082]	
2.14.3.2	Attenuation features at Car Park Y	The Council wishes to see more detailed information on the likely landscape and visual impacts from the attenuation features proposed at Car Park X (Work No. 31) and Car Park Y (Work No. 30). Updated position (Deadline 1): Please see the LIR for further information requested on these issues	Both are below ground level attenuation features. Implementation of Car Par X would require existing tree group removal and a 24m length of hedgerow which are described/assessed in ES Chapter 8, sections 8.9. and 8.11 and illustrated in wireline photomontages at Figures 8.9.101 to 8.9.104. Implementation of Car Park Y would not require the loss of any existing landscape features.. Effects on visual receptors during construction and operation of the car parks are descibed in ES Chapter 8. No significant effects are identified as a result of these elements of the proposed development. Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments. The outcome of this work will inform any further work required to revisit the landscape and visual impact assessment.	Sections 8.9. and 8.11 of ES Chapter 8 Landscape, Townscape and Visual [APP-033] Photomontages at Figures 8.9.101 to 8.9.104 of ES Chapter 8 Landscape, Townscape and Visual Figures - Part 3 [APP-062]	Under discussion
2.14.3.3	Construction Resources and Waste Management Plan	In the Construction Resources and Waste Management Plan there is no information on the visual impacts from soil excavations or stockpiles on construction compounds or other construction sites, no details on heights or on how such works would be controlled. Updated position (Deadline 1): Further information is requested.	ES Appendix 5.3.2 CoCP Annex 4 Soil Management Strategy does set out general methodologies. It explains that topsoil is to be stored up to 3m high and subsoil to be stored up to 5m high. Individual Soil Management Strategies will be developed for each work area and approved by the relevant LPA (to include specific location, size and shape of soil storage areas).	ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy [APP-086]	Under discussion
2.14.3.4	CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y.	Car Park X and Y works may have potential negative impact on nearby buildings. Please see the landscape and visual impact section of the LIR for further detail on these concerns which has assessed the information in detail.	The assessment of landscape and visual impacts from the proposed attenuation features is contained ES Chapter 8. In summary, the proposed works required for Car Park X would not have any impact on nearby listed buildings. Some removal of the hedgerow boundary on Charlwood Road would be required to widen the existing access point. Sufficient vegetation would be retained to completely screen the development in the summer, with the potential for heavily filtered glimpses of the decking in the winter only, when the vegetation is not in leaf. Vegetation would largely screen any views of the decked car park looking from or across the listed buildings. Existing photography at Viewpoint 26: Bridleway at Poles Lane is included at ES Figure 8.4.31.	Section 6 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147] ES Appendix 11.9.6 Flood Risk Assessment – Annex 1: Fluvial Mitigation Measures Indicative Designs [APP-148]	Not Agreed

			<p>Visualisations showing the winter and summer views along Charlwood Road along with the massing outline of Car Park X are presented as photomontages at ES Figures 8.9.101 to 8.9.104.</p> <p>Car Park Y will be underground storage, therefore after construction, it is expected that there will be negligible landscape and visual impacts during operation.</p>	<p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] and accompanying Figures 8.9.101 – 8.9.104 of ES Landscape, Townscape and Visual Resource Figures [APP-061].</p> <p>ES Appendix Outline Landscape and Ecology Management Plan [APP-113]</p> <p>Para 7.3.3 of ES Appendix 11.9.6 Flood Risk Assessment [APP-147]</p>	
Mitigation and Compensation					
2.14.4.1	Safeguarding of existing landscaping and protection of visual amenities	<p>Lack of detail on landscape protection measures and zonal approach proposed in document is too vague giving inadequate control to safeguard impacts.</p> <p>Updated position (Deadline 1): CBC welcome the opportunity to discuss this matter with the applicant. Further detail of the concerns with the current information provided is detailed in the LIR.</p>	<p>Appendix 8.8.1 Outline LEMP sets the overarching vision for the Project. Figures 1.2.4 to 1.2.15 show Surface Access Landscape Proposals and Annex 4 shows Surface Access Tree Survey and Tree Protection Plans. Land within the DCO boundary has been divided into broad landscape/ecology zones within the outline LEMP, based on existing character which has informed the objectives for future detailed design and management. The obligations within the outline LEMP will be secured through Requirement 8 of the draft DCO.</p> <p>A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences as set out within Requirement 8(1) of the draft DCO. These LEMPs will be in general accordance with the principles in the outline LEMP. The outline LEMP describes the design and maintenance operations and includes reference to BS:3998: Recommendations for tree work and BS 7370-4: Grounds maintenance, the Arboricultural Association Standard Conditions of Contract and Specification for Tree Works. Annex 4 includes Tree Removal and</p>	<p>Figures 1.2.4 to 1.2.15 and Annex 4 of ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 1 [APP-113]</p> <p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 2 [APP-114]</p> <p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 3 [APP-115]</p>	Under discussion

			<p>Protection Plans for the surface access proposals including location and standard specification of tree protection fences. Appendix 5.3.2 CoCP sets out general methodologies and mitigation measures.</p> <p>Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments to include landscape protection measures.</p> <p>The Applicant is happy to discuss these issues further during the TWG process and as the ongoing work to address the issues is progressed.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 4 [APP-116]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p> <p>Requirement 8 of the Draft DCO (Doc Ref. 2.1)</p> <p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	
2.14.4.2	Absence of tree mitigation strategy or any acknowledgement of CBC requirements under policy CH6 in the adopted Crawley Borough Local Plan	<p>There is no recognition of the landscape impact from the loss of trees within the DCO area and no robust measures to mitigate tree removal. Applicant needs to address this key policy and respond in this document and control documents to provide adequate mitigation. Applicant's development should comply with the requirements of policy CH6.</p> <p>Updated position (Deadline 1): CBC welcome the additional tree survey work and will review this when available but wish GAL to fully address CBLP policy CH6 given the extensive tree loss as a result of the project. Further detail is set out in the LIR including some works areas where further detail is needed on tree protection and visual impacts.</p>	<p>Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments. The outcome of this will inform further work to quantify data to inform a response to CBC.</p> <p>The Applicant is happy to discuss these issues further during the TWG process and as the ongoing work to address the issues is progressed.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	Under discussion

2.14.4.3	Lack of controls over visual impacts for some key project sites which are in sensitive locations including those near rights of way or close to the site boundary	<p>Concerns held that there is no control in relation to the townscape /landscape impact (both overall scale, landscape loss and lack of understanding of context) to ensure that future development does not harm the character of the area.</p> <p>Updated position (Deadline 1): This relates to some of the project works and not specifically the works compounds. Further detail is set out in the LIR</p>	<p>Airfield and Highway construction compounds options were assessed within Appendix 3.5.1 Options Appraisal Tables. Potential landscape and visual impacts were identified and included as environmental considerations.</p> <p>Perimeter hoardings are included in compound layout to screen low level visual clutter.</p> <p>Main contractor compounds are illustrated in photomontages as temporary maximum parameters to represent a worse case scenario. (See Figures 8.9.1 to 8.9.128) and assessed within the LTVIA at Chapter 8 of the ES, sections 8.9. and 8.11. The CoCP sets out the general nature of compounds and mitigation measures, although do not contain detailed layouts of infrastructure.</p> <p>(Further information relevant to this response is provided in the response to Table 9 Landscape Reference 9.13 and 9.28)</p> <p>The Applicant is happy to discuss the wording of the CoCP through the TWG's and any further information required as part of the SoCG process.</p>	<p>ES Appendix 3.5.1 Options Appraisal Tables [APP-073]</p> <p>Figures 8.9.1 to 8.9.128 ES Chapter 8 Figures Part 3 [APP-062].</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p>	Under discussion
2.14.4.4	Draft Development Consent Order, Requirements and Schedule 11 documents	<p>Concern remains in relation to the controls to ensure the visual impacts of the development are appropriately mitigated.</p> <p>Updated position (Deadline 1): CBC welcome the opportunity to discuss this matter further. The current information is not considered adequate.</p>	<p>The obligations within the outline LEMP will be secured through Requirement 8 of the draft DCO. A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.</p> <p>The Applicant is happy to discuss the wording of the draft DCO and any further information required as part of the SoCG process.</p>	<p>ES Appendix 8.8.1 Outline LEMP. [APP-113]</p> <p>Requirement 8 of the Draft DCO (Doc Ref. 2.1)</p>	Under discussion
2.14.4.5	Planning Statement Para 8.17.11	<p>It is not clear how the mitigation referred to in para 8.17.11 (Artificial Light, Smoke and Steam) will be secured.</p> <p>Updated position (Deadline 1): CBC welcome the opportunity to discuss this matter further.</p>	<p>The Applicant is happy to discuss the wording of the draft DCO and any further information required as part of the SoCG process.</p>	<p>Requirement 8 of the Draft DCO (Doc Ref. 2.1)</p>	Under discussion
2.14.4.6	Design and Access Statement	<p>Control documents such as the Outline Landscape and Ecology Management Plan (oLEMP) lack detail on landscape protection measures, mitigation for ecology, heritage, drainage and visual impacts. The zonal approach adopted is considered too vague and the document as worded would not give a local planning authority adequate control to safeguard these impacts during the project.</p>	<p>Appendix 8.8.1 Outline LEMP sets the overarching vision for the Project. Land within the DCO boundary has been divided into broad landscape/ecology zones within the outline LEMP, based on existing character which has informed the objectives for future detailed design and management. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project will be</p>	<p>ES Appendix 8.8.1 Outline LEMP [APP-113]</p> <p>ES Appendix 5.3.2: Code of Construction</p>	Under discussion

		<p>Updated position (Deadline 1): CBC would welcome further discussion on this matter, details to be provided within the LIR</p>	<p>submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.</p> <p>The outline LEMP describes the design and maintenance operations and includes reference to BS:3998: Recommendations for tree work and BS 7370-4: Grounds maintenance, the Arboricultural Association Standard Conditions of Contract and Specification for Tree Works. Annex 4 includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences. Appendix 5.3.2 CoCP sets out general methodologies and mitigation measures.</p> <p>(Issues Tracker refs. 9.24 to 9.27).</p> <p>Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments. The outcome of this will inform further work to quantify data to inform a response to CBC.</p> <p>The Applicant is happy to discuss these issues further during the TWG process and as the ongoing work to address the issues is progressed.</p> <p>Updated position (Deadline 1): A Tree Survey Report and Arboricultural Impact Assessment and an Arboricultural Method Statement is being submitted at Deadline 1.</p>	<p>Practice (Doc Ref. 5.3)</p> <p>Requirement 8 of the Draft DCO (Doc Ref. 2.1)</p> <p>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment (Doc Ref. 5.3)</p> <p>ES Appendix 5.3.2: Code of Construction Practice – Annex 6: Arboricultural Method Statement (Doc Ref. 5.3)</p>	
Other					
2.14.5.1	Inconsistencies	<p>There are inconsistencies between the documents referenced in the main statement and the corresponding appendices.</p> <p>Updated position (Deadline 1): There are numerous inconsistencies between documents, CBC will raise those that arise during ongoing discussion but GAL should check their documentation to address them all.</p>	<p>No reference is provided as to what these inconsistencies are. The Applicant is happy to discuss the nature of these issues further during the TWG process and provide any further information required as part of the SoCG process.</p> <p>Updated position (Deadline 1): In the Applicant’s response to Procedural Deadline A, the Applicant submitted an updated Project Description Signposting Document, updated Draft DCO and updated ES Chapter 5: Project Description to address any inconsistencies in terminology. The Local Authorities are asked to advise if it has any outstanding queries taking account of these submissions.</p>	<p>Draft DCO (Version 3) [PDLA-004 to PDLA-005]</p> <p>Project Description Signposting Document (Version 1) [PDLA-011]</p> <p>ES Chapter 5: Project Description (Version 2) [PDLA-006 to PDLA-007]</p>	Under discussion

2.15. Major Accidents and Disasters

2.15.1 **Table 2.15** sets out the position of both parties in relation to major accidents and disasters matters.

Table 2.15 Statement of Common Ground – Major Accidents and Disasters Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Major Accidents and Disasters within this Statement of Common Ground.</i>					

2.16. Noise and Vibration

2.16.1 Table 2.16 sets out the position of both parties in relation to noise and vibration matters.

Table 2.16 Statement of Common Ground – Noise and Vibration Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
2.13.2.1	Assessment periods	<p>Table are provided for daytime and night-time construction noise predictions. However, no identification of evening construction works has been provided.</p> <p>Updated position (Deadline 1): Clarification is required of construction noise assessment information presented in paragraphs 14.9.5 to 14.9.12 [APP-039] as it does not seem to correlate with the identification of likely significant effects.</p> <p>Alignments and heights of noise barriers used to reduce significant noise effects should be provided and a commitment made to secure provision of noise barriers.</p>	<p>ES Appendix 14.9.1: Construction Noise and Vibration describes the Construction Noise Model identifying assumptions on the plant used, for which construction activities and in which period (day, evening, night). All evening works are also likely at night and have been assessed at night as a worst case.</p> <p>Tables 14.9.1 and 14.9.2 provide predicted levels of construction noise for 24 periods during construction at community receptors in each of 12 receptors Areas, for daytime and night-time.</p> <p>Paras 14.9.5 and 14.9.46 of ES Chapter 14: Noise Vibration explain that construction will be carried out in accordance with ES Appendix 5.3.2 Code of Construction Practice. Table 14.9.3 of Chapter 14, identifies relevant “Best Practical Means” measures which will be adopted. Where noise barriers have been identified as practicable they have been included within the assessment as discussed in paras 14.9.50 – 14.9.52.</p>	<p>ES Appendix 14.9.1: Construction Noise and Vibration [APP-171]</p> <p>Tables 14.9.1, 14.9.2, 14.9.3 and paras 14.9.5 and 14.9.46 and 14.9.50 to 14.9.52 of ES Chapter 14: Noise Vibration [APP-039]</p> <p>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</p>	Not Agreed
2.13.2.2	No assessment criteria is provided for the assessment of effects on non-residential receptors.	<p>Assessment criteria based around the LOAEL and SOAEL focuses on noise effects at residential receptors. Non-residential receptors should be considered on a case-by-case basis with assessment criteria defined depending on the non-residential use.</p> <p>Updated position (Deadline 1): Paragraph 14.4.76 [APP-039] states: “For non-residential buildings specific noise assessment criteria are used where significant noise increases are expected above the threshold levels described above, with reference to their particular use, design and circumstances”.</p> <p>No specific noise assessment criteria for non-residential receptors are defined. Additionally, the assessment of non-residential receptors is included in secondary noise metrics, which the Applicant identifies are not for identifying significant effects and are for context only.</p>	<p>The methodology for assessing non-residential receptors is summarised in ES para 14.4.76. Non-residential noise sensitive receptors include: Educational facilities (schools, colleges, nurseries) doctors medical centres, hospitals, auditoria (concert halls, theatres, sound recording and broadcasting studios), places of worship, offices, museums, community and village halls, courts, libraries, hotels etc. Noise assessment criteria for these can be drawn from various guidelines and in all cases are $L_{eq\ 16\ hour}$ 50dB or 55dB. Noise change criteria for significant effects are in all cases 3dB or more. Hence, it is reasonable to use the residential $L_{eq\ 16\ hr}$ 51dB LOAEL as a scoping threshold for non-residential receptors. As noted in ES para 14.4.76 for non-residential buildings, sensitivity to noise tends to depend not just on the building use, but also its construction and other factors. Therefore, where noise levels</p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p>	Not Agreed

			<p>above the scoping criterion are identified they are assessed in a case by case basis.</p> <p>Construction noise has been modelled at all buildings regardless of use. The residential daytime and where relevant night-time LOAEL was used to scope impacts at all receptors including non-residential. Paragraphs 14.9.17 to 14.9.43 identify various schools, churches, open spaces, hotels and offices where these could be exceeded and Table 14.9.4 identified mitigation and on a case by case basis where impacts are likely.</p> <p>Non-residential receptors were considered in assessing the worst affected properties for baseline surveys, with measurements carried out and used to characterise the ambient noise levels at non-residential receptors in two of the 13 Noise Sensitive Receptor Areas used in the ground noise assessment. Ground noise has been modelled at all buildings regardless of use. The residential LOAELs were used to scope impacts at all receptors including non-residential. Appendix 14.9.3 provides predicted noise levels at schools, offices, a care home and an aquatic centre and assesses impacts where relevant on a case by case basis.</p> <p>The air noise assessment provides modelled noise levels at non-residential properties to scope impacts above the residential LOAELs. Figure 14.9.32 (Doc Ref. 5.2) shows 50 noise sensitive community buildings (21 schools, one hospital, 18 places of worship and 7 community buildings) for which noise levels are predicted and assessed. The seven Community Representative Locations chosen to describe impacts in more detail in para 14.9.150 to 14.9.158 are non-residential (6 schools and one care home).</p> <p>Road traffic noise has been modelled at all buildings regardless of use. The residential LOAELs were used to scope impacts at all receptors including non-residential. Noise changes in the Riverside Garden Park have been assessed in detail. Potential noise impacts at two hotels and the Gatwick Airport Police Station are assessed on a case by case basis.</p>		
<p>2.13.2.3</p>	<p>Only 2032 assessment year is assessed as a worst-case</p>	<p>The assessment of air noise only covers 2032 as it is identified as the worst-case; however, identification of significant effects for all assessment years should be provided.</p> <p>Updated position (Deadline 1): All assessment years (2029, 2032, 2038 and 2047) should be covered in the assessment within the ES chapter to understand temporal effects on the local population.</p>	<p>The noise modelling method is summarised in Section 2 of Appendix 14.9.2 and was explained in a CAA ERCD presentation and slide deck hand out to the TWG on 7th June 2022.</p> <p>GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios modelled and reported in the ES. These comprise:</p>	<p>ES Noise and Vibration Figures Part 1 [APP-063]</p> <p>ES Noise and Vibration Figures Part 2 [APP-064]</p>	<p>Not Agreed</p>

			<ul style="list-style-type: none"> 8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, Lmax and overflights; 5 assessment years – 2019, 2029, 2032, 2038 and 2047 2 Fleet transition scenarios, the Central Case and Slower Transition Case. <p>These are presented in 71 figures in the ES relating to air noise impacts with the data tabulated in Appendix 14.9.2. LPAs have been given access to an air noise web viewer to download air noise contours. This is considered a suitable set of noise modelling scenarios to allow the ES as written to describe the likely significant effects of the Project.</p>	<p>ES Noise and Vibration Figures Part 3 [APP-065]</p> <p>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</p>	
2.13.2.4	The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment. It is not clear why 2032 is considered worst-case for ground noise. Ground noise contours are not provided	<p>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.</p> <p>Whilst 2032 provides the highest absolute noise levels, there appears to be larger increases in noise at some receptors during other assessment years. Noise contours have been provided for aircraft noise and road traffic noise, but no noise contours are provided for ground noise. These contour plots should be provided to allow better understanding of ground noise effects for each assessment year and scenario. It would be expected that LAeq and Lmax contour plots are provided.</p> <p>Updated position (Deadline 1): Further information on ground noise in the slower fleet transition case is awaited.</p> <p>However, ground noise impacts should be considered as a change in ground noise as a result of the proposed expansion, and ground noise contours should be provided to aid the understanding of ground noise impacts.</p>	<p>A sensitivity test of taxiing noise modelling with the slower transition fleet will be provided.</p> <p>Ground noise impacts are generally determined by the extent to which ground noise exceeds ambient noise, usually road traffic noise, so ground noise impacts are greatest when ground noise levels are highest in 2032.</p> <p>Ground noise contours were discussed with the TWG. Because ground noise impacts are determined by the change in ground noise and the extent to which it exceeds ambient noise, contours of ground noise levels can be misleading and are not considered helpful to depict area of impact in the ES.</p>	n/a	Not Agreed
2.13.2.5	LOAEL at sensitive receptor locations	<p>For construction noise, no information is provided on how the LOAEL is defined at sensitive receptor locations in accordance with Table 14.4.4.</p> <p>Updated position (Deadline 1): The process when defining LOAEL and SOAEL should be detailed including ambient noise levels at each receptor group and the corresponding ABC defined construction noise thresholds for relevant time periods.</p>	<p>Paragraphs 14.9.8, 14.9.9, 14.9.13 and 14.9.14 of the ES Chapter 14 give construction noise LOAELs and SOAELs. These are derived from Table 14.4.4 using baseline noise levels that were either measured in 2016 or modelled in the road traffic noise baseline model rounded to the nearest 5dB as required in the BS5228 ABC method.</p>	<p>Paragraphs 14.9.8, 14.9.9, 14.9.13 and 14.9.14 of ES Chapter 14 Noise and Vibration [APP-039]</p>	Not Agreed
2.13.2.6	Construction activities	<p>It is unclear what construction activities are occurring within each assessment scenario.</p>	<p>This issue has been responded to previously at Row 13.40 of Table 13 in Appendix 1.</p> <p>Paragraphs 14.9.1 to 14.9.3 of ES Chapter 14 explain how one or more of 17 activities has been modelled at each of 170 areas of</p>	<p>Paragraphs 14.9.1 to 14.9.3 of ES Chapter 14 Noise and Vibration [APP-039]</p>	Not Agreed

		<p>Updated position (Deadline 1): There is no information on what construction activities are taking place during each modelled scenario. This information should be presented clearly in the ES.</p>	works within one or more of 24 periods across the 15 year construction programme from 2024 to 2038. There is no more concise and clear way to present this in an ES. In the TWG on 4 th January 2023 we showed the construction noise model and examples of the activities in some works areas. Further examples of the construction noise model can be shown to the TWG.		
2.13.2.7	Validation	<p>Details of the validation and noise modelling processes, along with any assumptions and limitations applied should be provided.</p> <p>Updated position (Deadline 1): Details of fleet should be submitted as part of the application alongside details of the validation and noise modelling processes with any noise model assumptions and limitations.</p>	This relates to air noise modelling. Tables of aircraft movements by aircraft type for each noise assessment case (i.e. year, metric, fleet) will be provided to the TWG, see below response to Row 13.18.	n/a	Not Agreed
2.13.2.8	Engine ground running	It is not clear if engine ground running, auxiliary power unit and engine around taxi noise is included in LAeq,T ground noise predictions. Consequently, ground noise LAeq,T levels may be understated. All ground noise sources should be included in LAeq,T predictions covering a reasonable worst-case day.	A technical note will be provided to the TWG providing further details of engine ground running noise levels which demonstrates their contribution to Leq levels will be insignificant.	n/a	Under discussion
2.13.2.9	Engine ground run noise	The ground noise assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB LAmax predictions by identifying car pass-by LAmax levels of 80 dB. However, there is no attempt to contextualise LAmax engine ground running noise at any other receptor location. The assessment of engine ground run noise should cover all assessment locations.	A technical note will be provided to the TWG providing further details of engine ground running noise levels at other receptor locations which demonstrates the Project will not give rise significant effects from engine ground running.	n/a	Under discussion
2.13.2.10	SOAEL for both scenarios	The Central Case has been considered for the ground noise assessment; however, 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. Ground noise emissions during the Slower Transition Case should be assessed.	A sensitivity test will be undertaken for the Slower Transition Fleet case for ground noise. The results of this test will be analysed and presented in the form of a technical note that will be shared with the local authorities.	n/a	Under discussion
2.13.2.11	Fire training activities	<p>It is not clear if fire training activities at the new fire training ground are considered as part of the ground noise assessment. Noise emissions from fire training ground activities should be assessed.</p> <p>Updated position (Deadline 1): The statement that they are not expected to contribute needs evidence to back it up.</p> <p>Predicted levels from the fire training activities should be provided, through their inclusion in the ground noise model to represent a reasonable worst-case.</p>	The fire training ground will be re-located to be about 200m north of the Northern Runway within the air noise Leq 69dB daytime noise contour, and over 300m from the nearest noise sensitive receptor with 10m bunding screening noise propagation as described in Table 14.8.3 of Chapter 14 of the ES. Fire training activities will be in daytime only and are not expected to give rise to noise levels higher than taxiing or airborne aircraft at nearest receptors, so are not expected to give rise to significant noise effects.	Table 14.8.3 of ES Chapter 14 Noise and Vibration [APP-039]	Not Agreed
2.13.2.12	Slow transition case to define noise contour limits	It is not appropriate to use the slow-transition case to define noise contour limits. There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the noise envelope allows for an increase in noise contour area on opening of the northern runway.	We have explained within the Noise Envelope Group on several occasions that GAL does not control airline fleet procurement and that the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet	<p>ES Appendix 14.9.5: Air Noise Envelope Background [APP-175]</p> <p>ES Appendix 14.9.9: Report on</p>	Not Agreed

		<p>There should be no increase in noise limit from the 2019 baseline noise contour areas. Noise controls should be included to achieve this, and a demonstration of their effectiveness provided.</p>	<p>procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted 'We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case'.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <ol style="list-style-type: none"> 1. This has been discussed as part of the Noise Envelope Group. Engagement on the Noise Envelope is set out in ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179) pages 165 to 175 provide GAL's illustration of sharing the benefits. 2. Section 8 of the Noise envelope provides a review process to enable this. 3. Section 7 of the Noise Envelope provides the actions that must be taken. 4. Sections 7 and 8 of the Noise Envelope describe how it will be managed and enforced including the role of the CAA as Independent reviewer and the Secretary of State as necessary. 5. Whilst Section 7 provides some ways in which compliance will be achieved, GAL will have other methods available, e.g. as included in the adopted 2019-2024 and draft 2025-2029 Noise Action Plans under the Environmental Noise (England) Regulations 2006, and others that make use of emerging technologies. 6. The Night Flight Restrictions are administered by the DfT and this will continue if there is a Noise Action Plan, quite separately. See Section 2 of the Noise Envelope. 7. An extensive programme of consultation was undertaken in summer 2022. See ES Appendix 14.9.9 Report on Engagement on the Noise Envelope and Appendix 14.9.8 Noise Envelope Group Output Report. 8. In the PEIR GAL outlined a Noise Envelope and invited suggestions. Discussions in the Noise Envelope Group provide opportunities for local community groups and other stakeholders to suggest details of the noise envelope and numerous suggestions were made and considered. See ES Appendix 14.9.9 Report on Engagement on the Noise 	<p>Engagement on the Noise Envelope [AS-023]</p> <p>ES Appendix 14.9.8: Noise Envelope Group Output Report [APP-178]</p>	
--	--	---	---	--	--

			Envelope and Appendix 14.9.8 Noise Envelope Group Output Report. GAL has consulted on the noise envelope through the PEIR as well as the Noise Envelope Group and with local authorities through the TWGs.		
Assessment					
2.13.3.1	Assessment of vibration effects from road construction	The construction vibration assessment only considers effects from sheet piling and does not consider vibration effects from vibratory compactors and rollers used in highway construction	Vibratory compactors and rollers used in the highway construction are not expected to be sufficiently close to noise sensitive receptors to give rise to significant vibration effects. A note providing further details on the use of vibratory compactors and rollers will be provided to the TWG.	n/a	Under discussion
2.13.3.2	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 _{max} , overflight, L _{den} and L _{night} noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear. Updated position (Deadline 1): Supplementary noise metrics should be used supplement the primary metric assessment to identify likely significant effects.	Paragraph 14.4.79 of the ES explains: <i>The assessment of significance is based primarily on the predicted levels and changes in the primary noise metrics and the factors described above, but additional noise metrics (the secondary noise metrics) are used to provide more detail on the changes that would arise.</i>	Para 14.4.79 of ES Chapter 14: Noise and Vibration [APP-039]	Not Agreed
2.13.3.3	Sharing the benefits	Paragraph 14.2.44 – sharing the benefits has been removed from the ES. This is a fundamental part of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities. There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the Noise Envelope allows for an increase in noise contour area on opening of the Northern Runway. The Applicant 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 technology should be covered within the constraints of the Noise Envelope. Updated position (Deadline 1): Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case. There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels.	Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022. An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope. As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted ' <i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i> '.	Section 3.2 of ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]	Not Agreed

			<p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections 6.5 and 6.6 of the Noise Envelope Document.</p>		
2.13.3.4	Changes in noise levels	<p>For the ground noise and air noise assessments, changes in noise should be identified for receptors/ population experiencing noise levels between LOAEL and SOAEL and for those experiencing noise levels exceeding SOAEL.</p> <p>Updated position (Deadline 1): Table 14.9.10 and Table 14.9.11 should be updated to show population exposed to changes in noise between LOAEL and SOAEL and above SOAEL.</p>	<p>For air noise, Tables 14.9.10 and 14.9.11 of ES Chapter 14 give the populations predicted to have various changes in noise from across 9 ranges. Only noise levels above LOAEL are reported.</p> <p>Paragraphs 14.9.102 to 14.9.104 describe where these significant changes are expected. 40 have changes above 3dB all above SOAEL. 40 have changes of 1dB above SOAEL. These are the 80 significantly affected by the Project.</p> <p>For ground noise the changes in noise and whether they are above LOAEL and/or SOAEL are described in the Section 8.1 of ES appendix 14.9.3 across each of the 12 noise sensitive receptor areas.</p>	<p>Paragraphs 14.9.102 to 14.9.104 and Tables 14.9.10 and 14.9.11 of ES Chapter 14 Noise and Vibration [APP-039]</p> <p>Section 8.1 of ES Appendix 14.9.3 Ground Noise Modelling [APP-173]</p>	Not Agreed
2.13.3.5	New receptors	<p>Receptors newly experiencing 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.</p> <p>Updated position (Deadline 1): This information should be provided in the ES so it is clear and understandable</p>	<p>The increase in the population within SOAEL with the Project compared to without the Project in the noisiest year, 2032, can be seen by subtracting the population in Table 14.6.5 (baseline) from those in Table 14.9.7 (with Project). For both day and night, central case fleet and slower transition fleet this gives a population of approximately 100. All properties forecast to be above SOAEL with the Project in the noisiest year, 2032, with the slower transition fleet will be offered the Inner Zone noise insulation package consistent with the policy requirement to avoid significant adverse effects on health and quality of life.</p>	<p>Tables 14.9.5 and 14.9.7 of ES Chapter 14 Noise and Vibration [APP-039]</p>	Not Agreed
2.13.3.6	Secondary metrics	<p>Context to the aircraft noise assessment is provided through consideration of the secondary metrics; however, no conclusions on how the secondary metrics relate to likely significant effects have been made, so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.</p> <p>Updated position (Deadline 1): Response is not relevant.</p>	<p>Paragraphs 14.9.1 to 14.9.3 of ES Chapter 14 explain how one or more of 17 activities has been modelled at each of 170 areas of works within one or more of 24 periods across the 15 year construction programme from 2024 to 2038. There is no more concise and clear way to present this in an ES. In the TWG on 4th January 2023 we showed the construction noise model and examples of the activities in some works areas. Further examples of the construction noise model can be shown to the TWG.</p>	<p>Paragraphs 14.9.1 to 14.9.3 of ES Chapter 14 Noise and Vibration [APP-039]</p>	Not Agreed

2.13.3.7	Secondary metrics	<p>Context to the ground noise assessment is provided through consideration of the secondary metrics; however, no conclusions on how secondary metrics relate to likely significant effects have been made, so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.</p> <p>Updated position (Deadline 1): Paragraph 14.4.84 [APP-039] states that: “Lmax levels have also been used to assist in determining significance of effects for particular intermittent noise sources such as Engine Ground Running and use of EATs.</p>	<p>Paragraph 14.4.96 of ES Chapter 14 explains: ‘As for air noise, the assessment of significance is based primarily on the predicted levels and changes in the primary noise metrics, and the secondary noise metric Lmax is used to provide more detail on the changes that would arise, including changes in the number of noise events.’</p>	<p>Paragraph 14.4.96 of ES Chapter 14 Noise and Vibration [APP-039]</p>	Not Agreed
Mitigation and Compensation					
2.13.4.1	Noise monitoring duration	<p>One 20-minute survey and one 10-minute survey is not sufficient to provide data suitable for validation of the road traffic noise model and indeed these data are not used as such. There is therefore no validation of the road traffic noise model in terms of measured levels.</p>	<p>The noise surveys carried out in Riverside Garden Park were undertaken to better understand the overall noise environment in the park, not to calibrate the road traffic noise model. The road traffic noise model results have been reviewed by AECOM. In the TWG meeting on 29/11/2022 the applicant responded to various queries on the traffic noise model raised by two traffic noise modelling experts from AECOM.</p> <p>The 2016 ground noise baseline noise survey included 2 sites near the A23 where traffic noise was measured over period of approximately 2 weeks. The survey results compare well with baseline traffic noise modelling results. These results will be provided in a technical note shared with NH and the TWG.</p>	n/a	Under discussion
2.13.4.2	CAA to regulate the Noise Envelope	<p>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.</p> <p>Updated position (Deadline 1): The Host Authorities should be part of an independent group set up to regulate the Noise Envelope.</p>	<p>The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA’s may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA’s will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA’s. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.</p>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p> <p>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]</p>	Not Agreed
2.13.4.3	Prevention of breaches	<p>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. No details are provided on what kind of actions are proposed for an action plan to achieve compliance.</p> <p>24 months of breach would be required before capacity declaration restrictions for the following were adopted so it would be three years after</p>	<p>As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year’s performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of</p>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	Not Agreed

		<p>the initial breach before capacity restrictions were in place. Capacity restrictions would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year.</p> <p>Updated position (Deadline 1): Capacity restrictions are not considered sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	<p>further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.</p>		
2.13.4.4	Noise insulation scheme details	<p>How would the noise insulation scheme prioritise properties for provision of insulation. 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.</p> <p>Is noise insulation in the Outer Zone restricted to ventilators or will the occupier have flexibility to make alternative insulation improvements? 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. It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.</p> <p>Updated position (Deadline 1): Details of the noise insulation roll out should be provided including a market test the availability of contractors and insulation materials.</p> <p>Ventilators do not deal with the issue of overheating, which would occur if windows are required to be closed to achieve good acoustic conditions. Two locations are mentioned for monitoring, but there is no information regarding how other locations be screened for monitoring. A commitment should be made for annual monitoring of combined air noise and ground noise levels at specified locations to test whether properties would qualify for insulation.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>	Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 Noise Insulation Scheme [APP-180]	Not Agreed

2.13.4.5	Fixed Plant Noise	No mechanism for securing fixed plant limits for any future assessment of fixed plant noise is provided and fixed plant noise limits should apply to cumulative levels of fixed plant noise and not to “any” fixed plant.	Noted, the noise limits provided should apply to all the Project’s fixed noise sources together not any one separately. We would envisage a monitoring report being provided to CBC following commissioning of the plant. GAL will consider how these limits can be secured within the Draft DCO.	n/a	Under discussion
2.13.4.6	Eligibility for noise 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.	That is the case. An Appendix to the NIS will be provided giving further details on its implementation and clarifying this.	n/a	Under discussion
2.13.4.7	Annual noise contour limits	The use of annual noise contour limits, in addition to noise limits covering the 92-day summer period, would provide confidence that noise would be controlled outside the 92-day summer period. Updated position (Deadline 1): Further discussion necessary.	Notwithstanding the explanation provided, annual Lden and Lnight contours are provided for baseline and with Project conditions in Section 14.6 and 14.9 of ES Chapter 14 to illustrate noise changes over the whole year including the winter months. <ul style="list-style-type: none"> Section 4 of Appendix 14.9.2 provides tables of annual Lden and Lnight. Figures 14.9.28 and 14.9.39 show annual Lden and Lnight contours. Para 14.9.136 to 14.9.139 discuss the changes in annual Lden and Lnight contours compared to the changes in summer season Leq 16 hr and Leq 8 hour night contours. <p>Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements.</p>	Section 14.6 and 14.9 of ES Chapter 14: Noise and Vibration [APP-039] ES Appendix 14.9.2: Air Noise Modelling [APP-172] ES Appendix 6.2.1: Scoping Report [APP-092] and APP-093 ES Chapter 4: Existing Site and Operation [APP-029]	Under discussion
2.13.4.8	Noise Envelope	The Noise Envelope should provide certainty about the levels of noise which can be expected in the future in accordance with CAP 1129; however, the Noise Envelope allows for noise contour limits to increase as a result of airspace changes and new aircraft technology. There should be no allowance for noise contour area limits to increase. Updated position (Deadline 1): There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels.	The Noise Envelope provides certainty for the periods which it is set in accordance with CAP1129. The noise envelope should reflect evidence of the improvements in average fleet noise performance over time and should not function to prevent airlines serving changing markets or introducing new carbon-efficient aircraft. There may also be extraordinary circumstances in which it could be necessary to review the noise envelope limits upwards. These points are fully as described in Sections 6.3 to 6.7 of the Noise Envelope. Any change to the noise envelope would require a formal review following the processes laid out in Section 8, including consultation and approval of the Secretary of State.	Sections 6.3 to 6.7 and Section 8 of ES Appendix 14.9.7 The Noise Envelope [APP-177]	Not Agreed

2.13.4.9	Local authority involvement in Noise Envelope	<p>The local authorities should have a role in the Noise Envelope that involves reviewing and approving submissions. This role should allow action to be taken in the event of a breach.</p> <p>Updated position (Deadline 1): The Host Authorities should be part of an independent group set up to regulate the Noise Envelope.</p>	<p>During consultation with the TWGs and the Noise Envelope Group (NEG) in summer 2022 the local authorities were consulted on the concept and make-up of a “Review Body” which would review and approve the outputs from the noise envelope when it becomes active. GAL’s proposal for a sub-committee of GATCOM was opposed by the LPAs. The suggestion of having Local Authorities as the “Review Body” was also discussed during the NEG meetings and there was concern on the part of Community Representatives regarding there being a conflict of interest between economic benefit in that some councils receive money from the Airport as part of the S106 agreement but are impacted little by the noise from airlines using the airport. There was no clear resolution on the issue within the NEG and GAL subsequently decided that the CAA would be best placed to perform the function of Independent Reviewer as explained in ES Appendix 14.9.7: The Noise Envelope. The Local Authorities can monitor the outputs of the review process and in the case of a breach take enforcement action as appropriate.</p>	<p>ES Appendix 14.9.7 The Noise Envelope [APP-177]</p>	Not Agreed
Other					
2.13.5.1	Local planning policies	<p>Local planning policies are covered in Table 14.2.2 but no information is provided on how these policies are addressed in the ES.</p> <p>Updated position (Deadline 1): Local planning policies should be covered in detail with information provided regarding where they have been addressed in the ES.</p>	<p>The relevant planning policies relating to noise and vibration have been identified in the assessment and reference to them is made where relevant in the ES, e.g. Planning Advice Document Sussex is used to assess fixed sources of ground noise, see para 7.1.2 of ES Appendix 14.9.3: Ground Noise Modelling. Planning policies and how they addressed in relation to the application is principally addressed in the Planning Statement.</p>	<p>ES Appendix 14.9.3: Ground Noise Modelling [APP-173]</p> <p>Planning Statement [APP-245]</p>	Not Agreed
2.13.5.2	No details of the noise modelling or validation process are provided. No details of measured Single Event Level or LASmax noise data from the Noise-Track Keeping are provided.	<p>It is difficult to have any confidence in the noise model without any provision of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours. Measured Single Event Level and LASmax noise data should be provided for individual aircraft variants as it is key information used when defining the aircraft noise baseline.</p> <p>Updated position (Deadline 1): The use of ANCON is not disputed; however, the level of detail provided on air noise modelling is not adequate for a DCO application. Details should be provided on measured SEL and LAm_{ax} for each aircraft variant at each monitoring location along with user-defined approach and departure profiles for each aircraft variant. Details should be provided regarding the numerical accuracy of predictions in comparison to measured LAm_{ax} and SEL for each aircraft at each monitoring location.</p>	<p>CAA ERCD gave a presentation to the TWG on 7th June 2022 on the ANCON model and its validation, and it was discussed at the TWG. The slide deck provided for this meeting included SEL and Lmax levels from the Gatwick NTK and how they are used to validate the model every year. Further information has been added to the ES Appendix 14.9.2 Section 2.1 describing the air traffic forecasts used, the distribution across routes and runways, flight dispersion adopted, height and speed profiles, source terms for next generation aircraft and the ANCON model and referring to <i>ECRD Report 2002: Noise Exposure Contour for Gatwick Airport 2019</i> for further details.</p> <p>ERCD has been producing noise contours for Gatwick Airport using the ANCON model since 1988 including annual contours every year. Up until 2015 the contours were produced for the DfT, and since then they have been carried out for GAL. ERCD has a team who maintain the model and calibrate it for Gatwick Airport using thousands of data points every year. ANCON is used on other UK</p>	n/a	Not Agreed

			airports as well as for international studies, and is considered the most accurate tool available to model noise from Gatwick Airport. it is strongly refuted that it is difficult to have confidence in the noise model based on the information provided.		
2.13.5.3	Aircraft fleets in summer period	<p>Aircraft fleets are not provided for the 92-day summer period. It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets. Aircraft fleets used in noise models should be provided along with how the fleet is split between the two runways.</p> <p>Updated position (Deadline 1): Response is not relevant.</p>	<p>The population exceeding SOAEL for each fleet are provided as the upper and lower end of each range provided in each cell of Table 14.9.7.</p> <p>Where properties experiencing significant increases are discussed and identified in paragraphs 14.9.102 to 14.9.105 these are for the slower transition case, i.e. the worst case. The day and night SOAEL contours for the two fleets are within 50-100m of each other in the majority of the populated areas, that are all rural with low population densities, so the equivalent populations to be identified for the Central Case fleet would be very similar but slightly lower in number.</p>	Paragraphs 14.9.102 to 14.9.105 and Table 14.9.7 of ES Chapter 14 Noise and Vibration [APP-039]	Response is not relevant – not agreed

2.17. Planning and Policy

2.17.1 Table 2.17 sets out the position of both parties in relation to planning and policy matters.

Table 2.17 Statement of Common Ground – Planning and Policy Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.17.1.1	Exclusion of Local Plan Policies and lack of consideration of their requirements.	Lack of reference or acknowledgement of the adopted policies and relevant supplementary guidance that should be considered as part of the DCO. Updated position (Deadline 1): CBC looks forward to receipt of this additional information. GAL should also address the emerging Crawley Borough Local Plan 2024-2040 which is now at Main Modifications Consultation stage. Therefore, many of the policies not subject to Main Modifications now have 'significant weight'.	Relevant local policies are set out within the DCO Application, namely within the legislation and policy sections of the topic-specific ES Chapters 7 to 20 and Gatwick Airport-specific local plan policies and supplementary planning documents and guidance in Section 6.6 of the Planning Statement. To assist CBC, GAL will prepare a local policy assessment table drawing together the relevant local policies and supplementary planning documents and guidance assessed against the Project proposals.	Planning Statement [APP-245]	Under discussion
2.17.1.2	Airports National Policy relevance to the DCO determination	Whether there is any legal precedent for the statement that it is "appropriate to use the policy framework of the [Airports National Policy Statement (ANPS) as the primary framework against which the project as whole should be tested" (para 1.5.19). Updated position (Deadline 1): Awaiting legal advice.	The Airport National Policy Statement (para 1.41) itself confirms that "the Secretary of State considers that the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application [not comprising an application for the Heathrow Northwest Runway], particularly where it relates to London or the South East of England."	n/a	Under discussion
2.17.1.3	Planning History	Incomplete, inaccurate and misleading. No details on the current controls and conditions imposed by existing planning permissions and no evidence to justify the baseline position being relied upon. Updated position (Deadline 1): CBC looks forward to receipt of this additional information and trust this will address the comments in full.	In response to CBC's comment, GAL will undertake a review of Appendix A of the Planning Statement containing the planning history summary.	Planning Statement Appendix A [APP-246]	Under discussion

2.18. Project Elements and Approach to Mitigation

2.18.1 Table 2.18 sets out the position of both parties in relation to project elements and approach to mitigation matters.

Table 2.18 Statement of Common Ground – Project Elements and Approach to Mitigation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.18.1.1	Clarification of airfield boundaries and what the various plans show.	<p>Project Description, Existing Site and Operation - Lack of clarity about current airport boundary / operational airport boundary and extent of land needed for and controlled by the DCO. The boundaries need to be understood on drawings and in context of drafting of DCO to be clear on airport limits, any permitted development provisions and to ensure drafting of the DCO and requirements are effective and enforceable.</p> <p>Updated position (Deadline 1): The plans referred to (APP-004) do not form part of the DCO for approval and CBC does not agree these boundaries. In addition, there appears to be third party land within the DCO project boundary and the issue of operational land and extent to which PD rights could be applied need to be established. This needs further discussion.</p>	<p>The airport boundary is defined on the Airport Boundary Plan, contained in Appendix 1 of the Project Glossary. The airport is divided into two, being landside and airside areas, shown in Appendix 2 of the Project Glossary.</p> <p>The extent of land required for the Project is defined by the Order Limits shown on the full suite of the DCO Application's plans in Book 4.</p>	<p>Project Glossary [APP-004]</p>	Not Agreed
2.18.1.2	Lack of design quality controls and targets	<p>Design and Access Statement - Document has been prepared without any design ambition or commitment to measurable standards.</p> <p>Updated position (Deadline 1): Feedback will be detailed in the LIR which CBC will be happy to discuss with GAL. Further information will be needed to address this point.</p>	<p>We would welcome CBC's feedback on which specific policies or design standards in the Design and Access Statement (DAS) it does not consider to be clear or without a measurable standard. It should be noted that the information contained in the DAS is indicative, as explained in paragraph 1.1.3 of the DAS Volume 1.</p> <p>This is different to the design principles, contained in Appendix A1 of the Design and Access Statement: Volume 5, which are proposed to be legally secured by the draft DCO (e.g. Requirements 4, 5 and 10).</p>	<p>Appendix A1 of the Design and Access Statement: Volume 5 [APP-257]</p> <p>Design and Access Statement: Volume 1 [APP-253]</p> <p>Draft DCO (Doc Ref. 2.1)</p>	Under discussion
2.18.1.3	Indicative status of majority of DAS and lack of 'design fix'.	<p>Design and Access Statement - Appendix A1 is an inadequate Control document of insufficient detail.</p> <p>Updated position (Deadline 1): Feedback will be detailed in the LIR which CBC will be happy to discuss with GAL. Further information will be needed to address this point.</p>	<p>The description of the Project elements is described in various documents, in particular in ES Chapter 5: Project Description and the Design and Access Statement. For some elements of the Project, provided that the DCO is granted, there would be details and elements of the Project that would still require subsequent approvals. Where subsequent approvals are required, a series of control documents are contained in the DCO Application to direct the subsequent approvals. The draft DCO sets out the subsequent approvals that are required and the relevant approving authority.</p> <p>As explained in Item 19.2 above, the Design and Access Statement is indicative. This is different to the design principles, contained in Appendix A1 of the Design and Access Statement:</p>	<p>ES Chapter 5: Project Description (Doc Ref. 5.1)</p> <p>Design and Access Statement Volume 1 [APP-253]</p> <p>Design and Access Statement Volume 2 [APP-254]</p> <p>Design and Access Statement Volume 3 [APP-255]</p>	Under discussion

			<p>Volume 5, which are proposed to be legally secured by the draft DCO (e.g. Requirements 4, 5 and 10).</p> <p>On a project of this scale and complexity, it is not always possible to include the necessary detail for every component of the Project as part of the DCO Application. This approach is common across Nationally Significant Infrastructure Projects that are consented by DCOs.</p>	<p>Design and Access Statement Volume 4 [APP-256]</p> <p>Design and Access Statement Volume 5 [APP-257]</p> <p>Draft DCO (Doc Ref. 2.1)</p>	
2.18.1.4	Lack of detail in document including lack of site context analysis, site constraints and opportunities (also lacking from ES Project Description)	<p>Design and Access Statement - Some aspects of development excluded from D and A document, also a general lack of contextual analysis including site opportunities and constraints. Insufficient information on design and visual impacts. This is of particular concern in environmentally sensitive locations.</p> <p>Updated position (Deadline 1): Feedback will be detailed in the LIR which CBC will be happy to discuss with GAL. Further information will be needed to address this point.</p>	<p>As noted in Item 19.2, the Applicant welcomes CBC's specific feedback on the Design and Access Statement and will then undertake a review of the document in response to CBC's comments.</p> <p>It is not considered appropriate that this analysis is contained in ES Chapter 5: Project Description given that that's chapter's purpose is to explain the Project proposals.</p> <p>The environmental impacts of the Project have been assessed, as demonstrated through the Environmental Statement, with mitigation proposed as appropriate. For instance in respect of visual amenity, the assessment of the Project's landscape, townscape and visual effect is contained in ES Chapter 8: Landscape, Townscape and Visual Resources.</p>	<p>Design and Access Statement Volume 1 [APP-253]</p> <p>Design and Access Statement Volume 2 [APP-254]</p> <p>Design and Access Statement Volume 3 [APP-255]</p> <p>Design and Access Statement Volume 4 [APP-256]</p> <p>Design and Access Statement Volume 5 [APP-257]</p> <p>ES Chapter 5: Project Description (Doc Ref. 5.1)</p> <p>Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</p>	Under discussion
2.18.1.5	Inconsistencies in documents within DAS and in relation to other supporting documents.	<p>Design and Access Statement - Conflicting descriptions and cross-referencing lead to uncertainty over what is proposed and which details should take precedent.</p> <p>Updated position (Deadline 1): This point cannot be addressed at this stage.</p>	The Applicant is undertaking a review of the project description's terminology against the Environmental Statement and draft Development Consent Order in response to the Planning Inspectorate's (PINS) Section 51 Advice. Updated documents will be submitted no later than 10 working days before the Preliminary Meeting, as per PINS request.	Section 51 Advice [PD-003]	Under discussion

<p>2.18.1.6</p>	<p>Lack of defined parameters for some development and lack of on parameter plans and within Schedule 12 Control documents.</p>	<p>Design and Access Statement - All development should have defined parameters for all elements including soil deposition and temporary storage areas.</p> <p>Updated position (Deadline 1): Feedback will be detailed in the LIR which CBC will be happy to discuss with GAL. Further information will be needed to address this point.</p>	<p>Elements of the Project which do not have defined parameter areas are defined through the draft DCO (Schedule 1), within the Order Limits and through the accompanying control documents, such as the Design Principles in Appendix A1 of the Design and Access Statement and the Outline Landscape and Ecology Management Plan.</p>	<p>Appendix A1 of the Design and Access Statement: Volume 5 [APP-257]</p> <p>Draft DCO (Doc Ref. 2.1)</p> <p>ES Outline Landscape and Ecology Management Plan Part 1 [APP-113]</p> <p>ES Outline Landscape and Ecology Management Plan Part 2 [APP-114]</p> <p>ES Outline Landscape and Ecology Management Plan Part 3 [APP-115]</p> <p>ES Outline Landscape and Ecology Management Plan Part 4 [APP-116]</p>	<p>Under discussion</p>
<p>2.18.1.7</p>	<p>Lack of detail on construction phasing</p>	<p>Design and Access Statement - Need for further understanding on sequencing and co-dependencies between the project elements to ensure appropriate phasing and control of the development and ensure mitigations in place.</p> <p>Updated position (Deadline 1): CBC would wish to engage to gain further understanding of construction phasing,</p>	<p>Further detail on the anticipated construction timing and sequencing is contained in Section 5.3 of ES Chapter 5: Project Description and ES Appendix 5.3.3: Indicative Construction Sequencing and accompanied by the Buildability Reports. The indicative construction sequencing shows the project works on a yearly basis, with supporting descriptions in the Project Description.</p>	<p>ES Chapter 5: Project Description (Doc Ref. 5.1)</p> <p>ES Appendix 5.3.3: Indicative Construction Sequencing [APP-088]</p> <p>ES Appendix 5.3.1 Buildability Report Part [APP-079]</p> <p>ES Appendix 5.3.1 Buildability Report Part B Part 1 [APP-080]</p>	<p>Under discussion</p>

				ES Appendix 5.3.1 Buildability Report Part B Part 2 [APP-081]	
2.18.1.8	Safeguarding of existing landscaping and protection of visual amenities	Design and Access Statement -Lack of detail on landscape protection measures and zonal approach proposed in document is too vague giving inadequate control to safeguard impacts.	This item is responded to in the landscape-related table. Please refer to Item 9.1 in Table 9: Landscape.	n/a	Merge with above
2.18.1.9	Lack of clarity on how Port Health functions will be scaled in line with passenger growth	Currently Port Health has insufficient space. Not clear where new space will be provided.	ES Chapter 18: Health and Wellbeing confirms at paragraphs 18.8.579 to 18.8.582 that requirements for additional port health space being provide by GAL would be agreed with relevant parties through post determination discussions as part of business-as-usual reviews and planning of port heath activities at the Airport in line with statutory obligations.	ES Chapter 18: Health and Wellbeing [APP-043]	Agreed
2.18.1.10	CAA No Impediments	When GAL expects the Civil Aviation Authority to confirm there are no obvious safety related impediments. Updated position (Deadline 1): CBC await receipt of this information.	GAL expects CAA's letter of no impediment to be submitted early in the Examination stage. As confirmed in the Planning Statement (para 1.3.3), GAL is confident that there are no safety-related impediments why the Project should not progress and that this will be confirmed through the CAA's letter.	Planning Statement [APP-245]	Under discussion
2.18.1.11	Northern Runway operation controls	How the runway operation changes mentioned in paragraphs 1.3.7 and 1.3.8 will be secured and appropriately controlled. Updated position (Deadline 1): Awaiting legal advice.	Airspace within the UK is regulated by the Civil Aviation Authority (CAA) and managed by NATS En Route, which is a subdivision within the National Air Traffic Services. An explanation of the relationship between the DCO Project and airspace regulations was set out in paragraphs 3.3.10 to 3.3.13 of the Autumn 2021 Consultation, contained in Consultation Report Appendices, Part B, Volume 2.	Consultation Report Appendices, Part B, Volume 2 [APP-225]	Under discussion
2.18.1.12	Site Waste Management Plans	Why the dDCO does not make provision about securing that Site Waste Management Plans following the template in the Construction Resources and Waste Management Plan. Updated position (Deadline 1): Noted. WSCC, as Waste Authority to confirm	The Construction Resources and Waste Management Plan (CRWMP) is an Annex to the Code of Construction Practice to be secured as a certified document and under Requirement 7 of the draft DCO. Paragraph 1.4.1 of the CRWMP explains that it will be implemented through the preparation of site waste management plans, with a template contained in Appendix A, and which is also referenced under the Code of Construction Practice.	ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3) ES Appendix 5.3.2 Code of Construction Practice Annex 5 – Construction Resources and Waste Management Plan [APP-087] Draft DCO (Doc Ref. 2.1)	Under discussion
2.18.1.13	Geology and Site Conditions	Refers to “existing legislative regimes” for spillages and storage facilities. Aside from the Control of Pollution (Oil Storage) (England) Regulations, are any other regimes relevant	Legislation in place to protect existing geology and ground conditions is set out in Section 10.2 of ES Chapter 10: Geology and Ground Conditions.	ES Chapter 10: Geology and Ground Conditions [APP-035]	Agreed

2.18.1.14	Concern regarding the assessment work undertaken	<p>Whilst the Council and the other host and neighbouring authorities raised the need on the part of GAL for substantive engagement on the scope and approach taken on a range of technical assessment work during the December 2021 Preliminary Environmental Information Report (PEIR) and July 2022 second pre-submission consultation, this engagement did not happen to the extent expected. Having had the opportunity to analyse GAL's DCO submission documents, the Council has significant concerns regarding extensive elements of the assessment work undertaken and included within the DCO submission.</p> <p>Updated position (Deadline 1): This will be detailed in the LIR.</p>	Please may CBC clarify if it has any additional queries or concerns with the Project's assessment work that is not covered by its Relevant Representations (RRs) and Principal Areas of Disagreement Summary Statements (PADSS) (and therefore these Issues Tables).	n/a	Under discussion
2.18.1.15	Mitigation	The Council considers that the scope and scale of mitigations proposed are not sufficient to overcome the expected adverse impacts arising from the proposals.	We would welcome CBC's feedback on which specific mitigation it does not consider to be sufficient if this is not already set out in its RRs and PADSS (and therefore responded to elsewhere in these Issues Tables).	n/a	Under discussion
2.18.1.16	Control measures	<p>The control mechanisms set out in the draft DCO (dDCO) and the control documents are not sufficiently detailed, effective or enforceable, with much being left to subsequent approvals/discharge of requirements for which there has been no discussion or engagement about the resources, timings and costs involved with addressing these matters.</p> <p>Updated position (Deadline 1): This point requires further discussion. It relates to the content of the proposed documents and plans which currently form the DCO and the current lack of detail in this information which would steer the discharge of requirements. It is understood that some details are not fully worked up but the issue here is that a lot of information is not worked up and needs to be addressed through the DCO process to ensure the quality and phasing of the development is controlled. Further details to follow in the LIR.</p> <p>CBC welcome further discussion on Schedule 11.</p>	<p>We would welcome CBC's feedback on which control documents it considers to be not sufficiently detailed, effective or enforceable, if this is not already set out in its RRs and PADSS (and therefore responded to elsewhere in these Issues Tables).</p> <p>On a project of this scale and complexity, it is not always possible to include the necessary detail for every component of the Project as part of the DCO Application. This approach is common across NSIPs that are consented by DCOs. Where subsequent approvals are required, these are set out in the draft DCO together with the relevant approving authority.</p> <p>Schedule 11 of the draft DCO sets out the process, timings and fees associated to subsequent approvals. A placeholder is within Schedule 11 to confirm the payment of fees to be made to the discharging authority, to be subject to further engagement with the LAs.</p>	Draft DCO (Doc Ref. 2.1)	Under discussion
2.18.1.17	Benefits and Community Compensation	<p>There is also concern that there is a lack of certainty regarding the scale and timing of the benefits and community compensation arising from the proposals and insufficient confidence in how they will be secured, operated and enforced.</p> <p>Updated position (Deadline 1): The draft S106 Agreement has been received and is being reviewed. Further feedback to follow on this point</p>	GAL will issue a draft of the Section 106 Agreement in connection with the NRP to the local authorities, which includes an obligation for a Community Fund. GAL looks forward to receiving initial feedback on the first draft and continuing engagement with the parties to ensure a final, signed version has been submitted by the close of the examination.	n/a	Under discussion
2.18.1.18	General concern regarding approach to assessment and mitigation.	Significant concerns regarding GAL's approach to the assessment and evaluation of the environmental impacts including defective baseline assessments and furthermore, significant concerns about the scale of	Please may CBC clarify if it has any additional queries or concerns with the Project's assessment work that is not covered by its RRs and PADSS (and therefore these Issues Tables).	n/a	Under discussion

		those impacts and the inadequacy of mitigation - see detailed topic concerns (paragraphs 5 to 21). Updated position (Deadline 1): The RR, the forthcoming LIR and Written Rep will provide further detail.			
2.18.1.19	Local impact mitigation	Concerns regarding the lack of clarity of the approach taken to the identification, management and enforcement of local impact mitigation and to the funding of that mitigation where applicable, given the longevity of the proposals and the potential for circumstances and potential impacts to change over time. Updated position (Deadline 1): The RR, the forthcoming LIR and Written Rep will provide further detail.	We would welcome further detail from CBC on which mitigation it requires clarity, if not covered elsewhere in its RRs and PADSS (and therefore covered elsewhere in these Issues Tables).	n/a	Under discussion
2.18.1.20	Scope and scale of mitigation	The limited scope and scale of the proposals environmental mitigations and community compensation, which are nowhere near commensurate with the likely adverse impacts arising from the proposed development in accordance with the CIL tests and national aviation policy. Updated position (Deadline 1): The RR, the forthcoming LIR and Written Rep will provide further detail.	As this is an overarching comment on the DCO submission, please may CBC clarify if it has any additional queries or concerns with the Project's assessment work that is not covered by its RRs and PADSS (and therefore not covered elsewhere in these Issues Tables).	n/a	Suggest this issue is integrated with the similar issue above (19.18) Agree merge
2.18.1.21	Control mechanisms	The lack of effective control mechanisms to ensure that the Airport's growth is contained within expected agreed environmental parameters in the short and longer terms. Updated position (Deadline 1): CBC does not consider GAL is providing effective control mechanisms to ensure the airport's growth is contained with expected environmental parameters	The extents and parameters of the Project would be secured through the draft DCO, namely Schedule 1 in defined the authorised development and Schedule 12 setting out the certified documents, including the series of application drawings submitted for approval. The Mitigation Route Map sets out how the Project's mitigation measures would be legally secured.	Draft DCO (Doc Ref. 2.1) Book 4: 4.5 Works Plans [AS-017] Book 4: 4.7 Parameter Plans [APP-019] ES Appendix 5.2.3 Mitigation Route Map [APP-078]	Under discussion
2.18.1.22	Wider opportunities for improving links and connectivity	Lack of recognition of the wider socio-economic and environmental context around the Airport and the opportunities for improving links and connectivity beyond the Airport and its immediate environs including active travel, recreation, ecological and landscape connections. Updated position (Deadline 1): The RR, the forthcoming LIR and Written Rep will provide further detail.	As this an overarching comment on the DCO submission, please may CBC clarify if it has any additional queries or concerns on the contextual recognition of the Project that is not covered by its RRs and PADSS (and therefore not covered elsewhere in these Issues Tables).	n/a	Under discussion
2.18.1.23	Section 106 Agreement	When further information regarding the proposed section 106 agreement will come forward and when negotiations will begin in earnest. Updated position (Deadline 1): CBC received version 1 of this draft document on 07/02/24.	GAL will issue a draft of the Section 106 Agreement in connection with the NRP to the local authorities. GAL looks forward to receiving initial feedback on the first draft and continuing engagement with the parties to ensure a final, signed version has been submitted by the close of the examination.	n/a	Under discussion

2.18.1.24	Securing the Flood Resilience Statement	How the Flood Resilience Statement will be secured (paragraph 5.5.8 and Table 5.2). Updated position (Deadline 1): CBC would welcome further discussion on this point. Suggest this item is moved to the 'Water Environment ' Section	GAL will consider how best to secure the Flood Resilience Statement and confirm in due course.	n/a	Under discussion
2.18.1.25	Mitigation Route Map	Whether an updated Mitigation Route Map will be prepared (stating, for example, which parts of the dDCO are relevant). Updated position (Deadline 1): CBC thank GAL for clarification on the future updates to this document.	The Mitigation Route Map will be updated during the course of the DCO Examination to reflect any changes / updates made through the process. The next iteration (and any subsequent updates) will specify the relevant schedule/requirement of the draft DCO, as requested by CBC.	Mitigation Route Map [APP-078]	Under discussion
2.18.1.26	Highways Improvements	Why highway improvements will not be in place and open to the public until after the northern runway comes into commercial use (paragraph 7.2.9). Updated position (Deadline 1): This will need further discussion with the Highways Authorities and local authorities.	An explanation of the timing of the surface access improvement works is contained further in the Planning Statement, within Section 8.4. Further detail is also contained in ES Chapter 12: Traffic and Transport and the Transport Assessment, underpinned by the traffic modelling.	Planning Statement [APP-245] ES Chapter 12: Traffic and Transport [APP-037] Transport Assessment [APP-258]	Under discussion
2.18.1.27	Flood Risk Mitigation	Regarding the proposed flood risk mitigation, it is not clear how the timing of the River Mole works (Work No.39) and Car Park Y attenuation tank (Work No. 30(a)) will be secured; similarly, it is not clear where the culverts and syphons are secured. Updated position (Deadline 1): Noted and further information regarding how the timing of river Moles, the car park Y attenuation tank will be secured and the position of culverts and syphons within the flood mitigation works are awaited from GAL	The cited works are anticipated to take place early in the construction timetable – see Section 5.3 of ES Chapter 5: Project Description and ES Appendix 5.3.3: Indicative Construction Sequencing. GAL will consider further whether it is appropriate to secure the timing of their delivery. Culverts and syphons are included in the design principles in Appendix A1 of the Design and Access Statement (Volume 5) and their delivery is therefore secured in the draft DCO by Requirements 4 and 5, which require detailed designs to be approved by the relevant planning or highway authority prior to commencement. The detailed designs must be in accordance with the design principles.	ES Chapter 5: Project Description (Doc Ref. 5.1) ES Appendix 5.3.3: Indicative Construction Sequencing [APP-088] Appendix A1 of the Design and Access Statement: Volume 5 [APP-257] Draft DCO (Doc Ref. 2.1)	Under discussion
2.18.1.28	Design and Access Statement	It is inconsistent in places with confusion over some definitions, contradicting descriptions, inconsistencies on some of the figures and confusing cross referencing.	Please refer to our response under Item 19.5 for details.	n/a	Under discussion
2.18.1.29	Design and Access Statement	It is not considered comprehensive as, for example, some development is excluded; there is a general lack of detail for character zone analysis; lack of detail on design and visual impact of some works; lack of analysis of	Please refer to our response under Item 19.4 for details.	n/a	Under discussion

		the site context, opportunities and constraints and the lack of reference to the Council's Local Plan and Supplementary Planning Documents.			
2.18.1.30	Design and Access Statement	It gives insufficient design control for the scheme works. The wording is vague and non-committal and provides no aspirational design or sustainability standards. There is no certainty that the development would be compliant with the Council's Local Plan standards which the local design and sustainability principles should adhere to.	Please refer to our response under Items 19.2 and 19.3 for details.	n/a	Under discussion
2.18.1.31	Design and Access Statement	Under section 7, it is of concern that some elements of the project including earth works, landscaping and public realm do not have defined parameters. Figure 52 shows key development without defined parameter drawings including Pentagon Field. The Council questions how the DCO is supposed to control these works and ensure acceptable mitigation and design quality with so little information. Updated position (Deadline 1): The response does not address this point.. the description of works for Pentagon Field does not include land raising.	Please refer to our response under Item 19.6 for details.	n/a	Not Agreed
2.18.1.32	Design and Access Statement	Under section 9, the indicative phasing lacks detail and there is a need for further understanding and explanation of the sequencing and codependencies of the various elements of the project in order to ensure appropriate phasing and control of the development. There is no comprehensive commentary to explain the phasing plans. The Council is also concerned about the proposed sequencing and delivery of various elements of the project. Updated position (Deadline 1): CBC would wish to engage to gain further understanding of construction phasing.	Please refer to our response under Item 19.7 for details.	n/a	Under discussion (Merge with 19.7)
2.18.1.33	Project Description	The brevity and lack of description accompanying such a substantial site and project. There are no references to footpaths, recreational routes or how the Airport has evolved within its surroundings. The context of the site is absent from the analysis along with any description of the site constraints and opportunities. The lack of context and understanding of the Airport in the wider landscape and environmental constraints is also apparent in the DAS and this raises concerns about how the site has been assessed and the regard (if any) had to the impacts of the development on the wider surroundings. Updated position (Deadline 1): The purpose of ES Ch 5 is noted. The DAS vol 1 does address context but this is not followed into the later volumes. Please see further comments in LIR.	The purpose of ES Chapter 5: Project Description is to explain the Project proposals and does not seek to analysis the existing site or its surrounds. The chapter does however provide a level of explanation of existing uses where helpful to provide context to the Project's description. The Design and Access Statement (Volume 1) describes and analyses the site context, including surrounding public rights of way and recreational routes.	ES Chapter 5: Project Description (Doc Ref. 5.1) Design and Access Statement (Volume 1) [APP-253]	Under discussion
2.18.1.34	Project Description	The future baseline figures as set out in the chapter are not agreed.	Further clarity is requested from CBC on what element of the future baseline is not agreed. As explained at earlier TWGs and in responses to previous Issues Trackers, the future baseline comprises developments which are either under construction,	n/a	Not Agreed

		<p>Updated position (Deadline 1): This relates to car parking - Please see LIR for information. Robotic Car Parking concerns are covered in greater detail at Row 5.10 of this SoCG.</p> <p>It has not been evidenced to the LPA that the Hilton car park planning application has been lawfully implemented, and therefore it cannot necessarily be relied upon in the baseline.</p>	subject to planning permission or are reasonably expected to gain planning permission.		
2.18.1.35	Project Description	<p>A general lack of detail, ambition and concerns about the way in which the development can appropriately be delivered in terms of phasing, design quality, mitigation and ensuring future safeguards (controls).</p> <p>Updated position (Deadline 1): Feedback will be detailed in the LIR which CBC will be happy to discuss with GAL. Further information will be needed to address this point.</p>	Please refer to our response under Items 19.3 and 19.6 for details.	n/a	Under discussion
2.18.1.36	Project Description	<p>Inconsistencies in descriptions between the works and the way they are described with some elements having parameters and others not.</p> <p>Updated position (Deadline 1): This cannot be addressed at this stage.</p>	Please refer to our response under Item 19.5 for details.	n/a	Under discussion
2.18.1.37	Project Description	<p>Lack of detail in particular for multi element works or phased works.</p> <p>Updated position (Deadline 1): This relates to concerns about presentation and explanation of the different elements, and phases of the numerous works in the Project. CBC requests greater clarity.</p>	Further clarity is requested from CBC on the specifics of this response. The Project works are described in various application documents, along with the anticipated construction timing and sequencing. For instance, ES Chapter 5: Project Description, ES Appendix 5.3.3: Indicative Construction Sequencing, Buildability Reports and the Design and Access Statement (Volumes 1 to 5).	<p>ES Chapter 5: Project Description (Doc Ref. 5.1)</p> <p>ES Appendix 5.3.3: Indicative Construction Sequencing [APP-088]</p> <p>ES Appendix 5.3.1 Buildability Report Part A [APP-079]</p> <p>ES Appendix 5.3.1 Buildability Report Part B Part 1 [APP-080]</p> <p>ES Appendix 5.3.1 Buildability Report Part B Part 2 [APP-081]</p> <p>Design and Access Statement Volume 1 [APP-253]</p>	Under discussion

				Design and Access Statement Volume 2 [APP-254] Design and Access Statement Volume 3 [APP-255] Design and Access Statement Volume 4 [APP-256] Design and Access Statement Volume 5 [APP-257]	
2.18.1.38	Project Description	<p>While it is accepted that some details may not be known, it is disappointing there is so little recognition or understanding of the site context, there are no details or analysis of the site areas as they exist today, or of the physical characteristics or constraints of the area. The council has no comfort that the development would respond positively to the setting of the area and would not result in visual or environmental harm to the character of the area.</p> <p>Updated position (Deadline 1): This matter is addressed in the LIR</p>	<p>The purpose of ES Chapter 5: Project Description is to explain the Project proposals and does not seek to analysis the existing site or its surrounds. The chapter does however provide a level of explanation of existing uses where helpful to provide context to the Project's description.</p> <p>The Design and Access Statement (Volume 1) describes and analyses the site context. The Applicant considers that the Statement has been prepared to an acceptable standard and covers the project in a comprehensive level of detail. Naturally, documents need to be read in conjunction with others, as a package, to ensure each document is of an appropriate scale and focus. Therefore, the DAS should be read in conjunction with other documents, in the case for example the ES Chapter 8: Landscape, Townscape and Visual Resources.</p>	ES Chapter 5: Project Description (Doc Ref. 5.1) Design and Access Statement (Volume 1) [APP-253] ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]	Under discussion
2.18.1.39	Project Description	<p>The Council is concerned that there appears to be extensive tree loss within the Borough as a result of this development, in particular in connection with the highway works but also along potentially visually sensitive locations along the southern boundary and land east of the railway. This is not acknowledged in the project description; neither is the need for mitigation.</p> <p>Updated position (Deadline 1): Please see LIR.</p>	<p>This item is responded to in the landscape-related table. Please refer to Row 8.86 of in Table 8: Ecology.</p> <p>Detailed arboricultural surveys have been undertaken with respect to the highways works along the A23 with the results presented within the oLEMP. These data have been used to inform the design of the highway to protect areas of high arboricultural value, where possible (near to South Terminal roundabout, for example).</p> <p>Tree loss elsewhere within the Project is largely limited to planting between carpark areas. These locations are currently being surveyed with further arboricultural impact assessments to be provided.</p>	ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 1 [APP-113] ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 2 [APP-114] ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 3 [APP-115]	Under discussion

				<p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Part 4 [APP-116] ES Appendix 8.9.1 Summary of Effects at Representative Viewpoints [APP-117]</p>	
--	--	--	--	--	--

2.19. Socio-Economics and Economics

2.19.1 Table 2.19 sets out the position of both parties in relation to socio-economics and economics matters.

Table 2.19 Statement of Common Ground – Socio-Economics and Economics Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
2.19.1.1	Assessment of impacts on property prices	<p>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.</p> <p>Updated position (Deadline 1): PINs specifically advised that the applicant should undertake an assessment of impacts on property prices. Applicant advised at a TWG meeting that they would be undertaking this assessment. Applicant has acknowledged in the Environmental Statement there will be an adverse impact on property prices.</p>	<p>GAL has not included a specific assessment of effects on property prices in the ES for the reasons set out in Table 17.4.2 of ES Chapter 17 Socio-Economic.</p> <p>Impacts on residential property values have not been included in scoping for other comparable DCO projects (e.g. Heathrow, Manston, Luton).</p>	Table 17.4.2 of ES Chapter 17 Socio-Economic [APP-042].	Not Agreed
2.19.1.2	Clarification on use of pre-Covid data	<p>Paragraph 17.4.14 states that 2019 data was primarily used given concerns with the Covid pandemic potentially affecting baseline data. However, this is a confusing message given some of the data sources used are post Covid and it is not clear why the Applicant has applied this approach.</p> <p>Updated position (Deadline 1): The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p>	The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions are expected to rebound to pre-pandemic levels before the Project’s commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability.	n/a	Not Agreed
2.19.1.3	Use of up-to-date information sources	<p>Paragraph 17.5.1 states that data from the 2021 Census is currently being released and this has been used where available at the relevant spatial scale. On this basis, the baseline assessment presented in section 17.6 comprises the most up-to-date position at the time of writing.</p> <p>Updated position (Deadline 1): The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p>	The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions are expected to rebound to pre-pandemic levels before the Project’s commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability.	n/a	Not Agreed
2.19.1.4	Consideration of worst-case scenario for employment benefit	<p>Paragraph 17.5.5 states that the construction assessment presented in Section 17.9 focuses on the project’s potential maximum effects. Whilst it is important to consider the maximum scale of impacts in terms of potential implications on local areas, it is also important to present a worst-case scenario in terms of employment benefit.</p>	Lower levels of construction workforce numbers are assessed within the ES e.g. at para 17.9.81.	ES Chapter 17 Socio-Economics [APP-042]	Not Agreed

		Updated position (Deadline 1): Paragraph 17.9.81 refers to peak construction workforce. Original response still stands.			
2.19.1.5	Use of outdated data sources	<p>Census 2011 has been used for dwelling vacancy and economic activity. Further, in the description of employment-led scenarios, paragraph 3.1.9 notes that modelling assumes that commuting, unemployment and economic activity are fixed over the forecast period based on inputted assumptions, a number of which are significantly out of date including vacancy and economic activity rates from the 2011 Census.</p> <p>Updated position (Deadline 1): The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p>	<p>Please see the response provided at Row 3.6 of this table. A range of data sources have been considered in the baseline depending on the specific indicators being considered and the availability of data at different geographical scales. The latest data has been used where available, with historic data points also included to help assess trends over time. The ES and Economic Impact Assessment use consistent impact areas where appropriate.</p>	<p>ES Chapter 17 Socio-Economics [APP-042] Section 17.5.</p>	Not Agreed
2.19.1.6	Distance travelled to work data	<p>Paragraph 2.1.6 explains that the study draws on data provided by the Construction Industry Training Board (CITB) in terms of average distance workers travel to sites for each region of the UK. The application of a regional estimate to capture numbers of home-based workers can be problematic given the considerable differences that exist within local geographies.</p> <p>Updated position (Deadline 1): The approach does not appear to take account of variations within local geographies. Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>	<p>The assessment uses a more conservative assumption that 20% of workers at peak will be non-home based which is significantly higher than the regional or national averages.</p>	<p>Section 17.6 of ES Chapter 17: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Tables [APP-197].</p> <p>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] Section 6.1</p>	Not Agreed
2.19.1.7	Use of out of date data sources	<p>Where Census 2011 data is being relied upon for analysis, there needs to be an assumption/limitation added to the analysis given the source is significantly out of date which could affect the accuracy of the GGM. This has the potential to affect the accuracy of the GGM in terms of estimating numbers of home-based (HB) workers and non-home based (NHB) workers.</p> <p>Updated position (Deadline 1): The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p>	<p>Census 2011 data was all that was available at the time of the assessment.</p> <p>Changes between the 2011 and 2021 census would only matter where growth was so significantly higher in one area compared to another that they changed the “gravity” in the model. Even then, given the small numbers involved they are unlikely to change the conclusions of the assessment.</p> <p>Updating to take account of 2021 data would have no effect on the estimate of the number of HB and NHB workers.</p>	<p>Paragraph 7.4.11 of ES Chapter 17 Socio-Economic [APP-042] and ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].</p>	Not Agreed
2.19.1.8	Out of date data sources	<p>Several Baseline Data Tables are out of date and don't use the most recent data sources available at the time. This includes education data on shortfall/surplus which needs to be tested with relevant local education authorities.</p>	<p>There is no effect on demand for school places so updating the baseline will make no difference to the assessment of effects.</p>	<p>ES Chapter 17: Socio-Economics [APP-042]</p>	Agreed

2.19.1.9	Basis for distribution assessment of direct impacts	<p>Paraph 5.3.9 states that the impact estimates on the basis of residency distribution of direct impacts are presented. GAL has provided pass holder address information to inform this. It is not clear when this information was obtained therefore the local authorities cannot be certain the information used is up to date.</p> <p>Updated position (Deadline 1): Does the updated staff survey provide more up-to-date information that would be relevant here?</p>	2019 as this was the last full year prior to Covid.	n/a	Under discussion
2.19.1.10	Date of information	<p>The assessment of housing and population relies on older data and should be using up-to-date information given it will impact on labour supply/housing conclusions. The assessment also makes optimistic projections on housing and doesn't appear to fully consider existing constraints.</p> <p>Updated position (Deadline 1): The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p> <p>The Applicant hasn't responded on question related to consideration of existing constraints.</p>	The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions are expected to rebound to pre-pandemic levels before the Project's commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability.	n/a	Not Agreed
Assessment Methodology					
2.19.2.1	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area.</p> <p>The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</p> <p>Updated position (Deadline 1): Awaiting Consultant input following TWG 15 Feb</p>	<p>Catalytic impacts refers to the economic activity of firms that are not in the indirect or induced footprint of the airport choosing to locate near the airport because of the connectivity that it offers. The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic.</p> <p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>We are arranging a technical working group meeting to address these issues in early January 2024.</p>	<p>ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].</p> <p>Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].</p>	Under discussion

2.19.2.2	Confirmation on projects which informed methodological approach.	<p>Paragraph 17.4.2 states that the methodology has been based on accepted industry practice, a review of socio-economic assessments for other relevant projects including other airport or significant infrastructure schemes, and feedback received by PINS and local authorities during the consultation process.</p> <p>Updated position (Deadline 1): The Applicant hasn't provided details of other relevant projects and set out why they are relevant. Whilst the Applicant presented their method and assessment at the TWG sessions, these were not agreed with by the local authorities who provided written feedback on their concerns to the Applicant.</p>	<p>Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023</p>	<p>ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197]</p>	Not Agreed
2.19.2.3	No consideration of effects at a Crawley borough level.	<p>Despite being raised as a gap in the assessment at several Socio-economic Topic Working Group meetings, there is still 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 given they affect both functioning and decision making at the local level.</p> <p>Updated position (Deadline 1): The Applicant has not provided a satisfactory response to the question. An assessment of impacts at local authority level is necessary to understand the implications on the local areas surrounding the Scheme. See LIR for concerns specific to Crawley.</p>	<p>A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. Local authority level outputs are also provided. A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and housing effects, outputs are given at a local authority level within Annexes including for the key scenarios a total specifically for the NWS HMA</p>	<p>Consultation Report Annex A, Tables Autumn 2021, Consultation Issues Tables [APP-219]</p> <p>Consultation Report Annex Summer 2022, Consultation Issues Tables [APP-221]</p> <p>ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13</p> <p>Socio-Economic Effects Figures [APP-052] Figure 17.4.2</p> <p>Appendix 17.6.1 Socio-Economic Data Tables [APP-197]</p> <p>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 1.2.1-6 and Annexes 4, 7 and 8</p>	Not Agreed

2.19.2.4	Magnitude of impacts definition	<p>Paragraph 17.4.25 presents tables defining the scale of magnitude of impacts for construction and operational periods of the project. The use of numbers and percentages to quantify impact can be challenging especially given all study areas are different and can be influenced by a number of different factors. It is not clear how these the ranges were defined to inform the assessment.</p> <p>Updated position (Deadline 1): Applicant has not explained how the ranges have been defined which can lead to question marks around assessment robustness.</p>	<p>As shown in ES Chapter 17 Socio-Economics, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment, however proposed thresholds were presented during Topic Working Groups for comment</p>	<p>ES Chapter 17 Socio-Economics [APP-042] Table 17.4.5-6</p>	Not Agreed
2.19.2.5	Approach to population growth projections	<p>Population projections show a population increase of nearly 15,000 (or nearly 6,000 homes assuming an occupancy ratio of 2.5). This does not provide a realistic assessment of the population growth likely to occur in this area. There is no sense check of deliverability of these projections against development constraints in Crawley and constraints in other areas such as the flightpath and green belt designation.</p> <p>Updated position (Deadline 1): CBC welcomes the acknowledgement of Crawley's constraints on housing development, which include aircraft noise and safeguarding for a potential future southern runway.</p>	<p>As set out in GAL's response to housing comments in the Summer 2022 consultation, the housing trajectories used are based on the most recently available at the time of writing, published position of each local authority. These trajectories give a future baseline (in terms of anticipated levels of housing, population and labour force growth). These outcomes have been compared with the housing demand which would be generated based on economic forecasts (from Cambridge Econometrics) plus the Project, to identify any potential shortfalls. Housing demands associated with the Project are therefore implicit within the analysis. The Assessment of Population and Housing Effects is clear that outputs post-2031 should be treated with some caution as many trajectories published by authorities do not go beyond this date. In particular, acknowledging the supply constraints that are likely to exist in Crawley, the analysis trends forward a lower housing figure than the overall trajectory average for the period beyond Crawley's current trajectory.</p>	<p>Consultation Issues Tables Summer 2022 [APP-221] Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] para 4.3.1-14.</p>	Agreed
2.19.2.6	Application of assessment issues across all scenarios	<p>With regards to the sections on other scenarios: (1) Interim Assessment Year: 2032 (Paragraphs 17.9.80-17.9.119) (2) Design Year: 2038 (Paragraphs 17.9.120-17.9.142) (3) Long Term Forecast: 2047 (Paragraphs 17.9.143-17.9.165) The construction (where applicable) and operational phase assessments have been undertaken in line with the assessment discussed to date. Therefore, all previous comments made on the assessment are relevant here.</p> <p>Updated position (Deadline 1): CBC have advised on a number of concerns related to the initial scenario presented in the chapter. These concerns apply to all other scenarios presented in the chapter.</p>	<p>This issue requires further explanation from CBC.</p>	n/a	Not Agreed
2.19.2.7	Cumulative effects	<p>The conclusion that in the absence of information, it is not possible to provide a cumulative assessment for all construction effects, is simplistic and given the significant concerns raised with the main assessment, a comprehensive cumulative</p>	<p>Paragraph 17.11.7 refers only to construction socio-economic effects, not all construction effects.</p>	<p>ES Chapter 17: Socio-Economics [APP-042]</p>	Under discussion

		<p>assessment should be undertaken to establish if there are potential issues within the study areas. Furthermore, paragraph 17.11.9 states that the construction period of the project will overlap ‘to some degree’ with Tier 1 schemes. The statement ‘to some degree’ is understating the potential labour supply issues. It is clear there will be commonality of skills and trades demanded by the project and other construction projects. The operational cumulative effects (first full year) section is based on projections of future population labour supply, jobs and housing and is unlikely to have a material effect on the conclusions from the initial assessment. A number of queries related to population, labour supply, jobs and housing have been raised which would have an impact on this assessment.</p> <p>Updated position (Deadline 1): The Applicant hasn’t provided a reasonable explanation for not undertaking a cumulative assessment of construction socio-economic effects. This assessment should be undertaken. Construction skills shortages are a recognised constraint in Sussex and therefore the labour force may have to travel from outside the area (i.e. NHB).</p> <p>In terms of operation, the Applicant is not identifying local issues because they haven’t undertaken an assessment of impacts at a local authority level.</p> <p>CBC note the applicant’s feedback on housing supply generally. However, the council considers that the Applicant needs to undertake a more granular assessment in the local area relating to temporary accommodation for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p> <p>The council also wishes to understand any future impact from the permanent workforce on affordable housing need. This is a particular concern for Crawley, as the borough’s affordable housing need is almost as high as its overall housing need of which only 42% can be met within the borough.</p>	<p>Paragraph 17.11.9 is clear that the data shows that labour supply issues are not anticipated.</p> <p>For operational effects potential effect of the cumulative schemes on the future population, jobs, labour supply and housing in combination with the Project is smaller than the demographic projections assessed in detail in the Assessment of Population and Housing Effects.</p> <p>As set out in response to point 3.4, impacts are already assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.</p>	<p>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].</p>	
<p>2.19.2.8</p>	<p>The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local housing needs or requirements at a housing market area or local level (such as market signals,</p>	<p>There needs to be a more granular assessment of housing delivery in the area, in particular of future supply, as well as the unmet affordable housing need to inform the assessment. The Applicant fails to consider the complex reasons affecting housing supply</p> <p>Updated position (Deadline 1): CBC note the applicant’s feedback on housing supply generally. However, the council considers that the Applicant needs to undertake a more granular assessment in the local</p>	<p>A similar comment was made in response to the Autumn 2021 consultation; GAL’s response stated that the Assessment of Population and Housing Effects adopts the same approach as applied in Strategic Housing Market Assessments which are typically prepared for the purposes of plan-making. Following other comments raised on the approach taken to assessing housing effects which were received in the Autumn 2021 and Summer 2022 consultations (and as outlined in GAL’s</p>	<p>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201].</p>	<p>Under discussion</p>

	affordable housing or constraints on housing supply)	<p>area regarding temporary accommodation for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p> <p>The council also wishes to understand any future impact from the permanent workforce on relating to the unmet affordable housing need. This is a particular concern for Crawley, as the borough's affordable housing need is almost as high as its overall housing need of which only 42% can be met within the borough.</p>	<p>responses), a range of analysis has been added to the Assessment of Population and Housing Effects throughout the process, including analysis of potential affordable housing demand (based on a breakdown of jobs by classification), temporary housing demand during construction, additional commentary on housing trajectory points raised (including past delivery trends and potential impacts of water/nutrient neutrality) and additional detailed outputs at a local authority level.</p>		
2.19.2.9	Labour supply constraint	<p>The Gravity Model used to identify the split of construction workers as 80% HB and 20% as NHB does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA. Given these constraints, an assumption of 80% HB construction workers doesn't appear to be very realistic in practice or indeed a worst case approach.</p> <p>Updated position (Deadline 1): Construction skills shortages are a recognised constraint in Sussex and therefore the labour force may have to travel from outside the area (i.e. NHB). The Council is concerned about the demand for temporary accommodation for construction workers should there be a greater proportion of NHB workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>	<p>This is explained in the Gatwick Construction Workforce Distribution Note. The average proportion of non-home based workers in England is 5% and in the South East is 7%. A NHB share of 20% therefore is conservative.</p> <p>There is no evidence of a shortage of construction workers such that the project would be unable to recruit HB workers. GAL will seek to employ contractors who have a workforce and these will include local contractors.</p> <p>Whilst the project itself is large, its demand for workers is small in the context of the size of the construction workforce</p>	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] .	Under discussion
2.19.2.10	Additionality assumptions	<p>It is unclear to what extent additionality assumptions have been accounted for in the estimates of GVA and employment effects including direct, indirect, induced and catalytic effects. Paragraph 6.3.5 states that estimating net direct, indirect and induced impacts requires assumptions on displacement that are difficult to determine robustly. Whilst it is acknowledged that estimating levels of displacement can be tricky, assumptions can still be applied through the application of a precautionary approach and use of benchmarks.</p> <p>Updated position (Deadline 1): Applicant hasn't explained the assumptions made with regards to additionality. Table 6.1 provides total job numbers but does not provide any explanation on assumptions.</p>	<p>The estimate of total net effect (direct, indirect, induced and catalytic) ie taking account of additionality is set out in Table 6.1.</p> <p>Para 6.3.5 is referring to estimating net DII only.</p>	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200] .	Not Agreed
2.19.2.11	Approach to calculating operational employment	<p>Clarification is required from the Applicant with regards to its approach and calculations in relation to operational employment.</p>	<p>The approach to calculating operational employment is fully explained in the ES chapter and appendices.</p>	ES Appendix 17.9.2 Local Economic	Not Agreed

		<p>Updated position (Deadline 1): Awaiting Consultant input following TWG 15 Feb</p>		<p>Impact Assessment [APP-200].</p>	
2.19.2.12	Sensitivity and magnitude gradings	<p>The Applicant needs to revisit the sensitivity and magnitude gradings for several assessments in the Socio-Economic chapter of the ES (Chapter 17).</p> <p>Updated position (Deadline 1): Whilst the Applicant presented their method and assessment at the TWG sessions, these were not agreed with by the local authorities who provided written feedback on their concerns to the Applicant.</p> <p>CBC has concerns related to sensitivity and magnitude criteria for several socio-economic receptors.</p>	<p>An overview of the baseline environment is set out in Section 17.6 of ES Chapter 17: Socio-Economic, including the economic and labour market baseline, population and housing baseline, and community facilities baseline. Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023.</p> <p>A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. Local authority level outputs are also provided. A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In response to the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and housing effects, outputs are given at a local authority level within Annexes including for the key scenarios a total specifically for the NWS HMA.</p>	<p>ES Chapter 16: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197].</p>	Not Agreed
2.19.2.13	Assessment at local authority level	<p>The assessment of socio-economic effects has been undertaken at different geographical levels but has not assessed impacts at a local authority level. This is despite ongoing concerns raised concerning labour supply, housing (including affordable housing) and temporary accommodation in Crawley. As a result of this approach, the assessment does not identify specific impacts on Crawley.</p> <p>Updated position (Deadline 1): An assessment of impacts is required at the local authority level.</p>	<p>An overview of the baseline environment is set out in Section 17.6 of ES Chapter 17: Socio-Economic, including the economic and labour market baseline, population and housing baseline, and community facilities baseline. Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs,</p>	<p>ES Chapter 16: Socio-Economics [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197].</p>	Not Agreed

		<p>Whilst the Applicant presented their method and assessment at the TWG sessions, these were not agreed with by the local authorities who provided written feedback on their concerns to the Applicant.</p>	<p>including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023.</p> <p>A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. Local authority level outputs are also provided. A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In response to the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and housing effects, outputs are given at a local authority level within Annexes including for the key scenarios a total specifically for the NWS HMA.</p>		
Assessment					
2.19.3.1	Workplace earnings trends and impact on affordability	<p>Workplace earnings are shown to be growing at a higher rate than resident earnings and it is implied this may lead to less out-commuting. This trend could impact the affordability ratio, which would have implications elsewhere in the socio-economic evidence, for example, assumptions on future housing growth and demand for affordable housing.</p> <p>Updated position (Deadline 1): Assessment is required at the local authority level to inform potential implications on future housing growth and demand for affordable housing. CBC would reiterate that it is not able to meet its affordable housing need in full within the borough, so there is a significant under-supply of affordable even without the DCO.CBC is particularly concerned about the impact of temporary accommodation demand for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>	<p>In response to the Autumn 2021 consultation greater clarity was sought on the number, type, quality, and location of jobs created by the Project; GAL's response set out the further work that would be undertaken in this regard, including assessing the impact on temporary housing need during construction and housing need across different tenures during operation. In the Summer 2022 response a similar comment was made, that housing affordability should be considered and include types and tenures for new workers and concerns that the assessment did not take account of the type and quality of employment being generated and how this translates into the need for different types of housing. GAL's response reiterated that the potential need for affordable housing in the operational phase was included in the analysis.</p> <p>The Assessment of Population and Housing Effects contains specific analysis of housing need during the construction phase, including the scope within the private rented sector and another housing types/tenures to accommodate potential demand (based on peak employment). It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based</p>	<p>Consultation Report, Autumn 2021, Consultation Issues Tables [APP-219]</p> <p>Consultation Report Annex C, Summer 2022, Consultation Issues Tables [APP-221]</p> <p>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 6 and 7</p>	Not Agreed

			on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.		
2.19.3.2	Assessment of sensitivity of receptors	<p>Paragraph 17.6.121 presents a table setting out sensitivity of receptors. We question the sensitivity grading for employment and supply chain impacts labour market impacts, disruption of existing resident activities, housing supply in the HMAs relevant to LSA and FEMA, community facilities and services. The sensitivity gradings should be revisited for these receptors.</p> <p>Updated position (Deadline 1): CBC has concerns related to sensitivity and magnitude criteria for several socio-economic receptors.</p>	Section 17.4 of ES Chapter 17 Socio-Economic (APP-042) sets out in detail the updated approach adopted in the ES in relation to defining magnitude and sensitivity.	Section 17.4 of ES Chapter 17 Socio-Economic [APP-042].	Not Agreed
2.19.3.3	Assessment of construction effects	<p>Assessment of labour market effects, effects on temporary accommodation, effects on community facilities, and effects on employment during construction need to be revisited. Concerns have been raised about the sensitivity of these effects. The magnitude of effects on construction employment for all study areas is also questioned, and magnitude of labour market effects based on magnitude criteria being used. There are also potential data limitations in relation to construction employment calculations as outlined in the review of Appendix 17.9.1. The Applicant hasn't undertaken any assessment at local authority level which is considered essential given existing constraints on labour supply in Crawley.</p> <p>Updated position (Deadline 1): Assessments require revisiting and an assessment at local authority level is required. Construction skills shortages are a recognised constraint in Sussex and therefore the labour force may have to travel from outside the area (i.e. NHB).</p> <p>CBC would reiterate that it is not able to meet its affordable housing need in full within the borough, so there is a significant under-supply of affordable even without the DCO.CBC is particularly concerned about the impact of temporary accommodation demand for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>	<p>As shown in ES Chapter 17 Socio-Economics, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment, however proposed thresholds were presented during Topic Working Groups for comment</p> <p>Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic.</p> <p>Effects of the construction phase have been assessed in terms of potential impacts on the construction supply chain measured relative to the scale of construction sector enterprises (as opposed to employment which is used for direct effects only) in each of the assessment areas.</p> <p>GAL's response reiterated that an assessment of the potential demand for housing during the construction phase has been added to the Assessment of Population and Housing Effects.</p> <p>As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.</p>	<p>ES Chapter 17 Socio-Economics [APP-042] Table 17.4.1 and corresponding parts of Sections 6 and 7.</p> <p>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].</p> <p>Section 17.9 of ES Chapter 17: Socio-Economic [APP-042].</p> <p>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 6</p>	Under discussion
2.19.3.4	Assessment of construction effects during the first year of operation	Assessment of construction effects during the first year of operation (including labour market effects, effects on population, effects on temporary accommodation, construction noise impacts on residents,	Please see the response provided above within this table. Lower levels of construction workforce numbers are assessed within the ES e.g. at para 17.9.81.	n/a	Under discussion

		<p>effects on community facilities, and effects on construction employment) need to be revisited. The magnitude score of high for all study areas is questioned. The number of construction jobs would appear unlikely to have a significant beneficial effect in the FEMA and LMA. It should also be noted that the construction jobs calculation appears to be based on a “maximum” scenario. The Applicant hasn’t undertaken any assessment at local authority level.</p> <p>Updated position (Deadline 1): Assessments require revisiting and an assessment at local authority level is required.</p> <p>CBC would reiterate that it is not able to meet its affordable housing need in full within the borough, so there is a significant under-supply of affordable even without the DCO. CBC is particularly concerned about the impact of temporary accommodation demand for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>			
2.19.3.5	Operational effect	<p>Assessment of operational labour market effects, effects on housing, population and community facilities and services need to be revisited. We have outlined our concerns above in relation to the magnitude criteria being used for this assessment and the sensitivity grading of this receptor for the LMA and FEMA. The Applicant also hasn’t undertaken any assessment at local authority level.</p> <p>Updated position (Deadline 1): Assessments require revisiting and an assessment at local authority level is required.</p> <p>CBC would reiterate that it is not able to meet its affordable housing need in full within the borough, so there is a significant under-supply of affordable even without the DCO.</p>	<p>Please see the response provided at Row 3.6 and 3.12 of this table. for sensitivity/magnitude criteria.</p> <p>ES Chapter 17: Socio-Economics provides an assessment of the Project’s effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.</p> <p>Section 17.9 of ES Chapter 17: Socio-Economics provides an assessment of the indirect, induced, catalytic effects arising from the operational phase of the Project, based on the data in ES Appendix 17.9.2: Local Economic Impact Assessment. The assessment within ES Chapter 17 is provided on the basis of study areas, including Six Authorities Areas and Northern West Sussex Functional Economic Market Area and as well as nationally. Detailed data at the local authority level is contained in Table 3.1.2 of ES Appendix 17.6.1: Socio-Economic Data Tables.</p>	<p>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</p> <p>ES Chapter 17: Socio-Economics [APP-042]</p> <p>ES Appendix 17.6.1: Socio-Economic Data Tables [APP-197]</p> <p>ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p>	Under discussion
2.19.3.6	Water neutrality implications on housing delivery	<p>It is not correct for the Applicant to surmise at 4.3.11 that the Local Authorities (as of August 2021) would have been able to take account of water neutrality implications on housing delivery through their trajectories. Issue of the Natural England Position Statement in September 2021 instantly applied water neutrality requirements to planning applications, effectively stopping development as planning</p>	<p>Analysis of the potential impact of water neutrality on housing trajectories is included in the Assessment of Population and Housing Effects, including justification for why – on the basis of this analysis - this was not taken forward within the scenario modelling.</p>	<p>Para 4.3.8 onwards of ES Appendix 17.9.3 Assessment of Population and</p>	CBC not pursuing this point

		<p>applications could not be consented without having demonstrated water neutrality. As such, the housing delivery implications of water neutrality were not fully understood as of August 2021. Furthermore, the Applicant has not used the latest housing delivery reports which would take account of these issues.</p> <p>Updated position (Deadline 1): CBC Modifications Local Plan is currently out for consultation. This sets out a revised trajectory that does factor in water neutrality. However, CBC are not raising concerns about the impact of water neutrality.</p>		Housing Effects [APP-201] .	
2.19.3.7	Assessment of impacts on labour supply	<p>Paragraph 5.2.14 states that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area (Croydon and East Surrey) where the project tips surplus into supply in a single year. The basis for this conclusion does not appear robust, as based on the analysis the project is shown to exacerbate labour shortfall issues across multiple areas. Furthermore, if underlying inputs in the model are changed to reflect the fact that the labour market is already more constrained as has been modelled, it is likely shortfalls would be greater across many of the areas.</p> <p>Updated position (Deadline 1): Construction skills shortages are a recognised constraint in Sussex and therefore the labour force may have to travel from outside the area (i.e. NHB). CBC is concerned about the impact on temporary accommodation in particular, e.g. see Rows 3.10 and 3.13. We would also draw attention to the identified skills shortage in Crawley, as this may have implications for the availability of suitable labour.</p>	<p>The assessment shows that across the study area as a whole there is a labour surplus even with the project as well as a surplus in individual housing market areas except Croydon and East Surrey.</p> <p>The assessment is very conservative in assuming all jobs are net additional above the forecasts and that there is no change in employment or economic activity rates or commuting.</p> <p>As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.</p>	ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201] .	Under discussion
2.19.3.8	Vacant properties	<p>In paragraph 6.2.3-6.2.4 the Applicant 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 bringing them back into use.</p> <p>Updated position (Deadline 1): CBC is particularly concerned about the impact of temporary accommodation demand for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers, however limited, will exacerbate this. See LIR information.</p>	To determine the potential housing effects, the number of NHB workers (ie those who will temporarily migrate to the area) allocated to each local authority area has been compared with the total number of bed spaces available in the private rented sector. Table 6.1.1 of ES Appendix 17.9.3 sets out the distribution of NHB construction works (at peak) within the key authorities. The numbers in any single local authority are very small and their lengths of stay will be relatively short. In Crawley the peak number of NHB workers is estimated to be only 115 and not all of these will seek PRS accommodation.	ES Chapter 17 Socio-Economic [APP-042] . ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] .	Not Agreed
2.19.3.9	Impacts on affordable housing	Paragraph 7.5.1 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	Paragraph 7.5.1 talks about proportions not numbers. The absolute level of demand is significantly lower than the supply of stock.	Consultation Report Annex A, Autumn 2021, Consultation	Not Agreed

		<p>at local authority level are being hidden. Secondly, assessment goes on to conclude 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. However, analysis of completions by local authority (Table 7.4.1) has demonstrated that the delivery frequently does not meet the need, and therefore a shortfall is likely. On that basis, the conclusion that the project is unlikely to have any impact on affordable housing demand beyond what is planned for does not appear well founded.</p> <p>Updated position (Deadline 1): The Project will increase pressures on supply of affordable housing.</p> <p>Applicant should undertake assessment at local authority level to ensure greater understanding of any future impact from the permanent workforce on the unmet affordable housing need. This is a particular concern for Crawley, as the borough's affordable housing need is almost as high as its overall housing need of which only 42% can be met within the borough</p>	<p>The proportions being delivered are higher than the proportion of demand from workers.</p> <p>In addition, many of the workers will already be resident in the area so will not constitute new housing demand.</p> <p>The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p> <p>As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.</p>	<p>Issues Tables [APP-219]</p> <p>Consultation Report Annex C, Summer 2022, Consultation Issues Tables [APP-221]</p> <p>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] Section 6 and 7.</p>	
2.19.3.10	Private rented sector (PRS) accommodation	<p>Section 6.3 provides details 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</p> <p>Updated position (Deadline 1): There are question marks concerning number of NHB workers.</p> <p>CBC is particularly concerned about the impact of temporary accommodation demand for construction workers as Crawley has a shortage of short term private rented accommodation which is increasing the pressure on social housing and creating longer waiting lists. Increased demand from NHB workers will exacerbate this. See LIR information.</p>	<p>Paragraph 3.5.4 explains how the estimate has been derived.</p> <p>Table 6.5 shows that even if all NHB workers sought PRS accommodation (which they will not – some will seek B&Bs) the highest demand as a share of stock in any local authority is 0.68%. This is well below any reasonable estimate of vacancy rates in the PRS.</p> <p>The English Housing Survey reports vacancy rates in the PRS that are over twice as high as in the social rented and owner occupied sectors and in 2019/20 (the last available data) these were 10%.</p>	<p>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].</p>	Not Agreed
Mitigation and Compensation					
2.19.4.1	Lack of information on implementation plan, performance, measurable targets, funding and financial management,	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 the Applicant is unable to provide further details on these arrangements within the	<p>Please refer to ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198) for details.</p> <p>The plan will include more specific detail on the objectives, initiatives and activities, targets, milestones, implementation</p>	<p>ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].</p>	Under discussion

	<p>monitoring and reporting. Route map from ESBS to implementation Plan is not identified.</p>	<p>ESBS which is the control document 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. Given the Applicant is currently suggesting that the majority of the relevant content for the local authorities will be set out in the Implementation Plan, it is essential that the Applicant provides further details on the process for delivering this.</p> <p>Updated position (Deadline 1): More detailed information is required in the ESBS as set out in our response.</p>	<p>processes and partners, including how objectives will be met at the local level. The approach to monitoring and evaluation of actions and impacts will be included. GAL recognises that the skills, employment and business growth and productivity fields are dynamic and fast-moving in terms of national and local policy responses, skill needs and demands and technological changes. The project will be delivered over a period of 15+ years. Thus, the strategy and implementation plan will need to incorporate capacity for the projects and associated targets and outcomes to flex and change in response effectively to changing circumstances as required</p> <p>The ESBS Implementation Plan will describe how GAL will collaborate with partners to define and implement a clear regional 'identity' and promotion strategy. Initial scoping research, informed by a partner workshop, has just completed and the recommendations will inform the Implementation Plan.</p>		
<p>2.19.4.2</p>	<p>Local benefits for Crawley residents</p>	<p>The uncertainty regarding how Crawley's residents will access the proposal's future economic benefits, how specifically Crawley's residents will benefit economically and insufficient confidence in how such economic benefits for Crawley's residents will be secured and delivered.</p> <p>Updated position (Deadline 1): More detailed information is required in the ESBS as set out in our initial response in Row 2.19.4.1.</p>	<p>The assessment sets out the likely distribution of new employees, including Crawley residents, based on the current distribution of employees. Crawley residents will not need to do anything special in order to be able to benefit.</p> <p>GAL proposes enhancing the ability of target groups to access employment through the ESBS. The Implementation Plans underneath the ESBS will set out how measures will be targeted (by area or group) and these will be agreed and delivered in partnership with local partners including CBC.</p> <p>It is confirmed within the Socio-Economic Chapter that the Local Study Area incorporates the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge. The selection of output areas is based upon a 'best fit' match of the urban area surrounding Gatwick, incorporating the main towns of Crawley and Horley and some smaller settlements located near to the Project site boundary such as Charlwood, Copthorne, Hookwood, Ifieldwood, Salfords and Smallfield. A map of the Local Study Area is also provided.</p> <p>The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. The assessment is available to view on PINS website.</p>	<p>ES Chapter 17 Socio-Economics [APP-042] paras 17.4.8-13 and Socio-Economic Effects Figures [APP-052] Figure 17.4.1 ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].</p>	<p>Under discussion</p>

			The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.		
Other					
2.19.5.1	Incomplete consideration of local planning policies.	<p>The review of policies is considered incomplete (only three adopted policies identified for Crawley and limited analysis of how the Project aligns with these. No analysis of some of the potential constraints brought about by the Project on Crawley.</p> <p>Updated position (Deadline 1): All relevant socio-economic policies should be identified and included in the chapter. These will be set out in the LIR.</p>	<p>Appendix 17.2.1 sets out further policies from the Submission Draft Crawley Borough Local Plan.</p> <p>Alignment with policy is set out in the Planning Statement.</p> <p>The Socio-Economic ES chapter considers an assessment of the constraints in the area, including labour and housing market constraints.</p>	<p>ES Appendix 17.2.1: Summary of Local Planning Policy - Socio-Economics [APP-195]</p> <p>7.1 Planning Statement [APP-245]</p> <p>ES Chapter 17 Socio-Economics [APP-042]</p>	Under discussion
2.19.5.2	AAP-030 Environmental Statement Chapter 5 Project Description states that four hotels are proposed as part of the DCO	<p>Whilst Gatwick Airport represents a sustainable location for hotels, hotels are not defined as an operational use. This raises the question as to whether the proposed hotels can be considered as part of the DCO.</p> <p>Updated position (Deadline 1): ES Chapter 5 (Project Description) (AAP-030) states that four hotels are proposed as part of the application. Through its emerging Local Plan, the Council recognises Gatwick Airport as a sustainable location for hotels, given the specific accommodation demand it generates. However, CBC would like to see further explanation from GAL to explain why they are “associated development” and to expand upon the comments made in the bullet points.</p> <p>CBC note that the Applicant’s response at Row 5.3 of Update on the Development of Local Authority Issues Trackers (Ref AS-060) sets out that “Proposals for new hotels assume a ground lease of a certain area and while prospective hotel providers may propose limited ground floor parking underneath a hotel building above this would be a commercial decision for them”.</p> <p>This appears to leave the door open for the provision of additional on-airport parking. CBC considers these works should be deleted from the DCO but, IF hotels are to be included as associated development within the DCO, additional controls are needed over these</p>	<p>Section 115 of the 2008 Act provides that development consent may be granted for “associated development” alongside “development for which development consent is required”. “Associated development” is defined as development associated with the principal development.</p> <p>As per the 'Guidance on associated development applications for major infrastructure projects' (Department for Communities and Local Government – April 2013), it is for the Secretary of State to decide on a case-by-case basis whether development constitutes “associated development”. By reference to the 'core principles' that the guidance notes the Secretary of State will take into account:</p> <ul style="list-style-type: none"> Associated development should support the construction or operation of the principal development or help address its impacts. Hotel accommodation on-site supports the operation of the airport in providing necessary accommodation for passengers. It further helps to address the airport’s impacts, as alluded to in the Councils’ comment, by reducing the need for transport between accommodation and the airport. Associated development should be subordinate to the principal development. The hotels are subordinate to the use of the airport and facilitate this use. They are not an aim in themselves. 	n/a	Under discussion

		<p>developments, including preventing hotel parking (except for operational spaces) being created in future, and there would need to be some way any future operator would be signed into the airport surface access commitments. This would be to ensure that 'sufficient but no more' parking is provided on-airport consistent with the Applicant delivering upon its Surface Access Commitments.</p>	<ul style="list-style-type: none"> • Development should not be treated as associated development if its purpose is solely to cross-subsidise the principal development. That is not the case here. • Associated development should be proportionate to the nature and scale of the principal development. The hotels are a proportionately small part of the overall proposed development. <p>In light of the above application of the 'core principles', GAL considers that it would be right for the Secretary of State to conclude that the hotels are "<i>associated development</i>", and that such a conclusion is clearly justified.</p>		
2.19.5.3	Commercial space	<p>As with hotels, the Council seeks clarity as to why commercial space is considered to fall with the scope of the DCO regime and would expect the use of this space to be restricted to airport-related employment uses only, as well as controls over future parking provision.</p> <p>Updated position (Deadline 1): CBC cannot see a Row 19.54 on Table 19 Project General Mitigation of the Update on the Development of Local Authority Issues Trackers (Ref AS-060). The Applicant's response at Row 3.86 of that document confirms that one office block is proposed, principally to replace lost airport-related office space at Destinations Place. Airport-related office use would appear to fall within the definition of associated development, but the Applicant's response appears to leave open the possibility that some of the space may be non-airport related.</p> <p>The Applicant's response at Rows 5.3 and 5.24 of AS-060 appears to clarify that no parking is proposed for new offices through the Northern Runway Project. However, CBC consider that there would still need to be controls on future use (restricting this to airport-related use) and also with regards to parking (to meet the Applicant's surface access commitments).</p>	<p><i>This issue has been responded to at Row 19.54 of Table 19 Project General Mitigation.</i></p>	n/a	Under discussion

2.20. Traffic and Transport

2.20.1 Table 2.20 sets out the position of both parties in relation to traffic and transport matters.

Table 2.20 Statement of Common Ground – Traffic and Transport Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
2.20.1.1	Robotic parking as a baseline assumption	<p>Do not agree with the applicant's assumption that 2,500 robotic parking spaces can form part of the baseline. This would significantly increase parking capacity beyond the 100 space temporary three-month trial and would significantly increase parking capacity, the full highway impact of which would need to be properly assessed.</p> <p>Updated position (Deadline 1): GAL advise that the proposed increase in spaces via robotic parking would come forward as Permitted Development through a phased approach, with CBC to be consulted at the appropriate times. As part of PDR consultation, CBC would ask GAL to demonstrate that a proposed increase in parking is justified by evidence of demonstrable need and having regard to GAL's surface access commitments as per Local Plan Policy GAT3 and the S106 legal agreement.</p> <p>At the present time, the proposed 2,500 space increase has not been justified by evidence, which GAL would presumably provide at the time of each PDR consultation. If that is the case, it is unclear what (if any) evidence is presently in place to demonstrate that a substantial 2,500 space increase through PDR would be consistent with the 'demonstrable need' approach and the meeting of surface access commitments placed on GAL through the S106 legal agreement.</p> <p>GAL appears to be assuming that all 2,500 PDR parking spaces can be taken as a given at this stage. However, this assumption is made some way in advance of the individual PDR consultations that GAL advise would be submitted in 2024/25/26. Given that each of those PDR consultations would be expected to be supported by sufficient evidence to demonstrate 'sufficient but no more parking' than is needed to ensure GAL's mode share obligations can be met, it is not considered appropriate for GAL to simply assume, without providing justification through evidence, that 2,500 robotic spaces coming forward through PDR can be considered as forming part of the baseline. It would be more appropriate if GAL were to include this parking as part of the DCO.</p>	As explained in Section 4.4 of ES Chapter 4, a GPDO Consultation was submitted for a trial of Robotic Parking in 2019 (Crawley Borough Council reference CR/2018/0935/CON). The trial was delayed due to COVID-19 pandemic. It is proposed to extend robotic parking over a larger area of existing car park to provide the additional 2,500 spaces in three phases - 500 spaces in 2024 and 1000 spaces in each of 2025 and 2026. These further phases will also come forward as permitted development subject to GDPO consultations with Crawley Borough Council.	Section 4.4 of 5.1 ES Chapter 4 Existing Site and Operation [APP-029]	Not Agreed
2.20.1.2	Updated Staff Travel Survey	CBC note that GAL has now received initial results from its updated 2023 staff travel survey. Much of GAL's evidence is relying on data from the 2016 and 2019 staff surveys, and there is a question as to how robust	The 2023 staff travel survey is currently being analysed and results will be shared with CBC once available.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Under discussion

		<p>this approach is if the 2023 survey is showing changes in staff travel habits since the earlier surveys.</p> <p>Updated position (Deadline 1): Noted and CBC welcome the sharing of these results. Please could GAL provide a timeline as to when these findings will be available? If there is an opportunity for the DCO to be informed by the most up-to-date information, this would be preferable to a reliance on older data that may reflect significantly different (pre pandemic) travel habits.</p>			
Assessment Methodology					
2.20.2.1	Methodology used to identify amount of new passenger parking	<p>Unclear what methodology has been used to identify the overall increase in parking numbers.</p> <p>Updated position (Deadline 1): CBC welcome that additional work is being undertaken and may wish to make further comments when this is made available. It will be important that the further information being prepared reflects Local Plan Policy GAT3 (regarding demonstrable need), and the Gatwick ASAS and 106 legal agreement (regarding sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is commensurate to GAL achieving its surface access commitments). The applicant will need to demonstrate that the amount of parking proposed through the DCO (which CBC consider should include the 2,500 robotic spaces) is justified within the context of GAL's Surface Access Commitments.</p>	<p>Further information is being prepared on the justification for the required car parking spaces. This will be shared with the local authorities in due course.</p> <p>Updated position (Deadline 1): A Car Parking Strategy will be submitted as part of Deadline 1.</p>	Car Parking Strategy (Doc Ref. 10.5)	Under discussion
2.20.2.2	On-airport parking	<p>The Council agrees that providing any necessary new parking on airport, where justified by a demonstrable need, is the most sustainable strategy, as per the approach of Policy GAT3 of the adopted and emerging Crawley Local Plans. However, the methodology used to identify the overall increase in parking numbers, and therefore how the parking numbers fit within the overall strategy and commitments for sustainable surface access, remains unclear.</p> <p>Updated position (Deadline 1): CBC welcome that additional work is being undertaken and may wish to make further comments when this is made available. It will be important that the further information being prepared reflects Local Plan Policy GAT3 (regarding demonstrable need), and the Gatwick ASAS and 106 legal agreement (regarding sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is commensurate to GAL achieving its surface access commitments). The applicant will need to demonstrate that the amount of parking proposed through the DCO (which CBC consider should include the 2,500 robotic spaces) is justified within the context of GAL's Surface Access Commitments.</p>	<p>Further information is being prepared on the justification for the required car parking spaces. This will be shared with the local authorities in due course.</p> <p>Updated position (Deadline 1): A Car Parking Strategy will be submitted as part of Deadline 1.</p>	Car Parking Strategy (Doc Ref. 10.5)	Under discussion
Assessment					

There are no issues relating to the assessment of this topic within the Statement of Common Ground.					
Mitigation and Compensation					
2.20.4.1	Surface Access Commitments - target mode shares	<p>Insufficient evidence and justification provided to demonstrate how the target mode shares will be achieved. Stronger commitment to the aspirational mode shares should be made.</p> <p>Updated position (Deadline 1): CBC note that the measures and interventions listed in Chapter 7 do not appear to include any improvements to rail access, even though this is a key means of public transport access to the airport. No further information has been provided, so there is no change in authority position.</p>	The committed mode shares are the result of the interventions tested in the strategic model. This is set out in Chapter 7 of the Transport Assessment. The SACs sets out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach.	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>ES Chapter 12 Traffic and Transport [AS-076].</p> <p>Transport Assessment [AS-079] and associated annexes.</p>	Not Agreed
2.20.4.2	Surface Access Commitments - rail	<p>High rail mode shares are critical to the SACs but there are no measures to enhance rail services or further improve the station, despite the evidence demonstrating services on the Brighton Mainline will be overcrowded with just standing capacity available and the station will be congested at times.</p> <p>Updated position (Deadline 1): The ASAS and the Surface Access Commitments are heavily reliant on rail access to the airport. Trains are already overcrowded, and whilst the assessment may show the Project does not significantly increase overcrowding, it will have a negative effect (due to there being a greater number of passengers) on the ability to increase rail mode share by rail. Further consideration should be given to interventions that would support an improvement to rail services to encourage greater use.</p>	The rail assessment shows that in some instances by time periods and direction, there is no spare seated capacity available and this is expected to occur in the future baseline even without the Project. The assessment shows no significant increase in rail crowding (including crowding in peak periods) is expected as a result of the Project. The assessment includes all committed improvements proposed by the rail industry, but the last Control Period considered for improvements is CP7 (which is to 2029). Therefore the modelling assumes no further improvements between 2029 and 2047 which is considered a conservative assumption.	Chapter 9 of Transport Assessment [AS-079]	Not Agreed
2.20.4.3	Surface Access Commitments – Active Travel connections	<p>Enhancements to routes beyond the immediate airport connecting to wider networks, particularly improvements to NCR21 south to Crawley are essential to meet staff mode share targets, given how low current AT mode share is.</p> <p>Updated position (Deadline 1): There is a lot of reference to works alongside highway and how the PRoW link to the highway network which is of course welcomed, but the Northern Runway Project also offers opportunities to enhance the general area for off road routes for active travel and recreational access as well.</p>	The physical improvements as part of the Project form part of our commitment to supporting more active travel by employees living close to the airport, which includes a specific mode share target as set out in the Surface Access Commitments document. An ASAS will be developed to support delivery of the mode share commitments in the SAC document in due course and as part of the ASAS we will continue to engage with local authorities on the need for and provision of active travel infrastructure and related measures as we seek to achieve the commitments we have set out.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not Agreed
2.20.4.4	Surface Access Commitments– Bus services	Commitments made in relation to bus and coach service provision should include Route 200 (from Horsham, through Crawley’s western neighbourhoods and Manor Royal to Gatwick Airport). Bus priority	The proposed surface access highway improvements for bus and coach services and their passengers include improved network performance (as shown in the results of the highway network local modelling set out in section 13 of the Transport Assessment [AS-	Transport Assessment, Section 13 Highway Network: Local	Not Agreed

		<p>measures across the network to reduce journey times should also be included.</p> <p>Updated position (Deadline 1): No further information has been provided, so there is no change in authority position.</p> <p>CBC would reiterate that commitments made in relation to bus and coach service provision should include Route 200, recognising this as an important service in accessing the airport from Crawley’s western neighbourhoods.</p> <p>The council would again reiterate its point that bus priority measures should be considered.</p>	<p>079], increased network resilience and safety improvements (through grade separation of the existing junctions), improved network connectivity (through the introduction of right turn movements from NT) and improved active travel connections at bus stops.</p> <p>The provision of additional dedicated bus/coach infrastructure as part of the surface access highways scope in the form of further carriageway widening to accommodate additional dedicated bus lanes or further widening of junctions to accommodate additional dedicated bus slip lanes is not considered to be required to achieve the mode share targets set out in the SACs and would result in impacts to existing site features, safety challenges due to the short distances between junctions and the impact to other users and limited further benefits for journey time improvements.</p> <p>The Surface Access Commitments document sets out the bus and coach services identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility.</p> <p>The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares.</p>	<p>Modelling [AS-079]</p> <p>Commitments 5, 6 & 7 of the ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	
2.20.4.5	Surface Access Commitments - Funding	<p>No indication of scale of funding for the Transport Mitigation Fund, nor the nature and scale of funding for off-airport parking enforcement. Commitment to continue the parking levy to support the Sustainable Transport Fund is welcomed but the amount per space needs to increase to compensate for the proportionate decrease in staff and passenger parking.</p> <p>Updated position (Deadline 1): Preparation of further information by the applicant is welcomed.</p>	<p>Further information is being prepared on the application of these measures in support of the Surface Access Commitments.</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion
2.20.4.6	Surface Access Commitments – enforcement	<p>The proposed monitoring framework does not demonstrate how remedial action, should it be necessary, will be secured nor what sanction will be in place should commitments remain unmet.</p> <p>Updated position (Deadline 1): CBC note that the Applicant commits to producing an action plan to identify such additional interventions which they consider reasonably necessary to correct any issues of non-achievement of the surface access commitments. We also note that should two successive Annual Monitoring Report (AMR) show that the targets have not been met, the Applicant commits to providing a further</p>	<p>The SAC set out the monitoring strategy which is in keeping with the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group.</p>	<p>Section 6 of the ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>Paragraph 6.2.6 of the ES Chapter 12</p>	Not Agreed

		<p>action plan which will be provided to the TFSG so that the group can consider this and comment on it and either approve or reject the plan.</p> <p>Given the annual nature of the AMR, long periods of time could pass when the SACs are not being met and it is not clear whether the additional measures put forward by the Applicant are successfully addressing the identified issues. CBC is of the view that a more robust approach is required to ensure that growth in passenger numbers is suitably aligned with the applicant delivering upon its surface access commitments.</p> <p>It is for this reason that CBC consider that greater certainty should be provided through a 'Green Controlled Growth' approach similar to that progressed at Luton Airport, whereby the growth of the airport is linked to the meeting of the relevant targets associated with surface access transport. This would provide a more effective mechanism (as opposed to GAL's proposed approach of additional interventions and annual review) to ensure that passenger growth is aligned with delivery of the surface access commitments.</p>		Traffic and Transport [AS-076]	
2.20.4.7	Insufficient mitigation	<p>Insufficient mitigation is proposed to encourage substantial modal shift towards active and sustainable travel.</p> <p>Updated position (Deadline 1): There is not sufficient information to demonstrate how the mode share targets will be met. There is an opportunity here to increase the attractiveness of alternative modes of travel, i.e. through bus priority measures to deliver journey time savings, or a clearer approach as to what rail interventions can be made. Such measures could enable a greater percentage of staff and passengers to access the airport via sustainable transport modes.</p>	<p>Commitments are set out in the SAC for the Project. The assessment shows that the Project as proposed would not generate significant adverse effects related to traffic and transport and therefore no further mitigation is required.</p>	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not Agreed
2.20.4.8	Increasing attractiveness of alternative modes of travel	<p>The focus of mitigation has been upon provision of services rather than implementing measures, within GAL's control, to increase the attractiveness of alternative modes of travel, for example, better locations for and improvements to local bus stops at the Airport, and bus priority measures across the network of routes to deliver journey time savings. Required bus priority measures include those within the Airport itself, and as part of the new highway schemes, as the Council is aware of delays experienced by local bus operators in the immediate environs of the Airport.</p> <p>Updated position (Deadline 1): The focus of mitigation has been on the provision of service rather than implementing measures to increase the attractiveness of alternative modes of travel.</p>	<p>This issue has been responded to previously at Row 5.95 and Row 5.242 of Table 5 in Appendix 1.</p> <p>The proposed surface access highway improvements for bus and coach services and their passengers include improved network performance (as shown in the results of the highway network local modelling set out in section 13 of the Transport Assessment [AS-079], increased network resilience and safety improvements (through grade separation of the existing junctions), improved network connectivity (through the introduction of right turn movements from NT) and improved active travel connections at bus stops.</p> <p>The provision of additional dedicated bus/coach infrastructure as</p>	Transport Assessment, Section 13 Highway Network: Local Modelling [AS-079]	Not Agreed

			<p>part of the surface access highways scope in the form of further carriageway widening to accommodate additional dedicated bus lanes or further widening of junctions to accommodate additional dedicated bus slip lanes is not considered to be required to achieve the mode share targets set out in the SACs and would result in impacts to existing site features, safety challenges due to the short distances between junctions and the impact to other users, and limited further benefits for journey time improvements.</p> <p>Design details for reconfiguration of Gatwick's internal forecourt roads including the associated bus infrastructure are to be developed at the detailed design stage.</p>		
2.20.4.9	Monitoring framework	<p>The proposed monitoring framework does not demonstrate how remedial action, should it be necessary if mode share targets are not met, will be secured nor what sanction will be in place should commitments remain unmet.</p> <p>Updated position (Deadline 1): As per the council's response to Row 5.6 above, the applicant's proposed approach could result in long periods of time when the SACs are not being met. It is not clear whether the additional measures put forward by the Applicant are successfully addressing the identified issues. CBC is of the view that a more robust approach is required to ensure that growth in passenger numbers is suitably aligned with the applicant delivering upon its surface access commitments.</p> <p>It is for this reason that CBC consider that greater certainty should be provided through a 'Green Controlled Growth' approach similar to that progressed at Luton Airport, whereby the growth of the airport is linked to the meeting of the relevant targets associated with surface access transport. This would provide a more effective mechanism (as opposed to GAL's proposed approach of additional interventions and annual review) to ensure that passenger growth is aligned with delivery of the surface access commitments.</p>	<p>The SACs set out the monitoring strategy which is in keeping with the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group.</p>	<p>Section 6 of ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>Paragraph 6.2.6 of the ES Chapter 12 Traffic and Transport [AS-076].</p>	Not Agreed
2.20.4.10	Modal share targets	<p>The surface access commitments include modal share targets of a minimum of 55% of air passenger journeys to and from the Airport made by public transport, and a minimum of 55% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes. It is not clear how commitments are to be secured in the absence of an Airport Surface Access Strategy associated with the DCO.</p> <p>Updated position (Deadline 1): No further information has been provided, so there is no change in authority position.</p>	<p>The mode share commitments are secured through the SACs document, which itself is secured through a requirement to the draft DCO.</p>	<p>Requirement 20 of Schedule 2 to the Draft DCO [AS-004].</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Not Agreed

2.20.4.11	Parking controls and monitoring	<p>Parking controls and monitoring: the Council welcomes Commitment 8 that GAL will fund support for effective parking controls and monitoring on surrounding streets if necessary and support local authorities in enforcing against unauthorised off-airport passenger car parking. The commitment should be clear that this support is offered in the context of GAL achieving its sustainable access targets/commitments.</p> <p>Updated position (Deadline 1): It is anticipated that further discussion will be necessary through the S106 drafting process to identify an appropriate level of funding and (given the complexity of monitoring and enforcement against unauthorised sites) detail effective measurable outcomes.</p>	This is noted.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Under discussion
2.20.4.12	Sustainable Transport Fund	<p>The Surface Access Commitments document sets out a commitment from GAL to the continuing use of the Sustainable Transport Fund (STF), calculated from the car park space levy and retaining the current annual increase, to help achieve mode share commitments. The Council welcomes continuation of the STF. However, it is noted that the Airport will have more passengers and fewer spaces (which is consistent with the sustainable mode share obligations) but because the STF is partly linked to the number of passenger spaces, the STF will effectively be receiving less funding as a percentage of passengers at a time when more funding is needed to support sustainable access to the airport to offset that increase in passenger numbers. Paragraph 5.2.12 refers to the forecourt charge continuing to contribute to the SFT, but it no longer refers to monies from Red Route infringements (as is currently the case) contributing. A Transport Mitigation Fund is also proposed to redress impacts after they have occurred, but it is not clear what level of funding this will provide nor the criteria for allocating funding. Given the need to offset increased passenger numbers with improved sustainable transport opportunities, the Council would be concerned if there were to be a proportionate reduction in GAL's financial contribution to sustainable transport.</p> <p>Updated position (Deadline 1): Noted. CBC welcome the further work being undertaken by the Applicant and would be keen to discuss any suggested methodology and funding levels put forward by the Applicant.</p>	Noted. Further information is being prepared on the application of these measures in support of the Surface Access Commitments.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Under discussion
Other					
2.20.5.1	Staff Parking Numbers	<p>Whilst supporting the objective to increase staff travel by sustainable modes, it is not clear how the 1,150 space reduction in staff parking relates to sustainable mode share objectives especially since there will be more staff at the airport as a result of the project.</p> <p>Updated position (Deadline 1): CBC welcome that additional work is being undertaken and may wish to make further comments on it.</p>	<p>Further information is being prepared on the justification for the required car parking spaces. This will be shared with the local authorities in due course.</p> <p>Updated position (Deadline 1): The Car Parking Strategy (Doc Ref. 10.5) has been submitted as part of Deadline 1.</p>	Car Parking Strategy (Doc Ref. 10.5)	Under discussion

2.20.5.2	Passenger parking offer and pricing	<p>Unclear if GAL intends to offer a range of parking at different price levels – this is important to ensure a balanced approach between supporting sustainable transport mode share and offering an appropriate range of on-airport parking for those who do need to drive (on-airport parking being more sustainable than off-airport parking).</p> <p>Environmental Statement Chapter 5 (APP-030) details car parking areas and spaces to be lost and replaced. We note that some 3,345 ‘Summer Special’ spaces would be lost, an offer that is at the more affordable end of GAL’s pricing range. Do GAL intend to retain the range of pricing and parking packages that are currently available on airport?</p> <p>Updated position (Deadline 1): CBC welcome that additional work is being undertaken and may wish to make further comments on it.</p>	<p>Further information is being prepared on the justification for the required car parking spaces. This will be shared with the local authorities in due course.</p> <p>Updated position (Deadline 1): The Car Parking Strategy (Doc Ref. 10.5) has been submitted as part of Deadline 1.</p>	Car Parking Strategy (Doc Ref. 10.5)	Under discussion
2.20.5.3	Permitted development rights	<p>GAL has extensive permitted development rights which include the provision of parking, and the Council is concerned that there is no control through the dDCO or proposed s106 agreement to prevent these being used to create an overprovision of parking in the future, undermining the surface access commitments.</p> <p>Updated position (Deadline 1): Further discussion on this matter is required.</p>	Discussions with respect to the S106 agreement will take place in due course.	n/a	Under discussion

2.21. Waste and Materials

2.21.1 **Table 2.21** sets out the position of both parties in relation to waste and materials matters.

Table 2.21 Statement of Common Ground – Waste and Materials Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Waste and Materials</i>					

2.22. Water Environment

2.22.1 Table 2.22 sets out the position of both parties in relation to water environment matters.

Table 2.22 Statement of Common Ground – Water Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
2.22.2.1	Assumptions	<p>The Updated flood compensation plan shows that there will be a reduction in size of (i) the Museum Field and Car Park X flood compensation areas, (ii) removal of the flood compensation area to the south of Crawley Sewage Treatment Works and the small area to the east of Museum Field and (iii) the removal of the surface water drainage Pond A and the extension to Dog Kennel Pond from the initial proposal of GAL to provide additional flood storage.</p> <p>CBC has insufficient detail to accept the assumptions set out in this update and request that it is provided with further information.</p> <p>Inconsistency with the design life of what constitute a surface access work and an airfield access work.</p> <p>Updated position (Deadline 1): CBC have requested for the attenuation requirements for 35%CC allowance and the 20%CC allowance, and that this should be compared with the storage provided by the attenuation facilities before and after the respective removal/reduction in their capacities and that this is presented in a simple tabulated format, but this was never done by GAL.</p> <p>Furthermore, the ES states that fluvial flood risk for the surface access works has been assessed using a 100-year life span and 20%CC and airfield access works for 40 years life span and 12%CC with a sensitivity test of the 40% scenario while for pluvial flood risk the surface access works has been assessed using a 100-year life span and 40%CC and airfield access works for 40 years life span and 25%CC with a sensitivity test of the 40% scenario for the airfields works.</p> <p>The rational for this approach here is because a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. However, it should be noted that section 2.2 describes part of the airfield access works to include extensions to the existing airport terminals (north and south); and provision of additional hotel and office spaces. These are structures with a design life span of 100 years, can GAL</p>	<p>The Floodplain Compensation Areas (with other measures) have been designed to mitigate for the loss of floodplain due to the Project for all events up to and including the 1% Annual Exceedance Probability (AEP) (1 In 100) event plus an allowance for climate change of +20% for peak river flow. This takes into account the lifetime of the Project in accordance with current guidance published by the Environment Agency.</p> <p>The reduction from 35% to 20% for peak river flow was a result of a change in Environment Agency guidance for the consideration of climate change in flood risk assessments that was published in May 2022, between the PEIR and ES stages of the Project.</p> <p>The practicality of the approach to fluvial flood mitigation is set out in the Flood Risk Assessment.</p> <p>The ES sets out the impacts of the project on the water environment. The construction of the Museum Field FCA including its connection to the River Mole is not assessed to result in significant environmental impacts. Gatwick has committed to post-construction monitoring of sediment in the River Mole at this location.</p>	<p>Section 3.7 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>ES Chapter 11: Water Environment [APP-036]</p>	Not Agreed

		clarify if these structures are planned for demolition in 40 years. Otherwise, we believe there should be a re-classification of what constitute the surface access works and the airfield works and where these will affect the climate change scenarios adequate steps should be taken to rectify this mistake.			
Assessment					
2.22.3.1	Drainage – South Terminal Roundabout substantial modification to surface water pond.	CBC request the design parameters for the new pond are provided if this proposal is to be taken forward along with details of the changes that will be carried out on the existing pond, the impact and mitigation measures and most importantly, of how water quality has been addressed in accordance with the SuDS manual. Updated position (Deadline 1): Further information regarding how water quality has been mitigated using the attenuation features in line with the SuDS manual is awaited.	Requirements 10 and 11 of the draft DCO state that approval will be required from the lead local flood authority and highways authority respectively to the drainage detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix A1 of the Design and Access Statement.	Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147] Draft DCO (Doc Ref. 2.1) Design and Access Statement Volume 5, Appendix 1 [APP-257]	Under discussion
2.22.3.2	Evidence to show that the connection between the museum field compensation storage area and the River Mole will not have a detrimental effect on the geomorphology of the watercourse bed.	CBC also requests confirmation of how the possible adverse effect of this connection will be mitigated. Updated position (Deadline 1): Further information regarding how the possible adverse effect on the watercourse geomorphology is awaited from GAL.	The adverse effects of the flood compensation area in Museum Field and the connecting spillway on the geomorphology of the River Mole have been fully assessed in the ES. Furthermore, the mitigation incorporated in principle at this stage is presented in the ES. The assessment recognises that detailed design work on the spillway would be required to mitigate the potential adverse effects.	ES Chapter 11: Water Environment [APP-036] Table 7.2.1: Initial Construction Phase Impacts for Geomorphology and Table 7.5.1: Design Year Impacts for Geomorphology of ES Appendix 11.9.1. Geomorphology Assessment [APP-142]	Under discussion
2.22.3.3	The proposed highway drainage strategy will reduce discharge by 38% to the Gatwick stream and 50% to the river Mole	Can GAL have a look at the effect this reduction in discharge will have on biodiversity and provide mitigation where necessary. Updated position (Deadline 1): While it is possible the volume of water stored within the watercourse may not change, but if the reduction in the peak runoff rate spans a long period, this may influence the ecosystem biodiversity and biomass and GAL should look further into this rather than just a volume for volume approach.	The Project would reduce peak runoff rates to receiving watercourses, volumes would not change. Therefore, no effect on biodiversity is anticipated and no mitigation is proposed.	ES Chapter 11: Water Environment [APP-036] Chapter 9 Ecology and Nature Conservation [APP-034]	Not Agreed
2.22.3.4	Overlap between drainage and ecology matters in relation	It would be good to understand the impact the drainage design and engineering solutions have on ecology in relation to matters such as	The impact of the scheme on drainage, ecology and water is fully assessed in the ES.	ES Chapter 11: Water Environment [APP-036]	Under discussion

	to the northwest area and the impact on the river Mole.	<p>sediment build up, flood overspill, de-icer storage and pollution control measures.</p> <p>Updated position (Deadline 1): Further information regarding how the possible adverse effect and mitigation measures on the watercourse biodiversity and biomass is awaited from GAL.</p>	<p>The airfield and surface access improvements drainage designs have been designed in accordance with the SuDS Manual and therefore consider their ecological impacts. Further information would become available as their detailed design is progressed after the DCO application process.</p> <p>The ecology elements are also recoded in the oLEMP, compliance with which is secured by draft DCO Requirement 8.</p> <p>Requirements 10 and 11 of the draft DCO state that approval will be required from the lead local flood authority and highways authority respectively to the drainage detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix A1 of the Design and Access Statement.</p> <p>There is currently no discharge of de-icer to the River Mole in the North West Zone (there are no contaminated discharges from Pond A or Pond M). This remains the case after the completion of the scheme as demonstrated by the modelling (see APP-036 and Table 5.2.1 APP-145)</p> <p>Maintenance proposals would be developed as part of the detailed design process. Monitoring proposals for the water environment are included in Table 11.8.1 of ES Chapter 11, which are included in the oLEMP and secured via Requirement 8 of the draft DCO.</p>	<p>ES Chapter 9 Ecology and Nature Conservation [APP-034]</p> <p>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan [APP-113]</p> <p>Design and Access Statement Volume 5: Design Principles [APP-257]</p> <p>Draft DCO (Doc Ref. 2.1)</p>	
2.22.3.5	Capacity of Crawley Sewerage Treatment Works	<p>No confirmation to date from Thames Water regarding the impact and capacity of the Crawley STW, taking into account other planned development in Crawley. If upgrades to the Works are deemed necessary, no clarity on whether this could impact on phasing for other developments.</p> <p>Updated position (Deadline 1): CBC would welcome further information regarding GAL's ongoing discussions with Thames Water, particularly to ensure other planned development in Crawley is taken into account.</p>	<p>Discussions with Thames Water are ongoing and continue with regard to the impact of the proposed scheme on Crawley WwTW. No impediment has been raised by TW to date. It is understood from discussions with Thames Water that the wastewater flow from Gatwick Airport to the Crawley works is between 2-9% of its total capacity.</p>	<p>Para 5.3.2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>Para 8.1.5 of ES Appendix 11.9.7 Wastewater Assessment [APP-150]</p>	Under discussion
2.22.3.6	De-icer	<p>The Council questions how a new de-icer treatment facility which results in a new source of effluent into Gatwick stream can be considered to have a moderate beneficial impact to water quality.</p> <p>Updated position (Deadline 1): Discharging at a higher capacity may not reduce contamination by dilution except GAL can show that the pollution indices for a 100% discharge is lesser than that for a 65%</p>	<p>The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Thames Water's Crawley Sewage Treatment Works. It will also discharge at 100l/s to the watercourse rather than the current 65l/s into Thames Water's Crawley STW, and will in effect provide additional dilution compared to the baseline.</p>	n/a	Not Agreed

		discharge. This approach by GAL needs to be statistically/academically/laboratory test proven.			
Mitigation and Compensation					
2.22.4.1	GAL has proposed an additional three hectares of carriageway will be created from the proposed work to the highway and three attenuation basins and two oversized pipes have been planned as part of the highway drainage strategy to mitigate the increase in impermeable area.	<p>The proposal can be improved, and this should be an opportunity for GAL to improve on the sustainability aspect of the Highway and in addition to water quantity provide water quality mitigation strategy in line with the SuDS manual, this should not be a case of just doing the minimum.</p> <p>Updated position (Deadline 1): It is most unlikely that the creation of additional three hectares of carriageway which will result in a significant increase in traffic movement and subsequent increase in emissions will have no impact on water quality. Can this HEWRAT assessment be provided. Furthermore, can GAL provide the pollution indices because of this increase in carriageway space and the mitigation indices in line with the SuDS manual.</p>	<p>The surface access improvements drainage strategy includes a number of SuDS measures to address the additional runoff and traffic that would result from the Project. These include oversized pipes, basins and swales.</p> <p>The use of SuDS is included in the Design Principles DDP3 and DDP5</p> <p>A HEWRAT assessment of the water quality impacts of the surface access improvements has been undertaken and no significant environmental effects have been identified.</p>	<p>Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>Design and Access Statement Volume 5: design principles [APP-257]</p> <p>ES Appendix 11.9.3 Water Quality HEWRAT Assessment [APP-144]</p>	Not Agreed
2.22.4.2	While it is understood that there is the need for GAL to attenuate water using systems that can be designed to reduce the attraction of birds.	<p>The use of concrete attenuation structures if possible be avoided.</p> <p>Updated position (Deadline 1): Further information regarding the type of the attenuation features proposed by GAL is awaited.</p>	<p>The form of the below-ground water storage in the Car Park X floodplain compensation area will be considered during the detailed design process, after the DCO application. However, the structure will need to withstand significant loading from the surrounding ground plus the above-ground Car Park Y area will be required for other purposes during project operation. Requirement 23 of the draft DCO states that GAL will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency.</p> <p>GAL has committed to achieving Net Zero for GHG emissions (GAL Scope 1 and 2) within the Carbon Action Plan, and in order to deliver this will be systematically working with design teams to reduce and avoid the need for the most carbon-intensive materials and construction processes. The storage tank proposals at Car Park Y will undergo a review from a carbon management perspective in line with this wider carbon management strategy for the development during the subsequent design phase after the DCO application. The Carbon Action Plan is secured by Requirement 21 of the draft DCO.</p> <p>With respect to the airside drainage, all of the additional attenuation features are required to be below ground for bird strike safety and land availability reasons. Additionally, the runoff can be contaminated with de-icer, therefore filtration to ground is not</p>	<p>Schedule 2 and Requirement 21 of Draft DCO (Doc Ref. 2.1)</p> <p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p>	Under discussion

			acceptable, as agreed through liaison with the Environment Agency.		
2.22.4.3	Residual risk when flood structures are overwhelmed.	<p>While GAL has proposed several mitigation strategies as it relates to flood risk, how they intend to deal with possible residual risks in the event these structures are overwhelmed or a possible blockage on the watercourse should be identified.</p> <p>Updated position (Deadline 1): The response by GAL shows that the minimum is being considered as it relates to flood risk. The residual risk from a possible breach of the proposed flood mitigation features should be considered and where possible guide the design to manage/reduce this risk.</p>	Hydraulic modelling undertaken to inform the Flood Risk Assessment as summarised in Annexes 2- 5 demonstrates that the Project would not increase flood risk to other parties. Therefore, should a watercourse blockage occur, the Project would not exacerbate subsequent effects that would occur in the existing situation.	<p>ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>ES Appendix 11.9.6: Flood Risk Assessment Annexes 1-2 [APP-148]</p> <p>ES Appendix 11.9.6: Flood Risk Assessment Annexes 3-6 [APP-149]</p>	Under discussion
2.22.4.4	Water demand mitigation	<p>No specific water use targets, and no commitments to ensure sufficient measures are delivered to mitigate water supply impacts in an area of water stress.</p> <p>Updated position (Deadline 1): Crawley is a water-stressed area, and tighter water standards are a policy requirement for all development. The Project should meet the requirements of ENV9 (and SDC3).</p>	<p>The Project does not include a target for reduction in potable water use.</p> <p>Section 3 of the Carbon Action Plan commits Gatwick to achieving net zero for Greenhouse Gas emissions by 2040 for ABAGO activities that include water consumption and treatment.</p> <p>Separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p>	<p>Para 11.5.2 and 11.6.93 of ES Chapter 11 Water Environment [APP-036]</p> <p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p>	Not Agreed
2.22.4.5	Water use targets	<p>The project has no water use targets proposed and as such would not comply with adopted sustainability policy ENV9 in the Local Plan which seeks to mitigate the impact of development in this area of recognised 'water stress'. Positive potential measures to reduce water use are listed in the Water Supply Assessment and the Water Management Plan but there are no commitments to ensure sufficient measures are delivered to mitigate water supply impacts.</p> <p>Updated position (Deadline 1): Crawley is a water-stressed area, and tighter water standards are a policy requirement for all development. The Project should meet the requirements of ENV9 (and SDC3).</p>	<p>The Project does not include a target for reduction in potable water use. However separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change, such a reduction would exceed the reduction requirements of ENV9. As a conservative approach this reduction has not been taken into account in the ES assessment.</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water who source their water from the River Medway catchment.</p>	<p>Para 11.5.2 and 11.6.93 of ES Chapter 11 Water Environment [APP-036]</p>	Under discussion
Other					

2.22.5.1	Stakeholder responses	<p>In respect of the overall drainage strategy CBC remain concerned that the concept designs did not provide sufficient. It would be helpful if GAL could share the Consultee comments from key stakeholders such as the Environment Agency to understand how aligned or otherwise, they are with our views on the drainage and FRA work done to date. It was not clear how all this has progressed from the PEIR consultation.</p>	<p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds augmented by additional below-ground attenuation to ensure no increase to flood risk.</p> <p>Table 1.1.1. of ES Appendix 11.3.1 Summary of Stakeholder Scoping Responses – Water Environment sets summarises the comments received from the Environment Agency on the PEIR.</p> <p>The consultee comments received as part of the statutory and non-statutory consultations have been summarised and responded to in Section 1.19 of Annex B to the Consultation Report [APP-220].</p> <p>The Relevant Representation made by the Environment Agency makes reference to the HEWRAT assessment stating they encourage every effort to minimise impact of road runoff.</p>	<p>Section 7.3 and Annex 2 of ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</p> <p>Table 1.1.1. of ES Appendix 11.3.1 Summary of Stakeholder Scoping Responses – Water Environment [APP-141]</p> <p>Section 1.19 of the Consultation Report Annex B, Autumn 2021, Consultation Issues Tables [APP-220]</p>	Under discussion
-----------------	-----------------------	---	--	---	------------------

3 Signatures

3.1.1 The above SoCG is agreed between the following:

Duly authorised for and on behalf of Gatwick Airport Limited, The Applicant	Name
	Job Title
	Date
	Signature
Duly authorised for and on behalf of Crawley Borough Council	Name
	Job Title
	Date
	Signature

Appendix 1: Record of Engagement Undertaken

Date	Form of Correspondence	Details
13 February 2019	In-Person Meeting	TWG on DCO Application
7 March 2019	In-Person Meeting	NRP update given to Gatwick Officers Group
8 May 2019	In-Person Meeting	TWG on NRP update
5 June 2019	In-Person Meeting	NRP update given to Local Authorities Gatwick Officers Group
20 August 2019	In-Person Meeting	TWG on Land Environment
21 August 2019	In-Person Meeting	TWG on Surface Access and Transport
28 August 2019	In-Person Meeting	TWG on Air Quality, Carbon and Climate Change, and Major Accidents and Disasters
28 August 2019	In-Person Meeting	TWG on Economics and Employment
29 August 2019	In-Person Meeting	TWG Meeting on Noise
3 September 2019	In-Person Meeting	NRP update given to Gatwick Officers Group
18 September 2019	In-Person Meeting	Health Stakeholder meeting
26 September 2019	In-Person Meeting	TWG on MAAD
27 November 2019	In-Person Meeting	TWG on Consultation Update
27 January 2020	In-Person Meeting	TWG Air Quality, Carbon and Climate Change and MAAD
30 January 2020	In-Person Meeting	TWG Economics and Employment
3 February 2020	In-Person Meeting	TWG on Land Based Topics
4 February 2020	In-Person Meeting	TWG on Surface Access
5 February 2020	In-Person Meeting	TWG on Noise
6 February 2020	In-Person Meeting	TWG on Water Environment
26 February 2020	In-Person Meeting	TWG on Consultation Update
27 July 2021	Virtual Meeting – MS Teams	TWG on Surface Access
29 July 2021	Virtual Meeting – MS Teams	TWG Landscape, Visual and Land and Water Environment
3 August 2021	Virtual Meeting – MS Teams	TWG on Economy, Employment, Housing and Health
4 August 2021	Virtual Meeting – MS Teams	TWG on Health and Wellbeing
5 August 2021	Virtual Meeting – MS Teams	TWG on Land Use and Recreation, Geology, Heritage, and Ecology
12 August 2021	Virtual Meeting – MS Teams	TWG on Air Quality, Carbon and Climate Change, and MAAD
16 March 2022	Virtual Meeting – MS Teams	TWG on Post Consultation Update
4 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
11 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
12 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation update and Design)
16 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
17 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport

25 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Forecasting & Capacity)
07 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
09 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
14 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
15 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
20 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
21 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
28 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
29 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
5 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
7 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
14 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
26 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
27 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
8 August 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
16 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
26 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
27 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
28 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
3 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
4 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
14 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
19 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
21 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
31 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
1 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
2 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
7 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
8 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
8 November 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
10 November 2022	Virtual Meeting – MS Teams	Minerals Scoping meeting with WSCC/SCC

18 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ (mop up session)
23 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
24 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
29 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
30 November 2022	Virtual Meeting – MS Teams (Recorded)	LLFA/GAL meeting on FRA and River Mole culvert
2 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
5 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
6 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
8 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
12 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Major Accidents & Disasters
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise (Noise Envelope)
14 December 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
4 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
16 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
17 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
18 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon
19 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Health and MAAD
31 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
8 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
9 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
7 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
13 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air-Quality
14 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
10 November 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Highways)
11 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Greenhouse Gases
12 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Employment Skills & Business Strategy
13 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
15 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Post-COVID Modelling)
20 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise

9 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Ops and Capacity
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Catalytic Impacts Assessment
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Needs and Forecasting