



Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and East Sussex County Council

Book 10

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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 East Sussex County 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 East Sussex County 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	Signposting	Status
<i>There are no issues relating to Agricultural Land Use and Recreation in this Statement of Common Ground.</i>					

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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					
2.2.1.1	The scenarios assessed in the Environmental Statement do not provide a realistic worst-case assessment.	<p>Document 5.1, Chapter 13 Several clarifications are required to understand the Assessment Scenarios sub-section of the chapter. Paragraph 13.5.23 includes a bullet point list of assessment scenarios, including scenarios covering 2029 for both the construction and operation of the proposed development. Paragraph 13.5.24 provides further detail for the 2029 scenarios, noting there are two assessment scenarios for this year. Additional information is provided in paragraph 13.5.25 which reiterates that there are two separate scenarios for operational and construction situations, due to limitations within the traffic modelling. Paragraph 13.5.26 then provides information on a slow fleet transition case (SFT) relating to airline fleet assumptions, referencing 2029 as the first full year of opening, 2032 as an interim year and 2038 a design year. For the 2032 scenario, no mention is made that some construction works will still be ongoing (See ES Appendix 5.3.3: Indicative Construction Sequencing).</p> <p>Updated position (Deadline 1): It is welcomed that GAL propose to provide further information at the next air quality TWG. This matter will remain under discussion until this TWG has been held.</p>	<p>Traffic modelling has been undertaken for two construction scenarios, airfield construction and surface access (highways) construction. Further detail is contained in Report 7.4 of the Transport Assessment. 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>GAL proposes to set out the model scenarios and provide that summary at TWGs to be arranged for Q1 2024.</p> <p>Updated position (Deadline 1): GAL has set out the model assessment scenarios within Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p>	<p>ES Report 7.4 Transport Assessment [AS-079]</p> <p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4)</p>	Under discussion
2.2.1.2	Air quality	<p>Further clarity is needed on the baseline information that has been used to assess air quality.</p> <p>Updated position (Deadline 1): The concern is that the most up to date year of baseline information has not been used which may have increased confidence in the air quality assessment.</p>	<p>Section 13.7 of ES Chapter 13: Air Quality provides details of baseline environment. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and data.</p>	<p>Section 13.7 of ES Chapter 13 Air Quality [APP-038]</p>	Under discussion
2.2.1.3	Air quality	<p>Further clarity needed is needed on the air quality assessment scenarios; how air quality will be monitored, evaluated and reported to local authorities, as well as the robustness of the air quality model that has been used.</p> <p>Updated position (Deadline 1): The query relates to how air quality monitoring data will be used to identify where air quality outcomes are</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>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix D of the Supporting Air Quality Technical</p>	Under discussion

		<p>worse than assessed in the EnS, what the triggers would be used to identify the need for further mitigation and what the mitigation would be. This could be addressed as part of the AQAP that GAL committed to provide in the Air Quality TWG in December 2023.</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>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 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>The draft Section 106 agreement includes commitment to monitoring of air quality at current and proposed monitoring sites against relevant air quality standards. Results will be reported to the local authorities.</p> <p>Updated position (Deadline 1): GAL will provide a draft Outline AQAP to the LAs with the intention of submitting the Outline AQAP into the Examination in due course. GAL has also set out the model scenarios within Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p>	<p>Notes to the SoCGs (Doc Ref. 10.4)</p>	
<p>Assessment Methodology</p>					
<p>2.2.2.1</p>	<p>Lack of sensitivity analysis on the anticipated modal shift, and the associated air quality impacts.</p>	<p>Document 5.1, Chapter 12 Paragraph 12.8.6 of the traffic and transport chapter sets out a variety of measures to produce the modal shift assumed with the proposed development. Within the assumptions, there are controls on on-site parking numbers, parking charges and forecourt access charges. There is insufficient sensitivity analysis on these figures, including the impact on air quality if they are not achieved.</p> <p>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 success</p>	<p>The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The mode share commitments within the Surface Access Commitments document represent the position GAL is confident it can achieve, based on the modelling of mode choice and transport network operation.</p> <p>With regard to off-airport parking, the assumptions in the future baseline is set out in paragraph 12.6.74 of ES Chapter 12 (APP-037) (“Off-airport parking capacity held constant and occupancy</p>	<p>Chapter 12 of the Transport Assessment [APP-037]</p> <p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix F of the Supporting Air</p>	<p>Under discussion</p>

		<p>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 and what air quality triggers would be used.</p>	<p><i>capped at 87.5% of capacity, after which any off-airport parking demand is assumed to divert to on-airport car parks</i>). Table 12.3.2 provides a further explanation: "The number of off-airport parking spaces is assumed to remain constant in the modelling, as GAL is not able to enforce against unauthorised off-airport car parking sites and therefore cannot assume this reduction for the purposes of modelling."</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 commitment 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). The draft Outline AQAP will be provided to the LAs by 26th March (to align with Deadline 2), with the intention of submitting the outline version into the Examination in due course taking account of any feedback received.</p>	<p>Quality Technical Notes to the SoCGs (Doc Ref. 10.4)</p>	
<p>Assessment</p>					
<p>2.2.3.1</p>	<p>Missing figures and the lack of clear study area information makes it difficult to understand traffic changes in the different scenarios. This in turn makes it difficult to understand if effects predicted at receptors are reasonable over the construction and operational phases.</p>	<p>Missing figures and the lack of clear study area information makes it difficult to understand traffic changes in the different scenarios. This in turn makes it difficult to understand if effects predicted at receptors are reasonable over the not the actual roads meeting the ARN criteria (e.g. Appendix 13.6.1 Figure 2.3.1). This figure should be provided to illustrate the affected road network. No further information on the road traffic air quality study was identified in ES Appendix 13.4.1: Air Quality Assessment Methodology. However, reference to the above missing figure is made within this ES Appendix document, suggesting it has been missed in the collation of this ES Appendix.</p> <p>Updated position (Deadline 1): We welcome the commitment of GAL to provide further information. The information requested is the full ARN shown on a figure for each of scenarios modelled. With the ARNS showing locations with increased traffic flows within the ARN as red and locations with decreases in traffic flows as green.</p>	<p>The wider study area used for all assessment scenarios is detailed in Section 13.5.5 to Section 13.5.10 of ES Chapter 13: Air Quality. The wider study area includes all roads and airport sources within the 11 km by 10 km domain centred on the airport plus the Affected Road Network (ARN) defined by the transport data using the Institute of air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance.</p> <p>Model files and results were provided to the TWG via email 18th August 2023 which include the study area modelled.</p> <p>GAL is happy to liaise with the councils on further clarification requested on the study area.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Air Quality Figures Part 1 [APP-066]</p> <p>ES Air Quality Figures Part 2 [APP-067]</p> <p>ES Air Quality Figures Part 3 [APP-068]</p>	<p>Under discussion</p>

			<p>Updated position (Deadline 1): GAL has provided an updated ARN figure at Deadline 1, contained within the ES Air Quality Figures (Doc Ref. 5.2).</p>	<p>ES Air Quality Figures Part 4 [APP-069] ES Air Quality Figures Part 5 [APP-070]</p>	
2.2.3.2	Transport modelling	<p>There is a concern about the project's impacts on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, SAC, and a Site of Special Scientific Interest (SSSI). As a consequence, there is a need for GAL to consider these impacts in respect of air quality and nitrogen deposition issues as part of their modelling work.</p> <p>Updated position (Deadline 1): ESCC wish to consider this matter further.</p>	<p>The HRA submitted as part of the Application (APP-134) considers the assessment of effects at Ashdown Forest.</p> <p>The HRA assessment takes into account NO_x concentrations, nitrogen deposition and acid deposition with respect to changes in air quality during operation of the Project.</p> <p>Agreement has been reached with Natural England on the method used for the HRA assessment and Natural England's Relevant Representations detail that no further information is required with regard to the HRA assessment.</p>	<p>ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 [APP-134]</p> <p>ES Appendix 9.9.1 Habitats Regulation Assessment Parts 2 [APP-135]</p>	Under discussion
2.2.3.3	Air quality assessment	<p>Further information is required on receptor locations and results to be able to link scenarios and results to specific receptor locations. For example, the air quality assessment notes the potential for likely significant affects at receptors in the Ashdown Forest SPA/SAC; however, ESCC do not have information on the location of the receptors or the size of the impact.</p> <p>Updated position (Deadline 1): Better presentation of the data would be appreciated here – at present, finding the modelled impact on any particular site involves mapping the list of receptors then looking up the results in multiple documents. This is raised (and addressed) in row 2.47.</p>	<p>All modelled sensitive receptors are presented in the ES Appendix 13.6.2 and associated figures. Table 2.1.1 presents human receptor locations and Table 2.4.1 presents ecological receptor locations. Results at sensitive receptors are presented in the results appendices.</p> <p>The HRA submitted as part of the Application considers the assessment of effects at Ashdown Forest.</p> <p>Figures presented as part of the HRA assessment show changes in NO_x, NH₃ and nitrogen deposition compared to the critical load and level.</p>	<p>ES Appendix 13.6.2 Air Quality Receptors [APP-160]</p> <p>ES Appendix 13.9.1 Air Quality Results Tables and Figures Part 1 [APP-162]</p> <p>ES Appendix 13.9.1 Air Quality Results Tables and Figures Part 2 [APP-163]</p> <p>ES Appendix 13.9.1 Air Quality Results Tables and Figures Part 3 [APP-164]</p> <p>ES Appendix 13.9.1 Air Quality Results Tables and Figures Part 4 [APP-165]</p> <p>ES Appendix 13.9.1 Air Quality Results</p>	Under discussion

				<p>Tables and Figures Part 5 [APP-166]</p> <p>ES Appendix 13.9.1 Air Quality Results Tables and Figures Part 6 [APP-167]</p> <p>ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 [APP-134]</p> <p>ES Appendix 9.9.1 Habitats Regulation Assessment Parts 2 [AP-135]</p>	
Mitigation and Compensation					
2.2.4.1	Operational monitoring should be agreed during the examination.	<p>Document 5.1, Chapter 13 Operational monitoring will be crucial to understand if measured air quality is following modelled prediction. There is no information in either the air quality chapter or the Surface Access Commitments document on how air quality data will be reviewed to check that changes are in-line with predictions, nor what measures would be taken if a significant adverse deterioration occurred.</p> <p>Updated position (Deadline 1): This does not address the issue raised – how air quality data will be reviewed and measures that would be taken if monitoring results deviated from modelled predictions.</p> <p>Whilst there are provisions to monitor air quality from GAL it is unclear what actions would be taken if greater changes in air quality occur than predicted in the ES and what air quality triggers would be used to identify this. This could be addressed as part of the AQAP that GAL committed to provide in the Air Quality TWG in December 2023.</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 DCO.</p> <p>The ES Appendix Carbon Action Plan (APP-091) 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 ES Appendix Surface Access Commitments (APP-090).</p> <p>Measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities 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>Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 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>	Under discussion

<p>2.2.4.2</p>	<p>Air quality actions are split across multiple documents. A single Air Quality Action Plan is needed</p>	<p>Document 5.1, Chapter 13 Paragraph 13.9.3 states that the operational phase mitigation measures are set out in two documents: the Carbon Action Plan and the Surface Access Commitments. This makes it difficult to identify measures that focus on air quality improvement. This approach differs from previous discussions, where a draft Air Quality Action Plan was provided in 2022.</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 is 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 and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities 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>Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 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>Under discussion</p>
<p>2.2.4.3</p>	<p>Operational reporting, mitigation and uncertainty</p>	<p>Information is needed on how sensitive predictions are to modal shift objectives, and the impact on air quality if these are not achieved.</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 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 and what air quality triggers would be used.</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>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. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The SAC also includes a section on GAL's further aspirations, which includes more ambitious mode share targets which we it 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</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Chapter 7.4 Transport Assessment [AS-079]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>Appendix F of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4)</p>	<p>Under discussion</p>

			<p>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 (APP-038) is measured against the relevant air quality standards. The draft Section 106 agreement includes commitment 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). The draft Outline AQAP will be provided to the LAs at Deadline 1 with the intention of submitting the Outline AQAP into the Examination in due course taking account of any feedback received.</p>		
2.2.4.4	Operational reporting, mitigation and uncertainty	<p>Further information is needed to understand how air quality will be monitored, evaluated, and reported to local authorities. A process is also needed to review actions in the event that air quality deviates for the worst from modelled predictions.</p> <p>Updated position (Deadline 1): Whilst there are provisions to monitor air quality from GAL it is unclear what actions would be taken if greater changes in air quality occur than predicted in the ES and what air quality triggers would be used to identify this. This could be addressed as part of the AQAP that GAL committed to provide in the Air Quality TWG in December 2023.</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>	Section 13.9 and Section 13.10 of ES Chapter 13 Air Quality [APP-038]	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 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>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>		
2.2.4.5	<p>Operational reporting, mitigation and uncertainty</p>	<p>A combined operational air quality management plan has not been prepared to draw together measures presented elsewhere with a specific focus on local air quality. Providing one would provide more clarity on the proposed package of measures.</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 is out of date.</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>Measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities to carry out their LAQM requirements.</p> <p>Updated position (Deadline 1): GAL will provide a draft AQAP to the LAs at Deadline 1 with the intention of submitting the outline version into the Examination in due course.</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>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 5.4.1: Surface Access Commitments [APP-090]</p>	<p>Under discussion</p>

Other					
2.2.5.1	Using the application documents, is not possible to relate the figures to the results set out in the appendices tables	<p>Document 13.6.2 The receptor tables include most of the expected information, including a receptor ID reference. However, the tables (e.g. Table 2.1.1 and Table 2.4.1) do not identify which figure the receptor listed is shown, as would be typically expected, to allow readers to move between the appendix, chapter and figures. However, as receptors are not labelled by ID this is therefore not possible in this ES. The reader needs to plot the grid references provided to understand where a receptor is.</p> <p>Updated position (Deadline 1): It is welcomed that GAL propose to provide further information.</p>	<p>It is proposed that results tables are provided to the local authority to set out the requested information.</p> <p>Updated position (Deadline 1): The updated receptor tables have been provided at Deadline 1, contained in Appendix B of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p>	<p>Appendix B of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</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					
2.4.1.1	BEIS 2023 GHG intensity factors are not used as a data source for the Future Baseline.	<p>Document 16.9.2 (table 3.2.1)</p> <p>For the Green Book Supplementary Guidance, BEIS (2023) emission factors are used, contradicting the BEIS (2022) GHG intensity factors stated in Table 3.2.1.</p> <p>Updated position (Deadline 1): The response provided by GAL is satisfactory.</p>	<p>It is assumed that this is referring to Document 5.3 Table 3.2.1. This states that</p> <ul style="list-style-type: none"> - conversion factors for future baseline emissions are based on BEIS 2022 factors; and - future grid electricity is based on BEIS 2023 Green Book Supplementary Guidance for valuation of energy use and greenhouse gas emissions. <p>The Green Book Supplementary Guidance document differs from the main emissions factor dataset frequently used for GHG accounting. It is used as it provides an indication of the likely rate of future grid decarbonisation. The 2023 version of the Green Book Supplementary Guidance was used as it provided the most up-to-date dataset on likely future grid decarbonisation.</p> <p>Carbon factors (for converting consumption to GHG emissions) were taken from the Corporate Accounting dataset produced by BEIS for 2022.</p> <p>Table 15.8.5 and 15.8.6 are contained within ES Chapter 15 and do not make reference to BEIS carbon factors.</p>	Tables 15.8.5 and 15.8.6 of ES Chapter 15 Climate Change [APP-040]	Agreed
Assessment Methodology					
<i>There are no matters relevant to the assessment methodology for this topic in this Statement of Common Ground.</i>					
Assessment					
2.4.3.1	Inconsistency and lack of detail in some climate impact statements.	<p>Document 5.1 (tables 15.8.5 and 15.8.6)</p> <p>The climate impact statements (detailed in Table 15.8.5 and Table 15.8.6) are lacking in consistency in the way they are articulated in that some are missing an 'impact.' They have a cause e.g. 'increased flooding' and an 'event' e.g. flooding of electrical equipment' but no end 'impact' e.g. resulting in increased maintenance requirements OR resulting in operational downtime. This result is what should determine the consequence rating and the approach taken could have led to an underestimation of risk.</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) (APP-040) 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) (APP-187) within Table 2.1.1 in the 'Climate Change Impact' column. 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

		<p>Updated position (Deadline 1): There is a lack of consistency in the way there are articulated. Whilst we agree that risk ratings would not change, a consistent approach is good practice and necessary to fully understand the potential impacts.</p> <p>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 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>			
Mitigation and Compensation					
2.4.4.1	Mitigation measures are needed to reduce the impact of Urban Heat Island (UHI) effect.	<p>Document 15.5.2</p> <p>The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.</p> <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>This statement in Paragraph 3.2.3 of Appendix 15.5.2 (APP-186) 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' (APP-186). It 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.</p> <p>It is noted in Paragraph 3.3.2 of Appendix 15.5.2: Urban Heat Island Assessment (APP-186) that the risks associated with the UHI effect (which were assessed as medium) should be monitored.</p>	<p>Paragraph 3.2.3, Paragraph 3.3.2 and Section 3.3 of Appendix 15.5.2 Urban Heat Island Assessment [APP-186]</p>	Agreed
2.4.4.2	Climate change (impacts)	<p>Additional mitigation / adaptation measures need to be considered as part of the Climate Change Resilience Assessment and the Urban Heat Island Assessment. Climate scenarios contain uncertainty in both emissions scenarios and the modelling process itself. Therefore, whilst the assessment does not raise any 'significant' climate risks, it should identify further measures that can increase asset resilience in the design, construction and operational phases.</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>However, greater consideration of uncertainty would be welcomed, as would a section drawing together planning and possible mitigation measures – at present these are presented across multiple documents.</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) (APP-082) includes an overview of relevant mitigation measures. This document is referenced within Chapter 15 of the ES (Climate Change) (APP-040). 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 (APP-257) 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>Appendix 5.3.2 The 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

			<p>An additional 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 Chapter 15 of the ES (Climate Change).</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
<i>There are no matters relating to Construction in this Statement of Common Ground.</i>					

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
<i>There are no issues relating to Cumulative Effects and Interrelationships within this Statement of Common Ground.</i>					

2.7. Draft DCO and Explanatory Memorandum

2.7.1 Table 2.7 sets out the position of both parties in relation to DCO Draft 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
<i>There are no matters relating to the Draft DCO and Explanatory Memorandum in this Statement of Common Ground.</i>					

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					
There are no matters relevant to the baseline for this topic in this Statement of Common Ground.					
Assessment Methodology					
There are no matters relevant to the assessment methodology for this topic in this Statement of Common Ground.					
Assessment					
2.8.3.1	Biodiversity net gain impacts	The wider biodiversity net gain impacts on environmental designated areas in the county, such as the Ashdown Forest, need to be considered. Updated position (Deadline 1): Need for ESCC to consider and assess this further.	The impact of the Project on designated areas such as Ashdown Forest are considered within ES Chapter 9 Ecology and ES Appendix 9.9.1 Habitats Regulations Assessment Report.	ES Chapter 9 Ecology and Nature Conservation [APP-034] ES Appendix 9.9.1 Habitat Regulations Assessment Report Part 1 [APP-134]	Under discussion
Mitigation and Compensation					
There are no matters relevant to mitigation and compensation for this topic in this Statement of Common Ground.					
Other					
There are no other matters relevant to this topic in this Statement of Common Ground.					

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 within 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					
<i>There are no issues relating to the baseline in this Statement of Common Ground.</i>					
Assessment Methodology					
2.11.2.1	Carbon calculations do not include well to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the Environmental Statement methodology.	<p>Document 16.9.1 (table 2.1.1), 16.9.2 (table 2.1.1) and 16.9.4</p> <p>Not accounting for WTT is noncompliant with the globally recognised GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology in Section 16.4.18, where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology referenced under Section 16.4.24, which states “GHG factors are drawn from a range of national and international sources. Where these factors are expected to change over the duration of the Project then a time-based factor is used, based on estimating the extent and rate at which the factor will change. This estimation process draws on industry standards, industry-specific guidance, and a range of other UK and government policy and strategy documents.” Additionally, the approach taken goes against the UK Government’s carbon accounting methodology from BEIS (2022)¹, which recommends that “Well-to-tank (WTT) fuels conversion factors should be used to account for the upstream Scope 3 emissions associated with extraction, refining and transportation of the raw fuel sources to an organisation’s site (or asset), prior to combustion.” WTT emissions represent a significant portion of fuel emissions (around 20%) and need to be accounted for.</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 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
2.11.2.2	It is not clear how or if GAL converted CO2 emissions from aircraft to CO2e.	<p>Document 16.9.4, section 1.2.3</p> <p>This states that “The estimation of GHG emissions arising from aircraft is based on estimating fuel consumption for each of the four use categories, and then using an appropriate CO2 emissions factor per unit of fuel to</p>	<p>The modelling process estimated fuel consumption from aviation, and that 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).</p>	n/a	Agreed

		model total CO2e emissions". It is not clear if a conversion was undertaken from CO2 to CO2e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) ¹ . Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO2e in 2028 in the most carbon-intensive year where 5.327 MtCO2e was estimated to be released (Table 5.2.1)			
2.11.2.3	It is not clear if construction electrical energy consumption emissions were considered in the ES	<p>Document 16.9.1</p> <p>Calculations or an estimate on electrical energy use during construction should be calculated as part of the construction GHG Assessment. Without this, the energy-related emissions in the ES for construction are potentially underreported.</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>	Electricity has not specifically been modelled within the construction assessment - which has focused on energy use in the form of diesel-fuelled vehicles. While it is reasonable to expect some electricity use on-site during construction for site accommodation this is expected to be minor in scale relative to other emissions sources. At this stage the assessment has sought to adopt a conservative approach on energy use during construction by assuming all plant is diesel-powered. In practice it is likely that some construction activities will be undertaken using electric plant, potentially powered through a green power tariff or equivalent, that would result in lower emissions than from diesel-powered plant.	n/a	Not Agreed
2.11.2.4	Carbon emissions	<p>Assessment of carbon impacts:</p> <ul style="list-style-type: none"> The environmental statement does not calculate well-to-tank emissions (WtT), which is noncompliant with the globally recognised GHG Protocol Corporate Accounting Standard and goes against the UK Government's carbon accounting methodology (BEIS, 2022). Using WtT emissions methodology would raise GHG emissions associated with aviation by approximately 20.77%. It is not clear if a conversion was undertaken from CO2 to CO2e for aviation emissions, which would result in a 0.91% increase in all aviation emissions (BEIS, 2023). This needs to be clarified. Further clarity is required on whether embodied carbon from construction materials has been considered in the assessment. <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</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</p>	Table 5.3.1 of ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions [APP-191]	Not Agreed

		transparency. This acknowledgment aligns with one of the key principles of GHG accounting.	across the assessment methodology it has also been removed from other aspects of the GHG assessment. The modelling process estimated fuel consumption from aviation, and that this was then converted to estimated tCO _{2e} using the appropriate conversion factor. All aviation emissions within the ES are reported to reflect tonnes of carbon dioxide equivalent (tCO _{2e}).		
Assessment					
There are no issues relating to the baseline in this Statement of Common Ground.					
Mitigation and Compensation					
2.11.4.1	GAL does not identify the risks associated with using carbon offset schemes.	Document 5.4.2, Section 1.14 This states that, "In 2016/17, we achieved 'Level 3+ - Neutrality' status under the Airport Carbon Accreditation scheme, which is a global carbon management certification programme for airports (Ref 1.1). GAL has been working hard to reduce carbon emissions under GAL's control (from a 1990 baseline) and offset the remaining emissions using internationally recognised offset schemes." The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme. Updated position (Deadline 1): The response does not address the concerns raised. GAL should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.	The Carbon Action Plan commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. It is entirely appropriate within this framework to consider the use of a range of market mechanisms at such stages are as appropriate - and this includes the use of REGOs as part of this. The Carbon Action Plan notes GAL's commitments to use internationally recognised offsetting schemes (CAP Para 1.1.4). Within the CAP GAL also commits to investment in carbon removal mechanisms in preference to commonly used offsetting mechanisms.	ES Appendix 5.4.2 Carbon Action Plan [APP-091]	Not Agreed
2.11.4.2	GAL indicates it is relying upon Renewable Energy Guarantees of Origin ("REGO") to achieve its Net Zero and Zero Carbon commitments. However, purchasing REGO certificates does not necessarily reduce emissions from grid electricity consumption to zero.	Document 5.4.2 (section 3.1.2) This states "For emissions that occur outside the Gatwick Airport site boundary where GAL can make an impact, we have already taken action, such as electing to purchase 100% Renewable Energy Guarantees of Origin ("REGO") electricity since 2013 and installing 22 charging points for airport ground operation vehicles in 2019 (Ref. 1.6)." The guidelines for the UK Government Streamlined Energy and Carbon Reporting (SECR) advise, "Where organisations have entered into contractual arrangements for renewable electricity, e.g. through Power Purchase Agreements or the separate purchase of Renewable Energy Guarantees of Origin (REGOs), or consumed renewable heat or transport certified through a Government Scheme and wish to reflect a reduced emission figure based on its purchase, this can be presented in the relevant report using a "market-based" reporting approach. It is	The Carbon Action Plan commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. It is entirely appropriate within this framework to consider the use of a range of market mechanisms at such stages are as appropriate - and this includes the use of REGOs as part of this. The Carbon Action Plan notes GAL's commitments to use internationally recognised offsetting schemes (CAP Para 1.1.4). Within the CAP GAL also commits to investment in carbon removal mechanisms in preference to commonly used offsetting mechanisms.	ES Appendix 5.4.2 Carbon Action Plan [APP-091]	Not Agreed

		<p>recommended that this is presented alongside the "location based" grid-average figures and in doing so, you should also look to specify whether the renewable energy is additional, subsidised and supplied directly, including on-site generation, or through a third party."</p> <p>Updated position (Deadline 1): The response does not address the concerns raised and the guidance quoted.</p> <p>Aligned with SECR, GAL's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for REGOs. This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.</p>			
<p>2.11.4.3</p>	<p>Use of offsets and off-site renewable generation</p>	<p>Use of offsets and off-site renewable generation, including the following three points.</p> <ul style="list-style-type: none"> The environmental statement suggests reliance upon Renewable Energy Guarantees of Origin (REGO) certificates to achieve net zero emissions. REGOs do not guarantee that additional renewable generation will be brought online to match demand. Guidance in the UK Government's Streamlined Energy and Carbon Reporting (SECR) should be followed to accurately report emissions from electricity consumption. The Environmental Statement describes use of carbon offsets. Various risks have been identified by the scientific community around offsetting schemes. GAL should specifically state which offset scheme they intend to use so research can be conducted into the robustness of the scheme. The Environmental Statement assumes that the Government's Jet Zero Strategy will ensure aircraft emissions remain compatible with the UK's net-zero targets. Recent developments call this assumption into question, most notably advice from the Climate Change Committee in their 6th Budget Report. Further sensitivity analysis should be undertaken, exploring scenarios where uptake of Sustainable Aviation Fuels and electric aviation take place at slower rates or, in the latter case, fail to achieve commercial uptake. <p>Updated position (Deadline 1): Aligned with SECR, GAL's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for REGOs. This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.</p> <p>GAL should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.</p>	<p>The Carbon Action Plan commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. It is entirely appropriate within this framework to consider the use of a range of market mechanisms at such stages are as appropriate - and this includes the use of REGOs as part of this. The Carbon Action Plan notes GAL's commitments to use internationally recognised offsetting schemes (CAP Para 1.1.4). Within the CAP GAL also commits to investment in carbon removal mechanisms in preference to commonly used offsetting mechanisms.</p> <p>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:</p> <p><i>"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 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</p>	<p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p>	<p>Under Discussion</p>

			including the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.		
Other					
2.11.5.1	Failure to consider risks raised by the Climate Change Committee, which warns that the UK Jet Zero policy is non-compliant with the UK's net zero trajectory, and the cumulative effects of airport expansion plans.	<p>Document 5.1, Chapter 16 Section 16.12.3 states, "Given the overarching contribution to emissions arise from aviation, and the policy context in the UK the reflects the Jet Zero Strategy (Department for Transport, 2022), it is concluded that the overall impacts arising from the Project are not so significant that the Project would have a material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets. On this basis the overall assessment concludes that the Project has a Minor Adverse Not Significant impact." This is not a safe assumption to make, for two reasons.</p> <p>First, modelling for Jet Zero did not include all current UK airport expansion plans, most notably additional runways at both Heathrow and GAL. The assumptions on airport capacity used to inform the modelling are therefore out of date.</p> <p>Second, the Government's advisory body for climate change, the Climate Change Committee (CCC), issued concerns around airport expansion as part of their 6th budget report (June 2023). Specifically, they stated that:</p> <ul style="list-style-type: none"> The Jet Zero strategy had a "Reliance on nascent technology. The Jet Zero Strategy approach is high risk due to its reliance on nascent technology – especially rapid SAF uptake and aircraft efficiency savings – over the period up to the Sixth Carbon Budget. The Government does not have a policy framework in place to ensure that emissions reductions in the aviation sector occur if these technologies are not delivered on time and at sufficient scale. They have concerns around "Airport expansion. The Committee's Sixth Carbon Budget Advice recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions.3 Since making this recommendation the Committee has noted that airports across the UK have increased their capacities and continue to develop capacity expansion proposals. This is incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate this additional demand. No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects. 	<p>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:</p> <p>"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 review will be in 2027, five years after publication of the Strategy in 2022.</p> <p>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.</p> <p>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."</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> <p>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'."</p>	n/a	Agreed

		<p>Given these factors, the ES has not complied with the IEMA (2022) GHG Assessment significance guidance and has come to the wrong conclusion. In alignment with the IEMA (2022) GHG Assessment significance guidance, the Project should be considered Major Adverse, which is defined as "the Project's GHG impacts are not mitigated or are only compliant with do-minimum standards set through regulation, and do not provide further reductions required by existing local and national policy for projects of this type. A project with major adverse effects is locking in emissions and does not make a meaningful contribution to the UK's trajectory towards net zero."</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>The UK Government response does not represent the UK-wide capacity management framework suggested by the CCC. ESCC agrees with the CCC's view that Jet-Zero's reliance on nascent technology unproven at scale remains fundamentally unsafe.</p>			
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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	Health Impact Assessment	<p>A Health Impact Assessment should outline population health impacts for East Sussex and appropriate mitigation proposed and provided to protect population health and any impact on local services and infrastructure.</p> <p>Updated position (Deadline 1): Acknowledging that there is not a statutory duty on the applicant to undertake a specific HIA. However, in the case of this project, given the size, length of construction, proximity to communities and far reaching disruption as well as ongoing operational increase in activity on completion we would strongly recommend an HIA be carried out for East Sussex and each affected LA area. This would ensure that the local health impacts for each area can be clearly identified and communicated. Without independent HIA's it is not possible to understand the health impacts on each of the populations. The health impacts will vary greatly across the authority areas, and so it is important that this is made clear and presented transparently rather than integrated within the existing environmental statement chapter.</p>	ES Chapter 18: Health and Wellbeing sets out the study areas in Section 18.4, paragraph 18.4.8. East Sussex is part of the 'Six Authorities Area'. These are local level effects that are summarised at paragraph 18.11.9, with measures to reduced adverse impacts and increase beneficial effects discussed in the respective sections of section 18.8 that deal with each of these determinants of health.	ES Chapter 18: Health and Wellbeing [APP-043]	Under discussion
Assessment					
<i>There are no issues relating to the assessment for this topic within this Statement of Common Ground.</i>					
Mitigation and Compensation					
2.12.4.1	Noise and vibration impacts on local communities	<p>The noise and vibration impacts on health and well-being of local communities need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups within this, that may be more affected by the impacts of noise (and vibrations).</p> <p>Updated position (Deadline 1): See response to 2.16. Need for ESCC to consider further before providing a response.</p>	ES Chapter 18: Health and Wellbeing sets out the assessment of noise and vibration effects in Section 18.8, paragraph 18.8.91 to 18.8.226. The health assessment is informed by ES Chapter 14: Noise and Vibration. The ES Chapter 18 assessment specifically considers noise and vibration effects to vulnerable groups. ES Chapter 18, Table 18.7.1: Mitigation and Enhancement Measures explains that measures have specifically been included to promote health equity by supporting uptake of the Noise Insulation Scheme for local vulnerable groups. The Noise Insulation Scheme (NIS) is set out in ES Appendix 14.9.10, and paragraph 4.1.15 discusses the specific measures to support vulnerable groups.	<p>ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>ES Chapter 14: Noise and Vibration [APP-039]</p> <p>ES Appendix 14.9.10 Noise Insulation Scheme [APP-180]</p>	Not agreed
Other					
<i>There are no other issues relating to this topic within this Statement of Common Ground</i>					

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
<i>There are no issues relating to Historic Environment within this Statement of Common Ground.</i>					

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 other issues relating to the baseline in this Statement of Common Ground.					
Assessment Methodology					
There are no other issues relating to the assessment methodology in this Statement of Common Ground.					
Assessment					
2.14.3.1	Dark skies policy	<p>Clarification is required on how the proposal aligns with dark skies policy outlined in local protected landscape strategies e.g. High Weald, South Downs National Park.</p> <p>Updated position (Deadline 1): Need for ESCC to consider further before providing a response.</p>	<p>No new flight paths are proposed. The High Weald Area of Outstanding Natural Beauty Management Plan 2019 – 2024 includes Objective OQ4: <i>‘To protect and promote the perceptual qualities...dark skies.</i> ES Chapter 8 includes an assessment of effects on the High Weald AONB special qualities including the perceptual qualities of dark skies. The increase in overflights at up to 7,000 feet, compared to the future baseline scenario in 2032, is estimated to be up to approximately 20% during daytime and up to 10% during nighttime, which is considered to result in minor adverse effects (see Table 8.8.1). Whilst an adverse effect on the perception of dark skies is identified it is not considered to constitute significant harm to this perceptual quality. ES Chapter 8 considers the influence that a slight intensification of the massing of built form and concentration of lighting visible at night within the predominantly urban townscape of the airport within the setting of the High Weald AONB would result in Minor adverse effects. South Downs Local Plan 2014 to 2033 includes Objective 1: <i>‘To conserve and enhance the landscapes of the National Park’</i> and Strategic Policy SD8: <i>Dark Night Skies.</i> Any increase in lighting at Gatwick Airport would not affect the SDNP due to lack of intervisibility. The only possible effect on the perception of dark night skies is due to visible lights on overflying aircraft in clear weather conditions. The increase in overflying aircraft at less than 7000 ft above local ground level would range from 6% to 16% which equates to between 0.2 and 1.8 aircraft a day which is considered to result in minor adverse effects (see Table 8.8.1). Approximately half of the aircraft which currently overfly the SDNP are non-Gatwick. Whilst an adverse effect on the perception of dark night skies is identified it is not considered to constitute significant harm to this perceptual quality.</p>	Section 8.9 and Table 8.8.1 of ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]	Under discussion
Mitigation and Compensation					
There are no other issues relating to mitigation and compensation in this Statement of Common Ground.					
Other					

There are no other issues relating to topic in this Statement of Common Ground.

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>					

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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					
2.16.1.1	Only 2032 assessment year is assessed as a worst-case	The assessment of air noise only covers 2032 as it is identified as the worst-case. Updated position (Deadline 1): All assessment years (2029, 2032, 2038 and 2047) should be covered in the assessment to understand temporal effects on the local population	The noise modelling method is summarised in Section 2 of Appendix 14.9.2 and was explained in a CAA ERCD presentation and slide deck hand out to the TWG on 7th June 2022. GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios modelled and reported in the ES. These comprise: <ul style="list-style-type: none"> 8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, Lmax and overflights; 5 assessment years – 2019, 2029, 2032, 2038 and 2047 2 Fleet transition scenarios, the Central Case and Slower Transition Case. <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>	ES Noise and Vibration Figures Part 1 [APP-063] ES Noise and Vibration Figures Part 2 [APP-064] ES Noise and Vibration Figures Part 3 [APP-065] ES Appendix 14.9.2: Air Noise Modelling [APP-172]	Not agreed
2.16.1.2	Assurances that areas of East Sussex below 7,000 feet have been included in the air noise modelling work	Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level.	The ES provides a full assessment of air noise across East Sussex.	ES Chapter 14 Noise and Vibration [APP-039]	Agreed
2.16.1.3	No details on the 92-day summer average aircraft fleet for each scenario are provided	It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets.	Tables of aircraft movements by aircraft type for each noise assessment case (ie year, metric, fleet) will be provided to the TWG.	n/a	Under discussion
Assessment Methodology					
2.16.2.1	Clarification on estimated overflight mapping	There is a need for assurances on the accuracy and reliability of the estimated overflight mapping, and we will require East Sussex to be included as part of this. Updated position (Deadline 1): Overflight maps are only provided for 2019 and are too coarse to draw any meaningful information from them.	Overflight mapping over the area Gatwick aircraft overfly below 7,000 at least once every 24 hours on an average summer day/night. This includes parts of East Sussex. The methodology is described in AS Appendix 14.9.2 and follows CAA guidance.	n/a	Not agreed

<p>2.16.2.2</p>	<p>No assessment criteria is provided for the assessment of effects on non-residential receptors</p>	<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 buildings, sensitivity to noise tends to depend not just on the building use, but also its construction and other factors. Therefore, where noise levels 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</p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p>	<p>Not agreed</p>
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			<p>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>		
2.16.2.3	The assessment switches between discussing properties and population depending on whether noise is between LOAEL and SOAEL (population) or above SOAEL (properties)	<p>The assessment should cover both properties and population and be consistent when identifying significant effects to aid their understanding.</p> <p>Updated position (Deadline 1): The ES should contain information on both properties and population</p>	<p>When considering the wider effects populations are estimated, for example with air noise where up to say 28,000 people may be exposed, to the nearest 100 from postcode databases. Where smaller number are affected and individual properties are counted the numbers of properties are reported to give more detail.</p>	n/a	Not agreed
2.16.2.4	No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	<p>Context is provided to the assessment of ground noise through consideration of the secondary L_{Amax}, overflight, L_{den} and L_{night} noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.</p> <p>Updated position (Deadline 1): Supplementary noise metrics should be used supplement the primary metric assessment to identify likely significant effects.</p>	<p>Paragraph 14.4.79 of the ES explains: 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.</p>	Para 14.4.79 of ES Chapter 14: Noise and Vibration [APP-039]	Not agreed
2.16.2.5	No details of the noise modelling or validation process 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.</p> <p>Updated position (Deadline 1): Details of the validation and noise modelling processes should be submitted along with any noise model assumptions and limitations</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 L_{max} 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</p>	ES Appendix 14.9.2 Air Noise Modelling [APP-172]	Not agreed

			other UK 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.		
2.16.2.6	No details of measured Single Event Level or LASmax noise data from the Noise-Track-Keeping are provided	<p>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): Details of the validation and noise modelling processes should be submitted along with any noise model assumptions and limitations</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 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.</p>	ES Appendix 14.9.2 Air Noise Modelling [APP-172]	Not agreed
Assessment					
2.16.3.1	Lack of detail on noise impacts for East Sussex	<p>Concerned that the impacts of noise on East Sussex communities has not been adequately addressed and assessed, and that appropriate mitigations will not be in place.</p> <p>Updated position (Deadline 1): Overflight maps are only provided for 2019 and are too coarse to draw any meaningful information from them.</p>	<p>The ES provides a full assessment of noise impacts in East Sussex.</p> <p>Since the PEIR the resolution of the Overflight modelling has been increased to allow the overflight mapping grid size to be reduced from 3km to 1km. Section 2.2 of ES Appendix 14.9.2 Air Noise Modelling explains the methodology. GAL considers the mapping of overflight numbers across East Sussex and elsewhere to give a good indication of how overflight number will change.</p> <p>Table 14.12.1 provides details of overflights changes expected at Landscape Assessment locations in East Sussex, including Ashdown Forest.</p>	ES Chapter 14 Noise and Vibration [APP-039]	Not agreed
2.16.3.2	Identification of population exposed to noise above	It is not clear what population is exposed to changes in noise above SOAEL and between LOAEL and SOAEL in Table 14.9.10 and 14.9.11.	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	Paragraphs 14.9.102 to 14.9.104 and Tables	Not agreed

	SOAEL and between LOAEL and SOAEL	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	across 9 ranges. Only noise levels above LOAEL are reported. 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. 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.	14.9.10 and 14.9.11 of ES Chapter 14 Noise and Vibration [APP-039] Section 8.1 of ES Appendix 14.9.3 Ground Noise Modelling [APP-173]	
2.16.3.3	Properties that are newly exposed to noise levels exceeding the SOAEL are not identified Paragraph 14.9.98 of the Environmental Statement Chapter 14 Noise and Vibration states that there would be reduced movements on the main runway resulting in Minor Beneficial effects	It is 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. It is not clear is these Minor Beneficial effects would continue through the project lifespan when more capacity is taken up and the main runway may return to current intensity of operations. Updated position (Deadline 1): This information should be provided in the ES so it is clear and understandable.	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.	Tables 14.9.5 and 14.9.7 of ES Chapter 14 Noise and Vibration [APP-039]	Not agreed
Mitigation and Compensation					
2.16.4.1	Capping of night flights to protect local communities	Concern that the use of the northern runway will increase the negative impacts of aircraft noise on local communities at night – impacting detrimentally on physical and mental health and wellbeing. Night flights will need to be restricted / capped, and the Northern Runway should not operate, between the hours of 23:00 and 06:00. We need assurances that there are not dispensations that GAL can routinely operate within this restricted night-time period, notwithstanding use of aircraft at night for emergencies. Updated position (Deadline 1): Paragraph 19 of Schedule 2 of the DCO [APP-008] states: “The northern runway (Work No. 1) must not be routinely used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport’s main runway at the date this Order is made) is not available for use for any reason”.	That is the intention as secured through the DCO. As at present the Northern Runway will be used at night during maintenance of the main runway.	Draft DCO (Doc Ref. 2.1)	Agreed
2.16.4.2	Slow fleet transition noise contour area limits	There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the Noise Envelope allows for an increase in noise contour area on opening of the Northern Runway. Updated position (Deadline 1): The Noise Envelope is not policy compliant.	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.	Section 3.2 of ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]	Not agreed

		<p>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.</p> <p>There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels.</p>	<p>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.</p> <p>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>.</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> <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>	<p>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [AS-023]</p> <p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	
2.16.4.3	Annual noise contour limits	Noise contour area limits relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period.	Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements.	<p>ES Appendix 14.9.7 Noise Envelope [APP-177]</p> <p>Draft DCO (Doc Ref. 2.1)</p>	Under discussion
2.16.4.4	Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	<p>GAL wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope.</p> <p>Updated position (Deadline 1): The Noise Envelope is not policy compliant.</p>	<p>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.</p> <p>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.</p>	<p>Section 3.2 of ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]</p> <p>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [AS-023]</p>	Not agreed

		<p>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.</p> <p>There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels.</p>	<p>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>.</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> <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>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	
<p>2.16.4.5</p>	<p>CAA to regulate the Noise Envelope</p>	<p>To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for local authorities to review Noise Envelope reporting, take action against breaches or review any aspects of the Noise Envelope.</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>	<p>Not agreed</p>

2.16.4.6	Adoption of an action plan	<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.</p> <p>Updated position (Deadline 1): Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</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 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>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	Not agreed
2.16.4.7	Capacity declaration restrictions as a means of managing aircraft noise	<p>This 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 sufficient to prevent potential breaches and slot restriction measures should be adopted.</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 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>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	Not agreed
2.16.4.8	Terms of Reference for Noise Envelope review	<p>The Terms of Reference for the noise envelope review should be clearly defined and include a requirement for engagement and consultation with key stakeholders as part of the review process.</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</p>	<p>ES Appendix 14.9.7: The Noise Envelope [APP-177]</p>	Not agreed

			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.		
Other					
2.16.5.1	Interpretation of the Overarching Aviation Noise Policy	<p>Paragraph 14.2.44 of the Environmental Statement Chapter 14 Noise and Vibration – sharing the benefits has been removed from the ES. This is a fundamental part of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities.</p> <p>Updated position (Deadline 1): The Noise Envelope is not policy compliant.</p> <p>The Applicant incorrectly identifies that 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.</p>	<p>Paragraph 14.2.44 of the ES 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.</p>	ES Chapter 14 Noise and Vibration [APP-039]	Not agreed
2.16.5.2	Airbus NEOs (New Engine Option) are stated to be up to 5 dB quieter departure and 3 dB quieter on approach.	<p>This statement is misleading as these levels of noise reductions are not achieved by Airbus A320Neo or A321Neo, which are the main Airbus variants that will be operational at GAL in the future.</p> <p>Updated position (Deadline 1): Page 103 [AS-023]. Details should be provided of SEL and LASmax noise measurements at each monitoring location used in the air noise model validation so the noise benefits of new aircraft can be understood.</p>	Please clarify where this statement is made. The ERCD ANCON model is based on measured in-service noise levels not those stated in publications of measured during certification.	n/a	Under discussion

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
<i>There are no issues relating to Planning and Policy in this Statement of Common Ground.</i>					

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	Legal agreement	ESCC wants to be party to legal agreement to secure required and appropriate mitigation should the project be approved.	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
2.18.1.2	Second runway	ESCC wants assurances that should a second runway option come forward in the future, that the use of the northern runway for departures would cease to operate.	<p>As set out in GAL’s representations to the CBC 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>Appendix 2 of GAL’s representations dated 3rd November 2023 to the Planning Inspectors’ Matter Issues and Questions on the Crawley Borough Council Local Plan Examination sets out an overview of relevant national and local policy, guidance and documents relating to the need to continue to safeguard land at Gatwick Airport for a new runway. There is a clear and longstanding policy commitment which is supported by Government to safeguard land at airports to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth. Indeed, it is a policy that Crawley BC have themselves adopted and recognised in full within the current and previous versions of their Local Plan, and which were found to be sound.</p>	n/a	Under discussion

2.19. Socio-Economics and Economics

2.19.1 Table 2.18 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					
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					
2.19.3.1	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	The methodology used to assess the Catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.	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. 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).	ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200]. Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].	Under discussion
2.19.3.2	Concern over lack of consideration of economic impacts on East Sussex	It is unclear what the economic impacts of the NRP on East Sussex would be.	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	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198]	Under discussion

			<p>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>Jobs cannot be ring-fenced for residents of any particular area. However, the ESBS can and will be spatially targeted to provide residents with increased ability to access jobs.</p> <p>Through the ESBS, GAL will work with a range of partners including skills and training providers.</p>		
2.19.3.3	Economy	GAL must set out the economic impacts of the project.	<p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme. 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>	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251] .	
Mitigation and Compensation					
2.19.4.1	Concern over lack of consideration of economic impacts on East Sussex	Need for reassurances that the subcontractors are delivering social value and working to the appropriate benchmark and procurement frameworks.	<p>Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value). The ESBS also proposes engagement with schools and Careers Hubs.</p>	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198] .	Agreed
2.19.4.2	Concern over lack of consideration of economic impacts on East Sussex	The Employment Skills and Business Strategy (ESBS) should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.	The ESBS includes specific engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198] .	Agreed
2.19.4.3	Concern over lack of consideration of economic impacts on East Sussex	In non-construction, the option should include upskilling existing workforce which includes residents of East Sussex.	The precise measures under the ESBS will be developed in partnership with local authority partners and could include upskilling the existing workforce.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198]	Under discussion
2.19.4.4	Concern over lack of consideration of economic impacts on East Sussex	There is a need to ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.	<p>Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value). The ESBS also proposes engagement with schools and Careers Hubs.</p>	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198] .	Agreed

2.19.4.5	Concern over lack of consideration of economic impacts on East Sussex	GAL should develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should develop (not just promote) international trade opportunities with destinations aligned to LGW's route network.	Inward investment is one of the elements set out in the ESBS.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Under discussion
2.19.4.6	Economy	There is a need to better understand the employment and skills offer arising from the project. ESCC would expect a substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that GAL would work with local training providers and colleges in East Sussex to ensure that training, pathways and career opportunities are offered. Updated position (Deadline 1): The response does not adequately address employment/ apprenticeship opportunities.	The ESBS includes specific engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Not agreed
2.19.4.7	Economy	GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors should offer recruitment offers, apprenticeships and upskilling of staff). Updated position (Deadline 1): The response does not adequately address employment/ apprenticeship opportunities.	Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value). The ESBS also proposes engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Not agreed
2.19.4.8	Economy	Sub-contractors should work to the Construction Industry Training Board (CITB) national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement.	This is planned as part of the ESBS	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Agreed
2.19.4.9	Economy	The Employment Skills and Business Strategy ("ESBS") should include links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.	The ESBS includes specific engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Agreed
2.19.4.10	Economy	In non-construction, the option should include upskilling the existing workforce, including residents of East Sussex.	The precise measures under the ESBS will be developed in partnership with local authority partners and could include upskilling the existing workforce.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Under discussion
2.19.4.11	Economy	There is a need for GAL to ensure that SMEs and subcontractors include social value measures in their contracts with GAL that are consistent with those in GAL's ESBS, and that work is undertaken with local authority Careers Hubs to engage with schools.	Through the ESBS and its Implementation Plans, GAL will ensure that its contractors and sub-contractors contribute to the delivery of the agreed ESBS objectives (including Social Value). The ESBS also proposes engagement with schools and Careers Hubs.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Agreed
2.19.4.12	Economy	GAL should develop an Inward Investment Service and Strategy, working in partnership with Sussex Chamber of Commerce and other partners which includes the delivery of initiatives that develop (not just promote)	Inward investment is one of the elements set out in the ESBS.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198].	Under discussion

		international trade opportunities with destinations aligned to Gatwick's route network.			
2.19.4.13	Economy	GAL should continue to sponsor events and fund community-related projects in local communities affected by the Airport.	GAL is proposing a new community fund secured through the S106 Agreement (subject to discussions with the Local Authorities, ahead of submission at Deadline 2).	n/a	Under discussion
2.19.4.14	Economy	GAL should ensure there a sustained promotion of East Sussex at the airport to support the visitor economy.	Promoting tourism is covered in the ESBS.	ES Appendix 17.8.1 Employment, Skills and Business Strategy [APP-198]	Under discussion
Other					
<i>There are no other issues relevant to this topic in this Statement of Common Ground</i>					

2.20. Traffic and Transport

2.20.1 Table 2.19 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	Assessment methodology	Since emerging from the pandemic more representative transport data continues to become available and therefore this data should be used to validate that the proposed approach is robust and takes accounts of changes since the 2016 base and any travel changes due to Covid 19. The applicant should also review the latest Department for Transport (DfT) guidance TAG Unit M4, Forecasting and Uncertainty, and ensure the modelling takes account of it.	The Examining Authority has made a Procedural Decision dated 24 October 2023 to request the Applicant to provide a detailed response to look at accounting for COVID-19 in the transport modelling. This work is being undertaken for submission to the ExA in due course. Updated response (Deadline 1): The response to the ExA's Procedural Decision on accounting for Covid-19 in the transport modelling has been submitted and is available on the Project Webpage.	Accounting for Covid-19 in Transport Modelling [AS-121] and its Appendices [AS-122]	Under discussion
Assessment Methodology					
2.20.2.1	Page 36 (12-33) of the Transport Environmental Statement	Reference to East Sussex CC comment in PEIR to Extend scope of modelling to include Ashdown Forest. The Area of Detailed Modelling includes the Ashdown Forest area.	The transport modelling covers a large area which includes all roads in neighbouring Districts and Ashdown Forest, as indicated in Diagram 5.3.3 of the Transport Assessment. This is also shown in section 8.5 and Figure 44 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment which displays the Area of Detailed Modelling, Ashdown Forest in relation to the Habitats Regulation Assessment (HRA) that has been undertaken.	Chapter 5 of Transport Assessment [AS-079] Sections 8.5 and Figure 44 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	Agreed
2.20.2.2	Assessment methodology	The Traffic & Transport Chapter of the Environment Statement has been undertaken in accordance with rescinded guidance by IEMA: Guidelines for Environmental Impact Assessment of Road Traffic (1993). This was replaced in July 2023 by Environmental Assessment of Traffic and Movement. Therefore, if there are future updates to the Environmental Statement, this should be reviewed against the latest guidance and amended as necessary.	The Examining Authority has made a Procedural Decision dated 24 October 2023 to request the Applicant to provide a detailed response to the new IEMA guidance. This work is being undertaken for submission to the ExA in due course. Updated response (Deadline 1): The response to the ExA's Procedural Decision on the impact of the latest IEMA Guidance (2023) has been submitted and is available on the Project Webpage.	Technical Note: Impact of the Latest IEMA Guidance (2023) on the Assessment of Effects Related to Traffic and Transport [AS-119]	Under discussion
Assessment					
2.20.3.1	9 Public transport: rail of the Transport Assessment	The model contains all rail services in the modelled area. However, the assessment focuses on services on the North Downs Line, Arun Valley Line and Brighton Main Line.	The submission focuses on the rail corridors serving Gatwick and this analysis is presented in section 9 of the Transport Assessment and in section 11.10 and 12.9 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment.	Chapters 9 of Transport Assessment [AS-079]	Under discussion

				Sections 11.10 and 12.9 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	
2.20.3.2	Rail	It is necessary to ensure that rail infrastructure and service provision has been properly considered by GAL and Network Rail and can accommodate the increase in demand and capacity from passengers that will arise should the NRP go ahead. This must be considered alongside wider demands for rail travel.	A comprehensive assessment of the rail network and Gatwick Station has been undertaken in Chapters 9 and 10 of the Transport Assessment. The full set of rail data is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows, and further details of the station modelling are included in Transport Assessment Annex D.	5.3 Environmental Statement - Appendix 12.9.2 Rail Passenger [APP-154] 7.4 Transport Assessment Annex D - Station and Shuttle Legion Modelling Report [APP-262]	Under discussion
Mitigation and Compensation					
2.20.4.1	5.4.1: Surface Access Commitments	Whilst we support the proposals for bus service improvements between GAL Airport and East Sussex there is scope for further improvements. With there being no direct rail connections from much of East Sussex, and therefore the only option for passengers / employees to travel to the airport by private car / taxis, there must be investment into bus services to provide a public transport alternative bus service improvement. Updated position (Deadline 1): Further improvements required.	The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares. GAL will continue to engage with local bus operators about the potential to increase services in the early morning, late evening and weekends as part of regular liaison that occurs under the current ASAS, and will also be incorporated into a future ASAS for the Airport, which will reflect the commitments made in the SAC.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not agreed
2.20.4.2	Surface Access Commitments (SACs) and target mode shares	Concerns are held about the Surface Access Commitments that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these targets. Some of the concerns include: <ul style="list-style-type: none"> Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020 (Paragraph 12.6.11 ES Chapter 12 Traffic and Transport). 	Our mode share commitments within the Surface Access Commitments document represent the position we are committing to achieve, based on our modelling of mode choice and transport network operation. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which we will be working towards, but we have set the committed mode shares and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport and in the Transport Assessment are delivered.	ES Appendix 5.4.1: Surface Access Commitments [APP-090] ES Chapter 12 Traffic and Transport [AS-076] .	Under discussion

		<ul style="list-style-type: none"> Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit significant increases in car trips to and from the airport. Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable infrastructure to successfully meet some of the target modal splits. <p>Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The applicant has not assessed or considered the attractiveness of modes or how this could be increased. For example, by providing enhanced bus priority measures to provide journey time savings.</p>	<p>The commitments are expressed as percentages as this is the convention for mode shares. Our commitments will see increases in the number of people using sustainable transport modes. We are aware that our forecasts also anticipate an increase in vehicular traffic and our proposed highway works are designed to address this in the immediate vicinity. Our transport modelling reported in the Transport Assessment identifies the potential impact of that additional traffic in the wider area.</p> <p>The interventions we propose in the SACs have been included in our modelling, which provides confidence that the mode share commitments can be achieved with those interventions in place. The bus and coach service enhancements were developed with consideration of services which would be most likely to make greatest difference to mode shares.</p> <p>The further aspirations identified in the SAC document acknowledge that there may be further opportunities to enhance public transport services and we are committed to using the Sustainable Transport Fund to support measures that will help to achieve the mode share commitments. For the specific bus and coach enhancements identified in the SAC document we are committing to funding those for a minimum of five years.</p>	<p>Transport Assessment [AS-079]</p>	
2.20.4.3	General	The Mode Share Commitments, set out in the Surface Access Commitments, are not considered to be sufficiently ambitious, especially for passenger travel.	The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which we will be working towards, but we have set the committed mode shares explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport and in the Transport Assessment are delivered. Further clarification is sought as to why the commitments are not considered ambitious.	<p>Chapter 7 of Transport Assessment [AS-079]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>ES Chapter 12 Traffic and Transport [AS-076]</p>	Under discussion
2.20.4.4	General	There is insufficient mitigation proposed to encourage substantial modal shift towards sustainable travel to and from an expanded airport.	The SACs document sets out the range of interventions and funding that GAL are committed to deliver. 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>Chapter 7 of Transport Assessment [AS-079]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion

2.20.4.5	General	The focus of mitigation has been on the provision of services rather than implementing measures, within GAL's control, to increase the attractiveness of alternative modes of travel, i.e. bus priority measures to deliver journey time savings.	The strategic modelling analysis presented in the Transport Assessment indicates that journey times in East Sussex (routes 8 and 11 shown in Diagram 12.5.1 of the Transport Assessment) will not change significantly as a result of the Project. Junctions with medium and high magnitudes of impact have been reviewed in Chapter 12 of the Transport Assessment and no junctions experiencing this level of impact are identified in East Sussex. Consequently, bus priority infrastructure is not considered to be needed to mitigate the effects of the Project.	Chapter 12 of Transport Assessment [AS-079]	Under discussion
2.20.4.6	Mitigation for traffic impacts	GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport.	The transport modelling covers a large area which includes all roads in neighbouring Districts, as indicated in Diagram 5.3.3 of the Transport Assessment. A magnitude of impact assessment was undertaken across the modelled area to understand the impact of the Project on junctions and links within the model. This process is outlined in Chapters 5 and 12 of the Transport Assessment and in section 6.12 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. The assessment results are presented in Section 12.8 of Annex B of the Transport Assessment.	Chapters 5, 12 and 13 of Transport Assessment [AS-079] Sections 6.12 and 12.8 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]	Under discussion
2.20.4.7	Reduction of traffic through sensitive locations	ESCC requires measures that reduce traffic through sensitive locations near and through Ashdown Forest Special Area of Conservation (SAC) / Special Protection Area (SPA) and along the A22.	Our assessment shows that the number of additional vehicles travelling through these locations as a result of the Project would be very small, as would the percentage of total traffic flow which is airport-related traffic. There would be no significant adverse impacts arising as a result of traffic flow change related to the Project in any of these locations. Paragraphs 4.5.31 and 4.5.42 of the Habitat Regulations Assessment Report (ES Appendix 9.9.1) states that changes in AADT in 2032 and 2038, respectively, are low with no changes in NOx, NH3 or nitrogen deposition >1% of the relevant critical load/level predicted. Therefore effects from emissions to air from changes in traffic flow arising from the Project alone are screened out as not having a significant effect. Project in-combination with other plans / projects assessment is contained in Section 5.3. On Ashdown Forest SAC / SPA, paragraph 5.3.18 states no adverse effect on the integrity of either the SAC or SPA is predicted due to the Project in combination with other plans/projects.	ES Appendix 9.9.1 Habitat Regulations Assessment Report - Part 1 [APP-134]	Under discussion
2.20.4.8	Bus/Coach service between Gatwick and Uckfield	The proposed new coach route to/from the airport to Uckfield would only have a 2 hourly frequency off-peak, though hourly at peak time. ESCC requests an hourly service at all operational times. Updated position (Deadline 1): Request remains that the service is hourly throughout the day and not just at peaks.	The intervention included in the modelling work is an express bus or coach service between Uckfield – East Grinstead – Gatwick (hourly in peaks, two-hourly at other times).	Chapter 7 of Transport Assessment [AS-079]	Not agreed

2.20.4.9	Bus/Coach service between Gatwick and Uckfield	<p>GAL should consider extending the proposed Uckfield to Gatwick service to Heathfield. It is important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield (which ESCC proposes to increase from 2 hourly to hourly).</p> <p>Updated position (Deadline 1): Request remains that the service is extended to Heathfield.</p> <p>Explanation of 'equivalent level of public transport accessibility' required.</p>	The Surface Access Commitments document sets out the proposed bus and coach routes, and how these, or others which result in an equivalent level of public transport accessibility, would be implemented and funded.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not agreed
2.20.4.10	Bus/Coach service between Gatwick and Uckfield	There needs to be an integrated approach to public transport provision as there is an ESCC funded local bus service running parallel to the proposed coach route for the greater part of the route, between Uckfield and East Grinstead (this is currently the 2 hourly Monday to Friday daytime only route 261).	This is noted and we would welcome discussion with you on future bus and coach routes. The routes and frequencies quoted in the Application documents are those which have been included in the strategic model.	Chapter 7 of Transport Assessment [AS-079]	Under discussion
2.20.4.11	Bus/Coach service between Gatwick and Uckfield	<p>ESCC recommend extending the 261 route beyond East Grinstead to provide a direct service between Uckfield and Gatwick Airport. ESCC wish to see the operational hours of the service extended to include early mornings, evenings and weekends. We would require GAL to fund this.</p> <p>Updated position (Deadline 1): Request remains that the hours of operation of the service are extended to provide include early mornings, evenings and weekends.</p>	The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work, which will support achievement of the mode share commitments. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares. 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.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not agreed
2.20.4.12	Crowborough – Gatwick service	<p>ESCC consider there is scope for a Gatwick to Crowborough service which could run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick. We would require GAL to liaise with the appropriate operator to agree and fund this.</p> <p>Updated position (Deadline 1): Request remains that the possible provision of a direct bus service to Crowborough which could run via Forest Row and East Grinstead is explored.</p>	The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work, which will support achievement of the mode share commitments. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares. 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.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not agreed
2.20.4.13	Demand Responsive Transport	ESCC considers any new services with Demand Responsive Transport (DRT) in mind should: o be wholly integrated with conventional public transport (i.e. integrated ticketing and service design). To complement existing bus services, i.e. only run at times/to places when conventional bus services are not available; and o where feasible, feed into conventional services (i.e. first mile/last mile principles). This requires a high level of integration, service reliability, public information, waiting facilities and ticketing. o in the context of Gatwick, ESCC envisages DRT in East Sussex potentially feeding the proposed Uckfield and	<p>The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility. The Project is not proposing any Demand Responsive Transport services</p> <p>The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares.</p>	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Not agreed

		<p>Crowborough bus/coach links using the above principles, with the appropriate interchange hub facilities, rather than running all the way to/from the Airport.</p> <p>Updated position (Deadline 1): Request remains that any new services with Demand Responsive Transport service should be integrated with conventional public transport and complement existing conventional bus services.</p>			
Other					
2.20.5.1	General	<p>If the application is approved, there will be a need for the timely delivery of supporting infrastructure i.e. in advance of the northern runway being in full operation</p>	<p>The assessment indicates that completion of the highway works by three years after dual runway operations commence is appropriate in order to provide sufficient capacity for traffic generated by the Project, based on the air passenger forecasts used in the assessment, and that the highway works are not required until that date.</p>	<p>Chapters 12 and 13 of Transport Assessment [AS-079]</p>	Under discussion
2.20.5.2	Other	<p>GAL should engage with Metrobus or the appropriate operator, as they run bus services in the Forest Row, East Grinstead, Crawley and Gatwick areas.</p> <p>Updated position (Deadline 1): We would like to know the outcome of this discussion and how they have been incorporated into the proposed bus service provision.</p>	<p>GAL has held discussions with Metrobus in relation to the bus network proposals which form part of the Surface Access Commitments as part of the Project.</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion
2.20.5.3	Other	<p>There is a need for a process whereby GAL liaises with the rail, coach and bus operators, as well as the local transport authorities, to get a better understanding of future travel behaviour and how this will influence any changes in demand for services. This needs to form part of GAL's Airport Surface Access Strategy.</p> <p>Updated position (Deadline 1): We would like to know the outcome of these discussions and how they have been incorporated into the proposed PT service provision.</p>	<p>GAL undertakes regular engagement with operators as part of its current Airport Surface Access Strategy and will continue to do so. GAL has also engaged with operators in relation to the proposals which form part of the Project. The Surface Access Commitments document sets out GAL's commitments to delivering public transport service improvements and achieving certain mode shares. In due course, in line with relevant policy requirements, a future ASAS will be developed which will include a continued programme of engagement with public transport operators and local authorities and be in full cognisance of the surface access commitments GAL is making as part of the Project.</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion
2.20.5.4	Electric Vehicle (EV) Charging	<p>GAL must ensure that EV charging in airport car parks meets anticipated demand, using scenarios for EV adoption from the Government's 2023 Transport Decarbonisation Plan.</p> <p>Updated position (Deadline 1): Issues for GAL to consider: - Dynamic tariffs that support charging at off peak times, to lower congestion and to encourage use when the cost of energy grid carbon intensity is lowest</p>	<p>GAL will keep the provision of EV charging infrastructure in airport car parks under review to ensure continued compliance with relevant Government policy.</p>		Under discussion

		<ul style="list-style-type: none"> - Areas that support public charging exclusively (non-airport vehicles) - Pre-bookable chargers - Commercial charging for vehicles associated with the airport should have designated zones. - Automated allocation of a specific charger on arrival (at busy times). This will prevent the reserving of chargepoints by users for friends colleagues, improve fair use. - Options that limit a charge to a specific percentage e.g. 80% times to support higher throughput. 			
2.20.5.5	Electric Vehicle (EV) Charging	GAL must work with both third-party parking providers and local authorities to boost charging facilities in the area around the airport.	GAL will keep the provision of EV charging infrastructure in airport car parks under review to ensure continued compliance with relevant Government policy.	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 in this Statement of Common Ground.</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
<i>There are no issues relating to Water Environment in this Statement of Common Ground.</i>					

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 East Sussex County Council	Name
	Job Title
	Date
	Signature

DRAFT

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	Technical Officers Group Meeting
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