

Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Mole Valley District Council

Book 10

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Table of Contents

1	Intro	oduction	3
2	Cur	rent Position	5
	2.1.	Agricultural Land Use and Recreation	5
	2.2.	Air Quality	6
	2.3.	Capacity and Operations	13
	2.4.	Climate Change	14
	2.5.	Construction	15
	2.6.	Cumulative Effects and Interrelationships	16
	2.7.	Draft DCO and Explanatory Memorandum	17
	2.8.	Ecology and Nature Conservation	18
	2.9.	Forecasting and Need	20
	2.10.	Geology and Ground Conditions	21
	2.11.	Greenhouse Gases	22
	2.12.	Health and Wellbeing	26
	2.13.	Historic Environment	27
	2.14.	Landscape, Townscape and Visual	30
	2.15.	Major Accidents and Disasters	31
	2.16.	Noise and Vibration	32
	2.17.	Planning and Policy	45
	2.18.	Project Elements and Approach to Mitigation	47
	2.19.	Socio-Economics and Economics	48
	2.20.	Traffic and Transport	50
	2.21.	Waste and Materials	55
	2.22.	Water Environment	56
3	Sig	natures	57
Α	ppendi	ix 1: Record of Engagement Undertaken	58



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 Mole Valley District 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.
- "No longer pursuing" to indicate that while the Authority may not feel that a satisfactory outcome has been reached, the matter/issue is no longer being pursued.



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		
There are no is	There are no issues relating to Agricultural Land Use and Recreation within this Statement of Common Ground.						



2.2. Air Quality

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

Table 2.2 Statement of Common Ground – Air Quality Matters

Sesement Methodology Laz.C. 1 Lack of locating by the baseding for this spic within this Statement of Common Ground. Assessment Methodology Laz.C. 2 Lack of locating breakdown for AC impacts and mitigation Document Ref(s): APP-038, APP-156, APP- 042 Lack of locating breakdown for this spic within this Statement Industry and mitigation Document Ref(s): APP-038, APP-156, APP- 042 Lack of locating breakdown for this spic within this Statement Industry and mitigation as a whole or how casts will be shared, through mitigation and is claimed to have been determinating one is the sessential to effective and necessary mitigation and the solution of to have been onderfined under the Society-Commonic Effects of Chapter 17, However, there is no mention of such costs in Chapter 17 and these costings are not clearly and robustly set out. The Applicant has had insufficient regard to the possible health impacts or be assessed and mitigated Document Ref(s): APP-038 Lack of locating breakdown for this spicial with the video community once they have been determined to some special production in air quality may be considered detrimental to some degree for public health, to, not registate the registation terms. Lack of locating breakdown for this spicial cannot be considered detrimental to some degree for public health in EIA Regulation terms. Lack of locating the production in a significant of the spicial cannot be successed in the spicial cannot be received in the spicial cannot be received in the spicial cannot be spicial to the possible health impacts or the spicial cannot be spicial to the possible health impacts or the spicial cannot be spicial to the property of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of the spicial cannot be spicial to the production of	Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status					
Assessment Methodology 22.2.1 Lack of costing breakdown for AQ impacts and mitigation to accounter Ref(s): APP-038, APP-168, APP-049, AP	Baseline			i ·		l					
Lack of costing broadworn of Managers and Miligation Document Ref(s): APP-038, APP-156, APP-042) APP-156, APP-042 APP-156, APP-042 APP-156, APP-042 APP-156, APP-042 APP-156, APP-054 APP-054, APP-055	There are no issues relating to the baseline for this topic within this Statement of Common Ground.										
impacts and miligation Document Ref(s): APP-038, APP-156, APP- 042 Ultra-fine particles need to be seesed and miligated bocument Ref(s): APP-038 are not clearly and robustly set out. Ultra-fine particles need to be seesed and miligated bocument Ref(s): APP-038 are a known as a seeseed and considered fully. As written (13.2.5. Environmental Statement Chapter 17 and not deathy and robustly set out the shared, through miligation and when so many people live in proximity to the airport it seems an obvoids him go to a known and people and when so many people live in proximity on the airport it seems an obvoids him go to a known and people and a particles are indeptlyed and considered during mechanisms. With the presence of cost analysis is alluded to Appendix 13.3.1. Table 2.1.1 and 13.12.6. (APP-03.8) Assessment There are no issues relating to the assessment for this topic within this Statement of Common Ground.	Assessment	Assessment Methodology									
be assessed and mitigated Document Ref(s): APP-038 levels of ultra-fine particles that could exist, specifically from aviation sources, but from other sources as well (i.e. transport). Ultra fine particles are a known issue with airports (DEFRA/MC Quality Expert (Foup) and when so many people live in proximity to the airport it seems an obvious thing to have assessed and considered fully. As written (13.2.5, Environmental Statement: Chapter 13 - Air Quality) the significance is underplayed and considered in a token manner in other sections. Despite the significance of understanding costs in order to mitigate impacts, there is no suitable consideration as to the financial implications of identified impacts. Nor is there any information or how said costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. While the presence of cost analysis is alluded to (Appendix 13.3.1, Table 2.1.1 and 13.1.26, (APP-038, APP-156 and APP-042)) and supposedly detailed in Chapter 17, these are absent from Chapter 17 and not clearly and robustly set out. As such, it is the Council's view that health impacts from air quality implications have not been sufficiently addressed and the submission documents are misleading. Assessment There are no issues relating to the assessment for this topic within this Statement of Common Ground.	2.2.2.1	for AQ impacts and mitigation Document Ref(s): APP-038, APP-156, APP-	impacts from increased levels of air pollution have been calculated across the population as a whole or how costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. Understanding costs is essential to effective and necessary mitigation and is claimed to have been considered under the Socio-Economic Effects of Chapter 17. However, there is no mention of such costs in Chapter 17 and	Impact Assessment includes the TAG assessment identifying the air quality damage costs of the Project. The Health and Wellbeing Effects from Changes to Air Quality are fully and comprehensively assessed in ES Chapter 18 Health and Wellbeing (see section 18.8). Overall, the minor adverse air quality assessments reflect that, whilst any reduction in air quality may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant	Needs Case Appendix 1 – National Economic Impact Assessment [APP-251] ES Chapter 18 Health and Wellbeing, [APP-	Agreed					
impacts, there is no suitable consideration as to the financial implications of identified impacts. Nor is there any information or how said costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. While the presence of cost analysis is alluded to (Appendix 13.3.1, Table 2.1.1 and 13.12.6, (APP-038, APP-156 and APP-042)) and supposedly detailed in Chapter 17, these are absent from Chapter 17 and not clearly and robustly set out. As such, it is the Council's view that health impacts from air quality implications have not been sufficiently addressed and the submission documents are misleading. **Assessment** There are no issues relating to the assessment for this topic within this Statement of Common Ground.**	2.2.2.2	be assessed and mitigated	levels of ultra-fine particles that could exist, specifically from aviation sources, but from other sources as well (i.e. transport). Ultra fine particles are a known issue with airports (DEFRA/Air Quality Expert Group) and when so many people live in proximity to the airport it seems an obvious thing to have assessed and considered fully. As written (13.2.5, Environmental Statement: Chapter 13 - Air Quality) the significance is	undertaken and is reported in the ES health and wellbeing chapter. That assessment considers the emerging scientific understanding of UFPs as a public health issue. The approach follows IEMA 2022 guidance on assessing human health effects in	and Wellbeing [APP-						
There are no issues relating to the assessment for this topic within this Statement of Common Ground.	2.2.2.3		impacts, there is no suitable consideration as to the financial implications of identified impacts. Nor is there any information or how said costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. While the presence of cost analysis is alluded to (Appendix 13.3.1, Table 2.1.1 and 13.12.6, (APP-038, APP-156 and APP-042)) and supposedly detailed in Chapter 17, these are absent from Chapter 17 and not clearly and robustly set out. As such, it is the Council's view that health impacts from air quality implications have not been	Applicant to provide response at future deadline.	n/a						
There are no issues relating to the assessment for this topic within this Statement of Common Ground.	Assessment			<u> </u>	<u> </u>	l					
		issues relating to the assessme	nt for this topic within this Statement of Common Ground.								
		•	and topic main and distributed formular distributed								



2.2.4.1	Significance of construction and transport management plans Document Ref(s): General	It is not currently clear how the impacts of both construction and transport will be offset/mitigated. To date, the information provided around how and when mitigation will be implemented is both high level and non-committal. It will be through the construction and management plans that authorities and communities can obtain assurance that the AQ impacts will be properly dealt with. To date, there has been no draft management plans which provide the necessary level of detail. 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 for the operational phase. Please can GAL confirm this response is out of date. In relation to the construction phase it is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared. This is still requested.	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. 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. Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO. The Carbon Action Plan sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access emissions are set out in ES Appendix Surface Access Commitments. 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.	Section 13.9 of ES Chapter 13 Air Quality [APP-038] ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3) ES Appendix 5.4.2: Carbon Action Plan [APP-091] ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161] ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Under discussion
			sources. Commitments on surface access emissions are set out in ES Appendix Surface Access Commitments. 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		
			Updated position (Deadline 1): GAL will provide a draft Outline AQAP to the LAs by 26 th March (to align with Deadline 2), with the intention of submitting an Outline AQAP into the Examination in due course taking account of any feedback from the LAs. A note explaining the draft Outline CDMP will be shared with CBC for comment by 26 th March (to align with Doadline 2), with the		
			for comment by 26 th March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.		
2.2.4.2	Clarification around air quality complaints procedure is needed Document Ref(s): APP-082	Paragraph 4.12.7 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice) identifies that a complaints procedure will be established but does not reference the sharing of complaints and resolution with local authorities. This measure is also identified within the	Measures that will be in place through the construction of the Project including recording dust and air quality complaints are detailed in Section 5.8 of the ES Appendix Construction Period	ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]	Under discussion



	T				
		site management air quality section as something that will be made	Mitigation and are included in the Code of Construction Practice,	ES Appendix 5.3.2:	
		available to local authorities.	to be secured under the requirements of the DCO.	Code of Construction	
				Practice (Doc Ref. 5.3)	
		Updated position (Deadline 1): The COCP is insufficiently detailed and	Paragraph 2.2.7 of the CoCP sets out that Construction Dust		
		further information is expected as part of the DCO process.	Management Plans (CDMP) will be prepared in accordance with		
			the CoCP.		
		It is welcomed that the applicant is happy to review the wording of the			
		complaints and reporting process to ensure that information on complaints	Management plans will be prepared for specific areas of the		
		and their resolution is shared in a timely fashion.	Project to reflect any site-specific conditions or measures to		
		,	mitigate dust impacts (set out in para 5.8.2 of the CoCP).		
		The Applicant, in reviewing this SoCG, is referred to the Council's	initigate dust impaste (est out in para eleiz el alle eser).		
		comments and supporting mitigation tables within the Joint Surrey	The CDMPs will be prepared for approval by the relevant local		
		Council's Local Impact Report.	planning authority prior to construction works commencing, as		
			confirmed in paragraph 5.8.2 of the CoCP.		
			The applicant is happy to review the wording of the complaints		
			and reporting process with the local authorities during the SOCG		
			meetings.		
			Updated position (Deadline 1): A note explaining the draft		
			Outline CDMP will be shared with CBC for comment by 26 th March		
			(to align with Deadline 2), with the intention of submitting the note		
			into the Examination in due course taking account of any		
			feedback received.		
			reedback received.		
2.2.4.3	Need for the Dust	The monitoring portion of Section 5.8 (Environmental Statement:	Measures that will be in place through the construction of the	ES Appendix 13.8.1:	Under
	Management Plan (DMP) to	Appendix 5.3.2: Code of Construction Practice) suggests that further	Project including mitigation and monitoring of dust are detailed in	Air Quality	discussion
	be considered through the	detailed plans are needed to design a DMP. This is not considered to be	Section 5.8 of the ES Appendix Construction Period Mitigation	Construction Period	
	examination Document	correct and a draft DMP can be developed with the information available	and are included in the Code of Construction Practice, to be	Mitigation [APP-161]	
	Ref(s): APP-082	at this time, with updates implemented as needed.	secured under the requirements of the DCO.	mitigation [Air 101]	
	1 (3). Al 1 -002	at this time, with appeales implemented as needed.	secured under the requirements of the Boo.	ES Appendix 5.3.2:	
		Undeted position (Deadline 1): It is understood that a final DMD connet	Deregraph 2.2.7 of the CoCD acts out that Construction Duct	Code of Construction	
		Updated position (Deadline 1): It is understood that a final DMP cannot	Paragraph 2.2.7 of the CoCP sets out that Construction Dust		
		yet be provided, but an outline or draft DMP can be prepared.	Management Plans (CDMP) will be prepared in accordance with the CoCP.	Practice (Doc Ref. 5.3)	
		This is still requested and we welcome the commitment to discuss further.			
		This is sail requested and we welcome the communicity to discuss further.	Management plans will be prepared for specific areas of the		
		The Applicant, in reviewing this SoCG, is referred to the Council's	Project to reflect any site-specific conditions or measures to		
		comments and supporting mitigation tables within the Joint Surrey	mitigate dust impacts (set out in para 5.8.2 of the CoCP).		
			inningate dust impacts (set out in para 5.6.2 of the Coop).		
		Council's Local Impact Report.	The CDMPs will be prepared for approval by the relevant local		
			planning authority prior to construction works commencing, as		
			confirmed in paragraph 5.8.2 of the CoCP.		
			The applicant is happy to review the DMP requirements with the		
			local authorities during the SOCG meetings.		



			Updated position (Deadline 1): A note explaining the draft Outline CDMP will be shared with CBC for comment by 26 th March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.		
2.2.4.4	Operational monitoring mechanisms need to be clear Document Ref(s): APP-082, APP-090	Operational monitoring will be very important to understand if changes in air quality are occurring or unacceptably worsening. There is no information in either the Air Quality chapter (Environmental Statement 5.1: Chapter 13) or the Surface Access Commitments document (Environmental Statement 5.3: Appendix 5.4.1) of how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored. Concerns remain that, as presented, key monitoring mechanisms and related management plans (i.e. Dust Management Plan) are deferred for agreement outside of the application stage (e.g. S106)	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.	ES Chapter 13 Air Quality [APP-038]	Under discussion
		and would not be scrutinised or properly considered as part of the application. For example, operational phase monitoring is discussed in paragraphs 13.9.7 to 13.9.19 of the Environmental Statement. (Appendix 5.3.2: Code of Construction Practice). It is proposed by the Applicant that a S106 agreement is utilised to address the matter, rather than it forming part of the application which is being assessed. The Council suggests that this is done during the examination to ensure that monitoring is scrutinised and agreed in a timely fashion. Further details of the monitoring, locations, numbers of sites, techniques, funding and how air quality monitoring data will be evaluated against the predictions of the ES and the Surface Access Commitments is not provided by the Applicant.	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. The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO ₂ , PM ₁₀ and PM _{2.5}) and the impacts from the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occurring as a result of airport activity.		
		Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Gatwick 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).		
2.2.4.5	Air Quality	The Council would also like to raise concerns that it is not confident in the monitoring mechanisms that would need to assess change in AQ levels over time as air traffic movements increase/alter. Monitoring is an essential mechanism that can enable authorities and the airport to respond accordingly for the benefit of communities and public health. It is essential that there is confidence that proper monitoring mechanisms and indicators are established at the outset and reviewed as necessary. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within	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.	Section 13.9 and Section 13.10 of ES Chapter 13 Air Quality [APP-038]	Under discussion
		the Joint Surrey Council's Local Impact Report.	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.		
			The draft Section 106 agreement sets out the mechanism for		
			monitoring air quality (NO ₂ , PM ₁₀ and PM _{2.5}) and the impacts		
			from the Proposed Development, to identify and manage any new		
			exceedances of the National Air Quality Standards occurring as a		
			result of airport activity.		
			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).		
0010	A. O. III			0 11 10 0 1 = 0	
2.2.4.6	Air Quality	While it is acknowledged that the Applicant has committed to addressing	ES Chapter 13: Air Quality has provided an assessment of air	Section 13.9 of ES	Under
		impacts, monitoring and mitigation through s106 mechanisms, this is	quality impacts from all related sources (road vehicles, aircraft and	Chapter 13 Air Quality	discussion
		considered to be too late and needs to be understood more thoroughly	airport sources) following the methodology agreed with the local	[<u>APP-038</u>]	
		upfront. The Applicant is yet to provide any type of construction-related	councils. A robust assessment presenting reasonable worst case	0(
		management plan, including that which is r carried out effective ultra-fine	effects has been provided in line with best practice guidance and	Section 18.8 of ES	
		particle assessments, which are relevant and a likely air quality impact to	available data.	Chapter 18: Health and	
		Mole Valley communities. Ultra-fine particles are not just likely to stem	A	Wellbeing [APP-043]	
		from aircraft, but also traffic and construction processes and the	An assessment of ultra-fine particulate matter (UFP) has been	"Health and wellbeing	
		assessment and mitigation must be addressed where necessary.	undertaken and is reported in the ES health and wellbeing	effects from changes to	
			chapter. That assessment considers the emerging scientific	air quality" paragraphs	
		Updated position (Deadline 1): It is understood that a final DMP cannot	understanding of UFPs as a public health issue. The approach	18.8.67 to 18.8.86.	
		yet be provided, but an outline or draft DMP can be prepared.	follows IEMA 2022 guidance on assessing human health effects in	FO A	
		This is still as a constant and an almost a constant and the constant and	EIA.	ES Appendix 5.3.2:	
		This is still requested and welcome the commitment to discuss further.		Code of Construction	
		The Applicant in regioning this CoCC is referred to the Councille	The air quality assessment concludes that the impact of the	Practice [APP-082]	
		The Applicant, in reviewing this SoCG, is referred to the Council's	Proposed Development would not be significant. As such, taking	FC Annandiy F 4 2	
		comments and supporting mitigation tables within the Joint Surrey	into account embedded mitigation, no other mitigation is required	ES Appendix 5.4.2: Carbon Action Plan	
		Council's Local Impact Report.	as a result of the project.	[APP-091]	
			This notwithstanding, the assessment in Section 13.9 of ES	[
			Chapter 13: Air Quality sets out the proposed measures with the	ES Appendix 13.8.1:	
			aim of reducing the airport contribution to local air quality	Air Quality	
			regardless of significance.	Construction Period	
				Mitigation [APP-161]	
			Measures that will be in place through the construction of the		
			Project including mitigation and monitoring of dust are detailed in	ES Appendix 5.3.2:	
			Section 5.8 of the ES Appendix Construction Period Mitigation	Code of Construction	
			and are included in the Code of Construction Practice, to be	Practice (Doc Ref. 5.3)	
			secured under the requirements of the DCO. Paragraph 2.2.7 of		



	T	T	the CoCD acts out that Construction Dust Management Plans	EC Annondiy E 4 4.	-
			the CoCP sets out that Construction Dust Management Plans	ES Appendix 5.4.1: Surface Access	
			(CDMP) will be prepared in accordance with the CoCP.		
			The Contrar Action Discounts out outcomes that CAL is consocition.	Commitments [APP-	
			The Carbon Action Plan sets out outcomes that GAL is committing	090]	
			to deliver for key airport operational and construction emissions		
			sources. Commitments on surface access emissions are set out in		
			the Surface Access Commitments.		
			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.		
			In addition to monitoring key pollutants GAL commits to		
			participating in national aviation industry body studies of UFP		
			emissions at airports including those reviewing how monitoring		
			could be undertaken, as discussed in the Health and Wellbeing		
			assessment.		
			Updated position (Deadline 1): A note explaining the draft		
			Outline CDMP will be shared with CBC for comment by 26 th March		
			(to align with Deadline 2), with the intention of submitting the note		
			into the Examination in due course taking account of any		
			feedback received.		
			reedback received.		
2.2.4.7	Air Quality	Ensuring management plans are shared and scrutinised, at least in draft,	Measures that will be in place through the construction of the	ES Appendix 13.8.1:	Under
		as well as a complaints policy and monitoring strategy is essential and	Project including recording dust and air quality complaints are	Air Quality	discussion
		needs to be resolved as part of ongoing discussions. Should the DCO be	detailed in Section 5.8 of the ES Appendix Construction Period	Construction Period	
		approved, in the absence of such management plans, implementation	Mitigation and are included in the Code of Construction Practice,	Mitigation [APP-161]	
		could fall short of what is necessary and appropriate.	to be secured under the requirements of the DCO.		
		,	Paragraph 2.2.7 of the CoCP sets out that Construction Dust	ES Appendix 5.3.2:	
		Updated position (Deadline 1): It is understood that a final DMP cannot	Management Plans (CDMP) will be prepared in accordance with	Code of Construction	
		yet be provided, but an outline or draft DMP can be prepared.	the CoCP.	Practice (Doc Ref. 5.3)	
		This is still requested and welcome the commitment to discuss further.	Management plans will be prepared for specific areas of the		
			Project to reflect any site-specific conditions or measures to		
		The Applicant, in reviewing this SoCG, is referred to the Council's	mitigate dust impacts (set out in para 5.8.2 of the CoCP).		
		comments and supporting mitigation tables within the Joint Surrey			
		Council's Local Impact Report.	The CDMPs will be prepared for approval by the relevant local		
			planning authority prior to construction works commencing, as		
			confirmed in paragraph 5.8.2 of the CoCP.		
			Updated position (Deadline 1): A note explaining the draft		
			Outline CDMP will be shared with CBC for comment by 26 th March		
			(to align with Deadline 2), with the intention of submitting the note		
			(to alight with Deadline 2), with the intention of Submitting the note		





			into the Examination in due course taking account of any feedback received.					
Other	her							
There are no c	ther issues relevant to this top	ic in this Statement of Common Ground.						



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	
Please see the	Please see the joint Statement of Common Ground prepared in relation to Capacity and Operations (Doc Ref. 10.1.18).					



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	Issues Tracker Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status			
	Reference							
There are no i	There are no issues relating to Climate Change within this Statement of Common Ground.							



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			
There are no is	There are no issues relating to Construction within this Statement of Common Ground.							



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	
There are no is	There are no issues relating to Cumulative Effects and Interrelationships within this Statement of Common Ground.					



2.7. Draft DCO and Explanatory Memorandum

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status		
There are no is	There are no issues relating to the Draft DCO and Explanatory Memorandum within this Statement of Common Ground.						



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 is	ssues relating to the bas	eline for this topic within this Statement of Common Ground.			
Assessment N	Methodology				
There are no is	ssues relating to the ass	essment methodology for this topic within this Statement of Common Ground.			
Assessment					
There are no is	ssues relating to the ass	essment for this topic within this Statement of Common Ground.			
Mitigation and	d Compensation				
2.8.4.1	Biodiversity	The Council welcomes the ambitious Biodiversity Net Gain (BNG) target (22.5%) set out within the examination documents. However, the Council would like to seek clarity on: • long-term maintenance arrangements for Church Meadows; • further information regarding on habitat trading and what options were considered and discounted when arriving at the conclusion that GAL would not be able to meet Habitat Trading standards; and • information on the extent to which land beyond the NRP boundary was considered for improvements and biodiversity enrichment, as well as opportunities for better design through landscaping. Updated position (Deadline 1): MVDC thanks GAL for confirming the non-statutory requirement for BNG in the NSIP process. The Council also thanks the clarity provided on the 'trading' element. However, for transparency, the Council questions whether BNG should be referred to if there is no statutory requirement as this could be considered misleading. Assurances are needed that ecology requirements will be met and impacts mitigated.	We are pleased the Council welcomes the ambition to achieve a 22.5% BNG on the Northern Runway Project. As the Council may be aware, BNG is not yet mandatory for NSIPs and, as such, Gatwick does not have to fulfil the trading rules, although we have had regard for these in developing our proposals. The BNG trading deficit arises primarily because the NRP requires the removal of woodland along the A23 which cannot be fully replanted within the Project order limits because of aerodrome safeguarding concerns. Natural England have accepted in discussions with GAL the reasons why the trading rules haven't been achievable. The extent of woodland that can be recreated has been maximised to ensure that the deficit is as small as possible (including through new woodland planting in the Longbridge Roundabout open space and Car Park B). Discussions were had with the Biodiversity Sub-Group with respect to options for off-site planting of woodland on third party land to address the remaining deficit but, to date, no group has engaged with GAL. With respect to the consideration of land outside the order limits, these have been drawn around the Project as a whole and include significant land out with the existing airport boundary at both Museum Field, Brook Farm and Longbridge Roundabout. Once these areas were incorporated into the Project for landscaping purposes, the order limits were drawn around them. The arrangement for the Open Space at Church Meadows is expressed in the Draft DCO: "Special category land 40.— (1) On the exercise by the undertaker of the Order rights, the special category land identified in Part 1 of Schedule 10 (special category land to be permanently acquired and for which replacement land is provided) is not to vest in the undertaker until the undertaker has		Under discussion



	acquired the replacement land (to the extent not already in its
	ownership) and an open space management plan has been
	submitted to, and approved in writing by, the relevant planning
	authority.
	(2) The open space management plan submitted under paragraph
	(1) must be in general accordance with the outline landscape and
	ecology management plan.
	(3) On the requirements of paragraph (1) being satisfied, the special
	category land identified in Part 1 of Schedule 10 is to vest in the
	undertaker (or any specified person) and be discharged from all
	rights, trusts and incidents to which it was previously subject.
	(4) The undertaker must implement the open space management
	plan approved by the relevant planning authority under paragraph
	(1) and on the date on which the replacement land is laid out and
	provided in accordance with that plan, the replacement land is to
	vest in the persons in whom the special category land specified in
	paragraph (1) was vested on the date of the exercise of the Order
	powers (if the replacement land is not already owned by those
	persons) and is to be subject to the same rights, trusts and incidents
	as attached to the special category land."
	(5) In this article— "Order rights" means rights and powers
	exercisable over the special category land by the undertaker under
	article 27 (compulsory acquisition of land) and article 28
	(compulsory acquisition of rights and imposition of restrictive
	covenants); "outline landscape and ecology management plan"
	means the document certified as such by the Secretary of State
	under article 51 (certification of documents, etc.); and "specified
	person" means a person other than the undertaker for whose benefit
	the replacement land or rights are being acquired.
e are no other issues relevant to this topic within 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		
Please see the	Please see the joint Statement of Common Ground prepared in relation to Forecasting and Need (Doc Ref. 10.1.18).						



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			
There are no is	There are no issues relating to Geology and Ground Conditions within this Statement of Common Ground.							



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			1	ı	l
2.11.1.1	Climate Change and Greenhouse Gas Emissions	Furthermore, the Council remains unconvinced that the baseline position and approach to considering climate/carbon impacts is robust when considered against both the Jet Zero publication and the national targets for zero carbon. There is some sympathy for the Applicant in that the Government has not always been clear on potential conflicts between the two matters but the Council considers that the Applicant has not gone far enough in its assessments to give confidence that the climate impacts of the NRP will be as are depicted, or accord with the government agenda.	It is unclear what the specific deficiency is that the comment relates to. The assessment process has sought to follow appropriate guidance.	n/a	No longer pursuing.
Assessment	Methodology				
2.11.2.1	Over reliance on possible future technologies and lack of regard for cumulative impacts from other airspace/port changes Document Ref(s): APP-041, APP-045, APP-194	The Council does not consider the scenario testing for emissions robust or realistic as there is: 1) A clear reliance on new technologies and supposed improvements in aviation when modelling emissions. Yet, there are no guarantees that these technologies will materialise or that the airlines with the ability to use them will operate out of Gatwick. 2) Insufficient regard to the possible impacts of wider London airport expansion plans and airspace change programmes. Both elements will cumulatively impact emissions and the approach taken by GAL is too singular and presents the best case scenario and not what will actually happen in reality. Updated position (Deadline 1): It is acknowledged that 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. Sensitivity testing is for the purpose of what the impacts of the NRP would be, should future technologies not come forward as intended. The Council seeks reassurances on how this will be monitored and responded to, should policy not be as successful as the government hope.	The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4. It is not for the applicant or for the examination to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance. 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 projectsshould not be individually assessed, as there is	ES Chapter 16 Greenhouse Gases [APP-041] ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194]	Under discussion



2.11.2.2	Climate Change and Greenhouse Gas Emissions	The Council has been unable to determine if the full suite of emission generating-building works and longer-term upkeep and replacement has been accounted for within the presented emission forecasts. This should include the emissions which will be generated by all proposed buildings (including new hotels and offices) not just those relating to the immediate airport and passenger terminals etc. The Applicant needs to clarify this matter to provide assurances that calculations are not capturing only half of the story. If full audit has not been made, then work should be carried out or a clear justification provided. Updated position (Deadline 1): It is agreed that emission sources from developments outside of the scope of GAL's boundary are not to be considered as it's not possible to predict. However, GAL should recognise the potential impact of emissions stemming from airport operations, at least qualitatively, for transparency. This acknowledgement aligns with one of the key principles of GHG accounting.	The assessment considers the construction and emissions arising from buildings and infrastructure as set out in the Project Description. The assessment does not seek to assess impacts from potential future development that might arise indirectly from the presence of the existing airport, or the airport under the NRP, that is not yet consented. It is not considered reasonable to expect the assessment to consider all potential economic development that might be associated in some way with the airport where no proposals currently exist.	ES Chapter 5 Project Description (Doc Ref. 5.1)	Under discussion
2.11.2.3	Climate Change and Greenhouse Gas Emissions	Regarding carbon calculations, the Council appreciates that the national position and research regarding climate change and greenhouse gases is a moving feast. However, for the benefit of robustness, the examination should require an update on cumulative effects regarding climate implications when considered against the newest PAS 2080 standards (April 2023). This information was available prior to submission and regard should have been had. Other more recent standards and publications may also be relevant to any update. Updated position (Deadline 1): It is acknowledged in the CAP (Appendix 5.4.2: Carbon Action Plan) that the Applicant will only use Principal Contractors who are PAS 2080: 2023 Carbon management in infrastructure and buildings (as amended) certified.	The PAS 2080 is a specification that sets out how effective carbon management can take place for infrastructure and buildings projects – it does not provide guidance on how the impact of a project should be assessed, nor does it provide guidance on how a cumulative assessment of impact should take place. 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 projectsshould 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'."	n/a	No longer pursuing
2.11.2.4	Climate Change and Greenhouse Gas Emissions	The NRP places great weight on new technologies and fuel types as the basis to justify its case in terms of emission and environmental impacts. Yet, there are no guarantees that these technologies will materialise, or that the airlines with the ability to use them will operate out of Gatwick. In addition, there is insufficient regard to the cumulative impacts of wider London airport expansion plans and airspace change programmes, all of which will contribute to emissions. As such, the approach taken by the Applicant, as presented, is too singular and presents the best-case	The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194].	Para 16.1.4 of ES Chapter 16 Greenhouse Gases [APP-041]	Under discussion



Mitigation and 2.11.4.1	A more innovative and committed strategy to reducing emissions is needed Document Ref(s): APP-091	scenario. Scenarios should be based on a 'full-spread' of possible emissions and impacts rather than a 'hope for the best' approach. Updated cumulative assessments are needed to factor in the necessary scenarios (Appendix 5.1). Updated position (Deadline 1): It is acknowledged that 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. Sensitivity testing is for the purpose of what the impacts of the NRP would be, should future technologies not come forward as intended. The Council seeks reassurances on how this will be monitored and responded to, should policy not be as successful as the government hope. Appendix 5.4.2: Carbon Action Plan does not show sufficient commitment or provide an innovative solution to carbon emissions. Carbon offsetting should be a 'last resort' approach to managing emissions. The Council does not consider that the Applicant has gone far enough in seeking to reduce emissions. Coupled with a reliance on new, but uncertain technologies, it is likely that a greater reliance on less beneficial offsetting would be required. Updated position (Deadline 1): As per the Streamlined Energy and Carbon Reporting (SECR) process, the Applicant's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for Renewable Electricity Guarantees of Origin (REGO). This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use. The Council consider that the Applicant should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.	It is not for the applicant or for the examination to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance. 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 projectsshould 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." 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]	Under discussion
2.11.4.2	Climate Change and Greenhouse Gas Emissions	The Applicant has placed too much emphasis on the option of offsetting carbon emissions as opposed to seeking ways to mitigate them on-site. The Carbon Action Plan (Appendix 5.4.2) is unduly light on the commitment to consider and deliver innovative and reasonable	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	ES Appendix 5.4.2: Carbon Action Plan [APP-091]	Under discussion



solutions. Offsetting should be a 'last resort' mechanism yet, as read, it appears to be considered as the main solution. With such a large-scale project, it is considered that the Applicant has not taken advantage of opportunities to be a pioneer for innovative climate limiting development within the built and natural form of the application area and beyond. This could include design, operations and a wider introduction of sustainable technologies for static structures.

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.

Updated position (Deadline 1): As per the Streamlined Energy and Carbon Reporting (SECR) process, the Applicant's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for Renewable Electricity Guarantees of Origin (REGO). This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.

The Council consider that the Applicant should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.

Other

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



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			
There are no is	There are no issues relating to Health and Wellbeing within this Statement of Common Ground.							



2.13. Historic Environment

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

Table 2.13 Statement of Common Ground – Historic Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no	issues relating to the b	aseline for this topic within this Statement of Common Ground.			
Assessment	Methodology				
2.13.2.1	Heritage	The Applicant argues (APP-032) that it has used a Historic England- commissioned report on how to assess the impact of a change in operational aircraft noise on the setting of heritage assets to undertake its assessments. This uses a noise contour area based on the change in noise from aircraft resulting from the proposed expansion. Within the area where the noise change is above a certain threshold (+1dB Leq16 and +25% N60), the heritage assets are further filtered based on four 'sensitivity' categories A-D. Updated position (Deadline 1): The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.	The report commissioned by English Heritage (now Historic England) and published in 2014 is titled Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England, usually shortened to Aviation Noise Metric and sometimes as known as the Temple methodology. This report is named in paragraph 5.194 of the Airports NPS as the appropriate guidance document for the assessment of air noise impacts on heritage assets. This use of the Aviation Noise Metric has been discussed at length with Historic England, who have advised in their Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly. It should be noted that the noise change contours established for the assessment are based on the predicted changes to the average summer daytime noise level (Leq 16 hr). The +25 daytime N60 contour was not used in this process. This is set out in section 5.4 of ES Appendix 7.6.1.	ES Appendix 7.6.1: Historic Environment Baseline Report [APP- 101]	No longer pursuing
2.13.2.2	Heritage	There are many other listed buildings that fall within the wider envelope that have not been recognised but whose setting would be impacted by the increase in the number of flights. MVDC has previously raised concerns through the pre-application process and observed that buildings had been screened out unnecessarily and were assured the methodology would be looked at. This has not been done and Consultation Report Annex A (APP-219) confirms that no changes have been made as result of comments. Updated position (Deadline 1): The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.	The four categories of noise-sensitive heritage assets (Categories A-D) were reviewed in order to see if any other designated heritage assets within the noise change contours could fall into one or more of these four categories. This included consideration of listed farmhouses and former farmhouses. The outcome of this review was that no other designated heritage assets within the noise change contours could fall into one or more of these four categories.	n/a	No longer pursuing



2.13.2.3	Heritage	The Council does not agree with the Applicant's interpretation of Historic England's methodology and considers that it should consider the 90 or so heritage assets within Mole Valley district under sensitivity Category D. The Applicant must verify and provide evidence which demonstrates whether Historic England approves of the approach taken and the interpretation of its methodology or seek to carry out the additional heritage assessment works to be robust and transparent. Updated position (Deadline 1): The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.	Within the Aviation Noise Metric, Category D noise-sensitive heritage assets are defined as those where 'The absence of 'foreign (modern) sounds' allow an asset to be experienced at 'a very specific point in time' that is intrinsic to understanding the heritage asset's significance'. The applicant does not consider any designated heritage asset within Mole Valley District and within the defined noise change contour to fall within this definition. The Section 56 Consultation Response from Historic England states: 'We note that the issue of air noise and its effect on tranquillity form part of the way in which the setting of designated heritage assets are experienced. We acknowledge the work done through the noise assessments (in particular the use of the Temple methodology, originally commissioned by English Heritage (now Historic England)) as specified in the Appendix 7.6.1 Historic Environment Baseline Report and summarised in the updated ES. The three most affected noise-sensitive heritage assets – viz. The Grade II listed Church of St John the Baptist, Capel (NHLE 1378150); the Grade II listed Quaker Meeting House with attached cottage at Capel (NHLE 1028737); and the relocated Grade II listed Lowfield Heath Windmill, Charlwood (NHLE 1298883) - would not experience a worsened aircraft noise impact based upon this assessment. This would also be the case in regard to the Grade II* listed Church of St Michael and All Angels at Lowfield Heath (NHLE 1187081). On the basis of this assessment we are content that no permanent significant harmful	n/a	No longer pursuing
			impacts to high-graded designated heritage assets from increased		
			aircraft noise would result from the scheme proposals.'		
Assessment	Horitago	Within Mole Valley, out of the 00 or ce heritage eccets within the naise	The Aviation Noise Metric identifies four entegring of poise	ES Chantor 7: Historia	No longer
2.13.3.1	Heritage	Within Mole Valley, out of the 90 or so heritage assets within the noise change contour area, only three heritage assets have been highlighted as sensitive to change – two places of worship (Category A) and a windmill (Category B). It is not clear why the increase in noise and visual movement would not be considered to have a greater significant impact on the historic environment of this area.	The Aviation Noise Metric identifies four categories of noise-sensitive heritage assets (Categories A-D). The assessment found that three designated heritage assets with Mole Valley could be identified as being within one of the four categories of noise-sensitive heritage assets as defined within the <i>Aviation Noise Metric</i> .	ES Chapter 7: Historic Environment [APP-032]	No longer pursuing
		Updated position (Deadline 1): The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.	Detailed assessment was then undertaken regarding the predicted noise change at each of these three designated assets, using noise measurements at each location. In all cases the overall significance of effect was assessed as no change. This was due to the predicted air noise with the Project in place actually being slightly less than at present. This is set out in		



			paragraphs 7.9.117- 7.9.122 of ES Chapter 7: Historic Environment.				
Mitigation and	Mitigation and Compensation						
There are no is	There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.						
Other	Other						
There are no other issues relating to this topic within this Statement of Common Ground.							



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

aseline		Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
					I
here are no is:	ssues relating to the baseline fo	or this topic within this Statement of Common Ground.			
ssessment M	Methodology				
	Landscape and the Area of Outstanding Natural Beauty (AONB)	It remains unclear whether the Surrey Hills AONB has been suitably considered through the Landscape, Townscape, and Visual Impact Assessment (LTVIA) (APP-033) in terms of the tranquillity assessment. While it is acknowledged that Natural England's review of the Surrey Hills boundary is ongoing, draft amendments are available to the Applicant and have been since March 2023. The Applicant has had sufficient information and time prior to submission to consider this and the Council does not consider there to have been due regard to these changes or the potential impacts. Updated position (Deadline 1): Assurances of how the Applicant will address this are needed.	Following contact with the Surrey Hills AONB unit regarding the progress of the boundary review process they confirmed that the evidence gathering in 2022 was complete and Natural England consultants are considering evaluation areas and Candidate Areas. Public consultation on the proposed extensions is ongoing in 2023. Any assessment of predicted effects on the landscape, views or perception of tranquillity on the basis of land that may or may not be included in the AONB is not included in the ES.	n/a	Under discussion
ssessment	ssues relating to the assessme	nt for this topic within this Statement of Common Ground.		1	
	Compensation	it for this topic within this statement of confinion Ground.			
	•	compensation for this topic within this Statement of Common Ground.			
ther		compensation of and topic main the diatement of commen creation			
	ther issues relating to this tonic	c within 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	
There are no is	There are no issues relating to Major Accidents and Disasters within this Statement of Common Ground.					



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	l		1	l	I
2.16.1.1	For engine ground running activities, the LAmax assessment does not adequately cover all sensitive receptor locations Document Ref(s): APP-173, APP-176	The assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB LAmax predictions by identifying car pass-by LAmax levels of 80dB. However, there is no attempt to contextualise LAmax engine ground running noise at any other receptor location. Updated position (Deadline 1): It is welcomed that GAL propose to provide further information. This matter remains under discussion. In addition the applicant should refer to comments in the LIR and supporting mitigation tables.	A technical note will be provided to the TWG providing further details of engine ground running noise levels and frequencies of occurrence at other receptor locations which demonstrates the Project will not give rise significant effects from engine ground running.	n/a	Not Agreed
Assessment	t methodology			-L	L
2.16.2.1	2032 assessment year is assessed as a worst case scenario, but there should be a yearly breakdown Document Ref(s): APP-172, APP-180	The assessment of air noise utilises 2032 which is identified as the worst-case in noise terms when compared to the base case of 2019 (Environmental Statement Appendix 14.9.2). However, identification of significant effects for all assessment years should be provided. The absence of this does not present a transparent account and is misleading. Identification of all years also enables a proper consideration of the level of mitigation that should be carried out and enable consistent monitoring. Updated position (Deadline 1): The quantification in tables 4.1.1 to 4.1.36 is considered insufficiently specific to help the applicant inform their mitigation strategies. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	 GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios modelled and reported in the ES. For air noise these comprise: 8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, Lmax and overflights; 5 assessment years – 2019, 2029, 2032, 2038 and 2047 2 Fleet transition scenarios, the Central Case and Slower Transition Case. These are presented in 71 figures in the ES relating to air noise impacts with the data tabulated in ES 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. Populations affected are provided for all 4 assessment years. The 	ES Chapter 14: Noise and Vibration [APP-039] ES Appendix 14.9.2 Air Noise Modelling [APP-172]	Not Agreed
			extent of air noise impacts for the first full year of operation is discussed in paragraphs 14.9.71 to 14.9.72 and for the Design Year 2038 in paragraphs 14.9.258 to 14.9.260 explaining why the impacts in these periods will be lower than in 2032. Mitigation addresses the worst case impacts expected in 2032. N60 contour areas and populations are provided for all years in Appendix 14.9.2.		



2.16.2.2	Overheating Document Ref(s): APP- 180	There is no adequate assessment of overheating and the necessary performance of ventilation to ensure a comfortable internal environment. Local authorities have requested an 'Overheating Assessment' to demonstrate adequacy of the ventilation scheme. This has not been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications. Updated position (Deadline 1): Overheating is not addressed by acoustic ventilators, which only introduce fresh air and do not have any cooling capability. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Overheating has been addressed by the provision of acoustic ventilators to all rooms with acoustic insulation. Further details have been developed on the specification of these ventilators and this will be provided in the technical note on implementation of the scheme and shared with the TWG.		Not Agreed
2.16.2.3	Eligibility for air Noise Insulation Scheme (NIS) Document Ref(s): APP- 180	The scheme assesses noise impacts based on average summer LAeq contour levels and the Council considers that this does not meet policy requirements and does not sufficiently protect against health impacts. Updated position (Deadline 1): There are specific and significant local impacts that are not suitably mitigated by the current proposals.	This issue has been responded to previously at Rows 13.4 and 13.100 of Table 13 in Appendix 1. The noise insulation scheme currently proposed for the Luton Airport Expansion Project DCO application (TR0200001) is based in average mode Leq day and night contours not single mode as suggested.	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 Document Ref(s): APP-172, General	Context is provided to the assessment of ground noise through consideration of the secondary LAmax (maximum sound level), overflight, Lden (average all day noise) and Lnight (average night time noise) 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. There is also concern over the time period for Lden as GMT appears to be used when local time should be consistently applied.	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. Seasonal and other movement data is provided in the Forecast Data Book. It is not clear where in the ES noise assessment it is indicated that GMT has been used to calculate Lden. Lden has been calculated using local time, not GMT.	ES Chapter 14: Noise and Vibration [APP-039]	Under discussion
2.16.2.5	Noise impacts from 'end- around' runways need sufficient consideration Document Ref(s): APP- 173, APP-176	The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate effectiveness. Details on ground noise model inputs, including source and bund locations, should be provided. While the Applicant suggests it has sought to address this issue following comments made in the preapplication and consultation stages, the Council does not agree and future impacts have been considered or will be mitigated.	As reported in Section 14.9 of the ES noise from use of the end around taxiways has been assessed. Details of the ground noise modelling were presented and discussed in the TWG. Further clarification on the performance of the noise barriers and bund proposed will be given in the TWG.	ES Chapter 14: Noise and Vibration [APP-039]	Not Agreed



		Updated position (Deadline 1): LAmax noise levels from use of end- around-taxiways have been provided but only for context and not for identifying significant effects. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.			
2.16.2.6	Noise	It is considered that the quantification of the impacts set out by the Applicant does not take into consideration the cumulative impacts of the different types of airport-related noise that have been modelled independently. This includes the combined effect of Gatwick's predicted baseline growth and the Northern Runway on awakenings (being woken up at night by aircraft noise) and the difference in the absolute sound levels within the district as a result of the NRP, which may also change over time. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Cumulative noise impacts are assessed in Section 14.11 of ES Chapter. 14. The reasons why this is done qualitatively instead of quantitatively are explained. The combined effect of Gatwick's predicted baseline growth and the Northern Runway Project on awakenings is quantified in section 7.3 of the Physiological Sleep Disturbance Assessment provided in ES Appendix 14.9.2 Air Noise Modelling [APP-172] where 2019, future baseline and future with Project awakenings are estimated. It is important to note that an awakening in this study is not the same as 'being woken up', rather it is a more subtle change of sleep state which in a healthy adult typically occurs about 20 times during an eight hour night and most of these awakenings are too short to be remembered the next morning.	ES Appendix 14.9.2 Air Noise Modelling [APP-172]	Not Agreed
2.16.2.7	Noise	The Applicant places an overreliance on limited metrics to describe and put controls on sound. The Council's view is that a range of metrics, stated for different periods, are needed to understand effects upon appropriate areas and the mitigation required. The Council also considers that there has been insufficient regard of the means as to how likely future policy changes might be taken into account in the management of air noise which could be pertinent to what can be implemented. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	All the relevant noise metrics have been modelled and reported so as to understand the effects on different areas. It is not possible to assess the effects of future policy until it is known. However, one area where the means as to how likely future policy changes might be taken into account, is to provide for, is a review of the Noise Envelope as described in the Section 6 of ES Appendix 14.9.7: The Noise Envelope [APP-177]	Section 6 of ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed
Assessment	l	1	<u> </u>	l	
2.16.3.1	Identification of significant effects regarding traffic Document Ref(s): APP-171, General	It is acknowledged that minor increases in road traffic noise is expected on Charlwood Road and Ifield Avenue. These impacts are stated as not significant but they could be if absolute levels at the properties are above the SOAEL. The Council notes that later in the construction process there is significant related activity and concern is raised that this is not accompanied by robust traffic modelling. Such uncertainly also extends to concerns around the	Charlwood Road and Ifield Avenue road links were calculated to have a greater than L _{10, 18 hr} 1 dB change in noise (minor magnitude) in the construction (basic noise level [BNL]) assessment. The greatest change modelled was 1.4dB, during the day. The noise assessment modelled the three main construction scenarios where peak levels of construction traffic noise are expected. These minor changes in noise are calculated in two out of the three scenarios in the assessment during the daytime period where the Peak Highway Traffic Management measures are in	ES Chapter 14: Noise and Vibration [APP-039]	Not Agreed



		validity of transport modelling more generally. Should the modelling need to	place and during the Peak Highway Construction is being		
		be rerun noise levels will again need to be reviewed.	undertaken, when compared to the future baseline in 2029. No		
			such changes were calculated at night-time.		
		Updated position (Deadline 1): Absolute noise levels should be provided			
		at sensitive receptors to determine whether road traffic noise levels are	DMRB states (DMRB, 3.19) that any construction traffic noise		
		below SOAEL.	impact shall constitute a significant effect where it is determined		
			that a major (greater than or equal to 5.0 increase in BNL of closest		
			public road used for construction traffic) or moderate magnitude		
			(greater than or equal to 3.0 and less than 5.0 dB increase in BNL)		
			are calculated in the following scenarios where construction		
			durations exceed: 10 or more days or nights in any 15 consecutive		
			days or nights; or a total number of days exceeding 40 in any 6		
			consecutive months.		
			DMRB also states that it is appropriate to amend the final		
			operational phase significance on noise sensitive buildings (DMRB,		
			Table 3.60) under several circumstances. In the situation where do-		
			something (i.e. with the Project) absolute noise levels are above the		
			SOAEL value, a noise change in the short term of 1.0 dB or over		
			results in a likely significant effect. However, all amendments to		
			final significance in DMRB are limited to the operational		
			assessment, and no such amendments are outlined for the		
			construction assessment as effects are temporary.		
			Nevertheless, the BNLs of road links associated with the minor		
			increases in noise on Charlwood Road and Ifield Avenue due to the		
			two construction scenarios were reviewed and are all below the		
			SOAEL value.		
24622	Noise	Despite required to do so the Applicant has refused to provide any date	Cingle mode contains have been reconsided to previously at Day.	TC Annondia	Not Agreed
2.16.3.2	Noise	Despite requests to do so, the Applicant has refused to provide any data that will help explain how people will actually experience the sound, for	Single mode contours have been responded to previously at Row 13.100 of Table 13 in Appendix 1. Seven Community	ES Appendix 14.9.2: Air Noise	Not Agreed
			Representative Locations were chosen to describe impacts in more	Modelling [APP-172]	
		example the single mode contours.	detail in paragraphs 14.9.150 to 14.9.158. These seven locations	wodening [APP-172]	
		Undeted position (Deadline 1). The Applicant is reviewing this Sect.			
		Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within	represent approximately half of the population within the 2032 Leq,		
			16 hour day 51 dB contour with the Project. ES Appendix 14.9.2: Air		
		the Joint Surrey Council's Local Impact Report.	Noise Modelling [APP-172] provides 14 tables giving the full results		
			of modelling for all noise metrics at each of these locations in the		
			central and slower transition fleet cases. Leq, 16 hour day, Leq, 8		
			hour night, N65 day and N60 night levels are provided for easterly		
			and westerly operating days, for 2019, the 2032 base case and the		
			2032 with Project case, to illustrate the changes in the noise environment that can be expected in each location.		
			environment that can be expected in each location.		
2.16.3.3	Construction Noise and	The Applicant does not justify or detail how construction will be scheduled	The need to minimise the time when part of the existing noise bund	n/a	Not Agreed
	Vibration	to ensure the impact of noise on residents is mitigated during the build-out	will be removed before the new bund and barrier are complete has		



		phases. For example, the noise barrier to the west of the runway is to be	been recognised and hence has been addressed in the construction		
		phases. For example, the noise barrier to the west of the runway is to be removed whilst construction proceeds and the runway will continue to be operational without any suitable mitigation. This will have significant impacts for Mole Valley residents and no details have been offered in relation to: • the duration and magnitude of the noise impacts while the barriers are removed; and • no information has been provided on the design and performance of proposed barriers that will be constructed. Updated position (Deadline 1): No details regarding how this is addressed in the construction noise assessment are provided. There is no commitment to secure barriers/ bunds or the timings of construction. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	been recognised and hence has been addressed in the construction programme.		
Mitigation and	I Compensation				
2.16.4.1	Measurement of ground noise to identify eligibility needs to be clear and robust Document Ref(s): APP-180	Paragraph 1.1.3 (Environmental Statement: Appendix 14.9.10 – Noise Insulation Scheme) suggests that eligibility for the NIS will be on the basis of "air noise levels predicted with the operation of the Northern Runway". However, paragraph 4.1.11 suggests that "Eligibility for the Inner Zone scheme noise insulation package due to ground noise will be established on the basis of measurements of levels of ground noise carried out after the Project is operating." This seems somewhat contradictory and all eligibility should be on the grounds of prediction to increase certainty. Updated position (Deadline 1): More detail is required regarding the provision of ground noise insulation and how monitoring would be undertaken. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Air noise insulation is based on prediction, so as to allow the insulation to be installed in good time. The worst case year, 2032 is used. The air noise insulation scheme covers the vast majority of the area that could require insulation due to ground noise, because this is much smaller. As such it is expected that noise insulation for ground noise will in the vast majority of cases be installed in good time. There are two small areas near the airport boundary specifically listed in Appendix 14.9.10 where ground noise could be at similar level of above air noise and noise measurement may be needed to confirm eligibility, these are to the north (Oakfield Cottages) and to the south of the airport (Lowfield Heath).	ES Chapter 14: Noise and Vibration [APP-039]	Not Agreed
2.16.4.2	Commencement of Eligibility Document Ref(s): Condition 18 of APP006, APP-180	It is unclear when noise insulation will be provided to residents impacted by ground and construction noise. There is insufficient and imprecise details preventing the Council from being able to understand the extent that mitigation of this type will be achieved.	Further detail on implementation of the NIS is being prepared and will be shared with the TWG.	n/a	Under discussion
2.16.4.3	The Code of Construction Practice (COCP) provides insufficient noise monitoring control and	Paragraph 5.9.15 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice), states that noise monitoring will be carried out to confirm the best practicable means. There is, however, insufficient information within the CoCP to identify areas of high noise impacts in	The CoCP provides the measures to manage and mitigate construction noise. Section 14.9 of the ES provides details of where significant adverse effects are predicted.	ES Appendix 5.3.2: Code of Construction	Not Agreed



	management of both long term work areas where (i) receptors will be exposed to intrusive noise for significant periods of time and (ii) areas of short term high impact events predicted to approach the Significant Observed Adverse Effect level (SOAEL) Document Ref(s): APP-082	advance of the construction work beginning. It is not acceptable to leave site specific monitoring to be determined in the Section 61. Policy requires adverse impacts to be mitigated and reduced. MVDC does not consider there to be sufficient support for contractors to assist them in demonstrating that they are managing and mitigating noise and other environmental impacts, such as vibration and dust (where appropriate). Updated position (Deadline 1): Responses does not address mitigation concerns. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Paragraphs 5.9.15 to 5.9.18 of the CoCP lay out the commitments to noise monitoring where adverse noise impacts are predicted. Details of the monitoring scheme will be developed once the main contractor is appointed making use of the programme of works proposed, including: baseline monitoring before works commence and impact monitoring during the works. The CoCP states as follows. In areas of low impact and daytime works a sampling approach will be adequate, and in areas of high impact or night-time works continuous monitoring may be required. It is expected that at least two continuous monitoring sites will be required for peak period of the highways works.	Practice (Doc Ref. 5.3)	
2.16.4.4	Core Working Hours are unacceptable and inadequately defined, result in unacceptable disturbance from intrusive noise Document Ref(s): APP-082	Paragraph CoCP states: "Outside the airport boundary, the core working hours will be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 07:00 to 13:00 on Saturdays." These hours are considered to be unacceptable and would result in unacceptable disturbance from intrusive noise. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	In the CoCP where these core hours are stated, the following paragraph specifically addresses the issue of noise in these shoulder hours as follows: A period of up to one hour at the beginning and end of these core working periods is anticipated to be used for start-up and closedown of activities. This will include (but not be limited to) unloading, site briefings, inspection, refuelling, maintenance and general preparation work and housekeeping works. These activities will not include operation of plant or machinery that is likely to cause a disturbance to local residents or businesses. This commitment will be specified in the Section 61 application	ES Appendix 5.3.2 Code of Construction Practice (Doc Ref. 5.3)	Not Agreed
2.16.4.5	Prevention of breaches in the Noise Envelope Document Ref(s): APP- 177	Throughout the Noise Expert Group (NEG) led community consultations and up until November 2022, the Applicant stated there would be an action level (noise limit) which would be provided to enable and guide the enforcement mechanism. This has not occurred. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	where necessary to address noise disturbance in the shoulder hour. Noted, this was the case. At that time the Luton Airport development project was specifying actions levels within its Noise Envelope control process. However, whereas the process proposed at Luton was to apply a margin to the noise contour areas that occurred in the last year, the process proposed in the Gatwick project is forward looking forecasting noise contour 5 year ahead, rather than retrospective, so will provide greater certainty that a breach in future will be avoided.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed
2.16.4.6	Night-time Noise limit Document Ref(s): Condition 14 of APP006, APP-177	The Noise Envelope does not make necessary attempts or provisions to restrict night time movements. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	The noise envelope provides limits to restrict night-time noise. The Night Restrictions that include summer and winter night movements limits are enforced by the DfT for Gatwick Airport because it is designated for the purposes of noise regulation under the Civil Aviation Act 1982. It is therefore not necessary or appropriate for the DCO to replicate this regulation.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed



2.16.4.7	Insufficient consideration of mechanisms for the prevention of breaches in the Noise Envelope Document Ref(s): Condition 14 of APP006, APP-177	It has not been possible to identify any mechanisms in the Application documents that provide a proactive plan which manage and prevent exceedances. Nor is there any detail on what proposed actions or mitigation might take place to achieve compliance in the event of a forecast breach. Currently two consecutive retrospective breaches are required before capacity restrictions are proposed. Updated position (Deadline 1): Preventative mechanisms should be covered in detail in the Noise Envelope. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	The annual Noise Monitoring and Forecasting Report will provide forecast noise contours for the next five years specifically so as to ensure GAL has planned sufficient measures where necessary to remain within the noise envelope limits. The Noise Monitoring and Forecasting Report will not be approved by the Independent Review each year unless actions are included where necessary to ensure the forecast and associated noise modelling results are within the noise envelope. During consultation with the Noise Envelope Group presentations were given as to what actions could be taken if necessary, including changing aircraft charges and introducing a Local Rule which secures noise operating criteria in relation to future released slots. See P184 of ES Appendix 14.9.9 Report on Engagement on the Noise Envelope.	ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023].	Not Agreed
2.16.4.8	Independent forecasting should involve relevant local authorities Document Ref(s): Condition 14 of APP006, APP-177	Any independent forecasting that needs to take place must ensure the involvement of relevant local authorities. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems. Updated position (Deadline 1): Forecasting is an important part of Noise Envelope compliance so should be subject to independent review. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	The air traffic forecasts made by the specialist aviation forecaster for the annual Noise Monitoring and Forecasting Report will be based on the best available information available on market trends within GAL and the airlines, so as to provide the most accurate forecast possible. It would be in no-one's interests to do otherwise as GAL would not want to face the consequences of breaching the noise envelope limits. The CAA are considered suitably qualitied to review and approve those forecasts.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed
2.16.4.9	Independent verification Document Ref(s): Condition 14 of APP006, APP-177	Any review of the air noise modelling and associated works must be independently verified. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.	In response to this suggestion, section 7.4 of the Noise Envelope requires an Independent Expert to review the noise monitoring data and processing of the data for noise modelling, every 5 years, as suggested.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Under discussion
2.16.4.10	Capacity declaration restrictions as a means of managing aircraft noise Document Ref(s): APP-177	Section 7.3 of the Environmental Statement (Appendix 14.9.7: Noise Envelope) sets out intended measures to restrict capacity declarations. However, these measures would not prevent new slots being allocated within the existing capacity. Neither are they an effective means of preventing future noise contour limit breaches, especially if a breach occurred in the previous year.	Paragraph 7.3.1 reads 'GAL shall not be permitted to declare any further capacity for additional air traffic movements from the airport where' Clearly the intention here is to disallow additional air traffic movements.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Under discussion
2.16.4.11	Prevention of breaches in the Noise Envelope Document Ref(s): APP- 177	Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the Noise Envelope. Updated position (Deadline 1): The Applicant response does not address the comment.	A technical note will be provided to the TWG providing further details of engine ground running noise levels and frequencies of occurrence at other receptor locations which demonstrates the Project will not give rise significant effects from engine ground running.	n/a	Not Agreed



2.16.4.12	Slow case fleet transition (replacing older aircraft with newer, quieter ones) is not an acceptable basis for setting the Noise Envelope Document Ref(s): APP-177	This issue has been previously raised by the Council and the Applicant. In its Issues Tracker (Application Document(s): Response to PD005), the Applicant considers this to have been resolved. MVDC does not agree and slow case transition continues to be considered unacceptable. There is no adequate comparison of future technology gains within the 2019 baseline and noise levels have been assumed to be constant within the fleet over the next ten years. Using the slow transition case, as the basis of the Noise Envelope, provides no incentive for GAL to seek faster fleet transition and secure noise and other environmental benefits. The central case should be utilised and a more proactive approach taken by the Airport. Updated position (Deadline 1): The slower case fleet results in increased noise levels in the 2029 assessment scenario and no benefits of new aircraft technology are shared with local communities. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	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 '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'. 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. The ES considers noise impacts for the range of fleet transition between the central case and slower transition case and identifies mitigation for the worst case of these, the slower transition case.	ES Appendix 14.9.5 Air Noise Envelope Background [APP- 175]	Not Agreed
2.16.4.13	Flexibility of noise contours limits accountability for airspace redesign and future aircraft technology	The Applicant is seeking the flexibility to increase noise contour area limits, depending on airspace redesign and noise emissions from new aircraft technology. Should the NRP obtain consent, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope to ensure that unacceptable alterations are contained as far as is reasonably possible. Updated position (Deadline 1): There should be no allowance for Noise Envelope limits to increase thus giving certainty to local communities on future noise levels. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	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 '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'. 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.	ES Appendix 14.9.5 Air Noise Envelope Background [APP- 175]	Not Agreed



			The Noise Envelope provides certainty for the periods which it is set in accordance with CAP1129. The noise envelope should reflect evidence of the improvements in average fleet noise performance		
			over time and should not function to prevent airlines serving changing markets or introducing new carbon-efficient aircraft. There may also be extraordinary circumstances in which it could be necessary to review the noise envelope limits upwards. These points are fully as described in Sections 6.3 to 6.7 of the Noise Envelope.		
2.16.4.14	CAA to regulate the Noise Envelope rather than relevant local authorities Document Ref(s): APP- 177	There is no mechanism for local authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope. To date, the CAA has not accepted a role regulating the Noise Envelope. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.	ES Appendix 14.9.7 The Noise Envelope [APP-177]	Not Agreed
2.16.4.15	Modelling 2019 Air Transport Movements (ATM) with 2032 fleet technology Document Ref(s): APP-177	Sensitivity testing of different growth rate scenarios (Appendix 14.9.7 The Noise Envelope) would help provide a better understanding of how noise may affect local communities in the future. The Council has consistent requested such testing to be carried out up to and including 2032, yet it has been argued that this is too far in advance to be material. The Council disagrees and this would be only eight years in the future. Furthermore, various other data has been modelled to 2032 and beyond, without issue, and it is unclear why this sensitivity testing has not been provided within the relevant Environmental Statement. Updated position (Deadline 1): Ongoing.	The ES provides forecast noise modelling for the 2019 baseline, 2029, 2032, 2038 and 2047. For each year, noise contour data is provided for primary and secondary noise metrics, for the baseline and Project case, and for two rates of fleet transition. This is sufficient to assess the likely significant effect of the project and has allowed the ES to specify the required noise mitigation in line with guidance and policy. The ES provides 48 noise contour maps for 2019, 2032, and 2038. Noise contours for 2029 and 2047 are not mapped in the ES figures because noise impacts are higher in other years and shown by the population and contour area data that is provided for these years. Contours for years mapped in the ES figures and the other years have been provided to LPAs on the TWG in the online Air Noise Viewer. Modelling of the 2019 base year movements with the predicted 2029 fleet mix has not been undertaken because this scenario will not arise because in all future years there will be some growth in traffic.	ES Chapter 14: Noise and Vibration [APP-039]	Under discussion



			The ES has considered two rates of fleet transition within the growth expected by the aviation forecasts. This is intended to help communities understand the likely significant effects of the Project. In the event growth were less, then the effects would be less than predicted by the assessments.		
2.16.4.16	Annual noise contour limits are necessary to understand the overall impacts from air traffic movements Document Ref(s): APP-177	The noise contour area limits provided 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. Use of the summer average LAeq is not representative of the intrusive noise experienced by residents impacted by aircraft noise and should be more broadly considered to be representative. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	This issue has previously been responded to at Row 13.55 of Table 13 in Appendix 1. Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements. See para 6.1.3 of ES Appendix 14.9.7: The Noise Envelope.	ES Appendix 14.9.7: The Noise Envelope [APP- 177].	Not Agreed
2.16.4.17	Failure to properly implement the Government's policy on Noise Envelopes (CAP1129) Document Ref(s): App-039	Various national aviation guidance and policy refer to an approach where there should be a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development. Sharing benefits is a fundamental part of the Noise Envelope and it should be demonstrated how the benefits of new aircraft technology are to be shared between the airport and local communities. The Applicant has failed to accept that there is any policy obligation to share technology gains with the community and this cannot be supported. In the earlier iteration of the Environmental Statement (Chapter 14: Noise and Vibration), Paragraph 14.2.44 included detail on 'Sharing the Benefits'. The submitted and revised ES has removed this contrary to relevant policy. Updated position (Deadline 1): Sharing the benefits remains part of national aviation policy. The Applicant does not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022. An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.	ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]	Not Agreed
2.16.4.18	Noise	The Council considers that the proposal will adversely affect residents of Mole Valley and beyond due to an increase in exposure to aircraft noise during the day and night. The Council disagrees with the Applicant's interpretation of national policy in respect of aviation noise and this affects the approach and work which has been carried out by GAL to support its application. Concerns relate, but are not limited, to:	The ES identifies approximately 80 properties where significant noise effects are predicted for the daytime, and 30 of the same properties for night-time, the majority of which are in MVDC, and the ES specifies noise insulation to address these. Elsewhere noise increase are not predicted to create significant noise effects.	ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [AS-023]	Not Agreed



		 the derivation of the proposed noise envelope limits; the identification and extent of various insulation zones (areas requiring mitigation measures); the approach to future mitigation and management of aviation noise, particularly at night and in the period from 06:00 to 07:00hrs; intrusive adverse noise impacts from ground operations and taxiing movements; and embedded issues with the consultation process with the community and local authorities which has resulted in poor understanding and engagement on noise envelope constraints and technical detail. Updated position (Deadline 1): The ES identifies residual significant effects and is not policy compliant. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report. 	GAL notes the Council's disagreement and would be interested to understand how the Council interpret national policy and which specific parts of GAL's interpretation it disagrees with. GAL has consulted with the TWG since August 2021, explaining our proposed methodology and emerging findings and approach to mitigation. While it is not wholly clear what aspect of policy MVDC refer to, we note that policy on sharing the benefits has been discussed at the Noise Envelope Group and our interpretation, as discussed in summer 2022 is recorded in ES Appendix 14.9.9: Report on Engagement on the Noise Envelope including in pages 165 to 175.		
2.16.4.19	Noise Envelope	There are significant concerns in terms of the approach taken to Noise Envelope (NE) (CAP1129) matters and the process for the creation of a NE has not sufficiently involved the local authorities or the community groups nor has it been adequately explained. Furthermore, it has not properly taken into consideration views presented through the preapplication stage and consultation. In short, despite comments, advice and questions, the Applicant has chosen the worst environmental options which is likely to have the largest environmental impacts as the basis for the NE leaving too much scope for detrimental outcomes.	The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. ES Appendix 14.9.9 Report on Engagement on the Noise Envelope explains that a total of 12 two-hour meetings dedicated to the Noise Envelope process were held between 26 May and 11 October 2022 between the airport and stakeholders. A summary of wider consultation undertaken on the Noise Envelope since 2019 is also provided at Section 4.2 of Appendix 14.9.7 The Noise Envelope.	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed
2.16.4.20	Noise Envelope	The Council has observed that in the case of the Luton airport expansions project (PINS Reference: TR020001) there is an agreed process which is managed by the Environmental Scrutiny Group and requires that discussions which determine NE matters should be independently chaired by a suitably qualified person from within the UK aviation sector. It also requires that they should have agreed mechanisms to challenge forecasts and validate modelling and measurement processes and that all costs should be funded by the promoter. This has not been the case with the NRP. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.	ES Appendix 14.9.7: The Noise Envelope [APP-177] ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]	Not Agreed



2.16.4.21	Noise Envelope	The Council considers that the Noise Envelope, as presented, is not fit for	The host local authorities will be provided with the annual	ES Appendix	Not Agreed
2.10.4.21	Noise Envelope	purpose because it provides little incentive to stabilise noise levels let alone reduce them. It provides no adequate review and control mechanism or local accountability and no meaningful penalties or sanctions if there is a failure in compliance. Updated position (Deadline 1): The Noise Envelope is not policy compliant nor fit for purpose. Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.	14.9.7: The Noise Envelope [APP-177] ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]	Not Agreed
2.16.4.22	Construction Noise and Vibration	The NRP places an undue reliance on Significant Adverse Observed Effects levels and the Section 61 process to manage construction noise impacts. There needs to be more information to assess the likely duration and provide suitable mitigation and monitoring of specific adverse noise impacts from construction work at sensitive locations where extended periods of disturbance are to be reasonably anticipated. Updated position (Deadline 1): A S61 allows for significant effects to occur and cannot be relied upon to secure mitigation. The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.	Section 14.9 of the ES provides a detailed account of the expected construction noise impacts and mitigation likely to be needed in specific areas of work so that the likely mitigation is understood ahead of the Section 61 application stage. The assessment takes due account of SOAEL as required in policy and guidance. Table 14.9.4, over 11 pages, describes the mitigation likely to be required and the durations expected in each area.	ES Chapter 14: Noise and Vibration [APP-039]	Not Agreed
2.16.4.23	Construction Noise and Vibration	It is recognised that the Construction and Transport Management Plans will be essential to understanding the mitigation of impacts and that these would be forthcoming at a later stage. However, it is considered that draft management plans should be collaboratively prepared with local and highways authorities and commenced swiftly so that the information is available for consideration during the examination. Should the DCO be approved in the absence of management plans, implementation could fall short of what is necessary and appropriate. Updated position (Deadline 1): Ongoing.	GAL has been engaging with local authorities through TWGs on the proposed approach to construction and transport management plans. GAL is taking into consideration comments made on the detail at the appropriate stage in the process. We welcome any further detailed comments in respect of the DCO submission documents.	Draft DCO (Doc Ref. 2.1)	Under discussion
2.16.4.24	Construction Noise and Vibration	The Applicant's proposals for mitigating aircraft noise overly relies on the noise insulation of properties. The proposals are too narrowly defined and should not solely be based on Leq. The extent of the noise contours, which would enable decisions to be made on whether someone qualifies for financial assistance for sound insulation measures, should be based on	Section 3 of ES Appendix 14.9.2 Air Noise Modelling summarises the range of mitigation measures that will be used to minimise noise impacts, of which noise insulation in only one. Leq 16 hr and Leq 8 hour night are considered the most appropriate metrics to base the noise insulation scheme on. GAL has discussed the basis of the noise insulation scheme with the TWG. For single mode Leq	ES Appendix 14.9.2 Air Noise Modelling [APP-172]	Not Agreed



	1			T	Т
		single-mode contours and not standard-mode contours as the Applicant	contours, please see our response provided in Rows 13.4 and		
		proposes.	13.100 of Table 13 in Appendix 1.		
		Updated position (Deadline 1): The Applicant, in reviewing this SoCG, is			
		referred to the Council's comments and supporting mitigation tables within			
		the Joint Surrey Council's Local Impact Report.			
		the Joint Gurley Godinar's Local Impact Report.			
2.16.4.25	Construction Noise and Vibration	Noise insulation will often result in properties having to have sealed windows and/or relying on mechanical ventilation, such as air conditioning.	The Noise Insulation Scheme will not seal any windows. Overheating has been addressed by the provision of acoustic	ES Chapter 14: Noise and Vibration	Not Agreed
		Therefore, the Applicant must make provision for overheating assessments and related mitigation works to properties due to the increased risks that	ventilators to all rooms with acoustic insulation. Further details have been developed on the specification of these ventilators and	[<u>APP-039</u>]	
		this will occur. Given the duration of the project and the magnitude of harm	this will be provided in the technical note on implementation of the		
		from the high levels of intrusive noise, the ventilation requirements should	scheme and shared with the TWG.		
		be assessed in accordance with the changing future climate circumstances	Potential changes to the assessment as a result of climate change		
		which are likely to exacerbate the risks of overheating further and must be	are reported in Section 14.10 of ES Chapter 14: Noise and		
		recognised now, as far as is practicably possible.	Vibration [APP-039].		
		Updated position (Deadline 1): Overheating is not addressed by acoustic			
		ventilators, which only introduce fresh air and do not have any cooling capability.			
		The Applicant, in reviewing this SoCG, is referred to the Council's			
		comments and supporting mitigation tables within the Joint Surrey			
		Council's Local Impact Report.			
2.16.4.26	Construction Noise and	Given the various negative impacts, the Council is concerned that there is	The Section 61 application and approval by the local authority will	n/a	Not Agreed
	Vibration	no offer of compensation for people affected by the nuisance they are likely	give the local authority opportunity to ensure best practicable		
		to experience for which they would otherwise have common law rights to	means are used by the contractor to minimise noise impacts. The		
		apply for.	DCO does not override common law rights to compensation for nuisance.		
		Updated position (Deadline 1): A S61 allows for significant effects to			
		occur and cannot be relied upon to secure mitigation.			
		The Applicant, in reviewing this SoCG, is referred to the Council's			
		comments and supporting mitigation tables within the Joint Surrey			
		Council's Local Impact Report.			
2.16.4.27	Construction Noise and	Fundamentally, the Council lacks confidence in the Applicant's plans to	The ES lays out and commits to an effective means of managing	ES Chapter 14:	Under discussion
	Vibration	deliver and implement a meaningful noise control regime that takes into	the negative impacts of noise during construction that has been	Noise and Vibration	
		account the needs of the local communities. This view is informed by the	tried and tested on other projects.	[APP-039]	
		Applicant's ineffective consultation process and the challenges MVDC			
		faced when trying to work proactively with the Applicant on noise related			
		matters.			
Other					



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

2.17. Planning and Policy

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

Table 2.17 Statement of Common Ground – Planning and Policy Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.17.1.1	Quality of documentation and impact on PADSS Document Ref(s): General	The Applicant has consistently demonstrated an unwillingness to fully address the issues raised and the submitted documents are difficult to interpret in many cases including for the topics of noise, climate, transport and base case. There is a consistent lack of transparency with regard to key issues and this will necessitate a more fluid/iterative approach to how the Council will highlights principal areas of disagreement and engages in the examination process. For example, something which is not currently	The Applicant has consistently engage with the LAs through the pre-application consultation stage, as detailed in the Consultation Report and demonstrated through the application's acceptance for Examination by the Planning Inspectorate. Annexes A and C of the Consultation Report bring together the Applicant's responses on a topic-by-topic basis to matter raised response to the 2021 and 2022 consultation stages.	Consultation Report [APP-218], Consultation Report Annex A, Autumn 2021 Consultation Issues Tables [APP-	No longer pursuing.
		on the PADSS may need to be added as discussions evolve. Equally, an issue may come off the list where clear explanation and discussion resolves matters. Updated position (Deadline 1): The Council included this as a general point which reflected challenges in the process at the time of compiling the	Since acceptance, the Applicant has continued to engage through the presentation of a series of Issues Tables/Trackers, such as this.	219] Consultation Report Annex B, Autumn 2021 Consultation Consultee response	
		point which reflected challenges in the process at the time of compiling the PADSS. It is recognised that some of the key and requested information has become available since then and should continue to be supplied during examination, alongside discussion around specific issues.	Please may MVDC also clarify if it has any additional queries or concerns on the specific topic referenced (i.e. noise, climate transport and 'base' case) that is not covered by its RRs and PADSS (and therefore these Issues Tables).	Consultation Report Annex C, Summer 2022, Consultation Issues Tables [APP- 221]	
2.17.1.2	Adequacy of Consultation	It is noted that the Examining Authority (ExA) has determined that the Applicant met the basic consultation requirements set by the Planning Act 2008. However, the Council maintains that the failings in terms of public and local authority engagement continue to present obstacles to the application. The Council is of the view that, had the process been carried out more thoroughly, many of the issues raised in this Representation would have been likely to have been resolved. Updated position (Deadline 1): The Council accepts that the ExA has made its decision.	The Consultation Report describes the pre-application consultation and engagement that was undertaken in respect of the Project. The application has since been accepted for Examination by the Planning Inspectorate, in which it was confirmed that the Applicant has complies with the pre-application procedure requirements under the Planning Act 2008.	Consultation Report [APP-218]	No longer pursuing.
2.17.1.3	Local Plan data	The Council does not consider that the most up to date Local Plan position and information for Mole Valley has been had regard to an outdated position for the emerging Mole Valley Local Plan exists within the Environmental Statement (ES) on Population and Housing Effects (Appendix 17.9.3, APP-201). MVDC completed the public hearing stage of its examination by the end of October 2022, and revised trajectory and			Awaiting Applicant response





land supply information was available to the Applicant to of the DCO submission within a more than adequate time. While the details are unlikely to make a material difference submitted DCO in their own right, inaccuracies for other a not be ruled out and could necessitate changes. The App	eframe. ce to the authorities should blicant should
review the details and accuracy of the ES and correct rele which will have informed modelling and forecasts for hous population data.	



- 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
There are no is	ssues relating to Project Eleme	ents and Approach to Mitigation within this Statement of Common Ground.			



2.19. Socio-Economics and Economics

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline	·		•	1	•
There are no	issues relating to the baseline	for this topic within this Statement of Common Ground.			
Assessment	t Methodology				
2.19.2.1	Overstatement of the wider,	The methodology used to assess the catalytic employment and GVA			Awaiting
	catalytic, and national level	benefits of the development is not robust, leading to an overstatement of			Applicant
	economic benefits of the	the likely benefits in the local area. The national economic impact			response – it is
	NRP	assessment is derived from demand forecasts which are considered likely			acknowledged
		to be optimistic and fails to properly account for potential displacement			that this may be
	Document Ref(s): APP-042, APP-245,	effects, as well as other methodological concerns.			addressed in the joint authorities
	APP-250, APP-251,	The impact methodology needs to properly account for the specific			SoCG.
	APP-252	catchment area and demand characteristics of each of London's airports			
		to ensure that the catalytic impacts of airport growth are robustly			
		identified. The national economic impact assessment should robustly test			
		the net impact of expansion at Gatwick having regard to the potential for			
		growth elsewhere and properly account for Heathrow specific factors,			
		such as hub traffic and air fares.			
A = = = :	1		•	•	
Assessment					
		ent for this topic within this Statement of Common Ground.			
There are no		ent for this topic within this Statement of Common Ground.			
There are no	issues relating to the assessme	ent for this topic within this Statement of Common Ground. It is necessary to understand more about funding and how potential			Awaiting
There are no Mitigation ar	issues relating to the assessmend Compensation				Awaiting Applicant
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential			1
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the			Applicant
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the			Applicant
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is			Applicant
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for			Applicant
There are no Mitigation ar	issues relating to the assessmend Compensation	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant			Applicant
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans.			Applicant response
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as			Applicant response Awaiting
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social			Applicant response Awaiting Applicant
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is			Applicant response Awaiting Applicant
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is misleading. The Applicant should make it clear what is already happening			Applicant response Awaiting Applicant
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is misleading. The Applicant should make it clear what is already happening and what 'additionality' will happen only as a result of the NRP for public			Applicant response Awaiting Applicant
There are no Mitigation ar 2.19.4.1	nd Compensation ESBS ESG	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans. The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is misleading. The Applicant should make it clear what is already happening and what 'additionality' will happen only as a result of the NRP for public benefit in order to show transparency.			Applicant response Awaiting Applicant response



Horsham and Crawley. The Employment, Skills and Business Strategy (ESBS) (Environmental Statement Appendix 17.8.1, APP-198) for the NRP is based upon reasonable objectives and themes, but lacks 'SMART' focus. It sets out hypothetical outputs which arise from arguably undeliverable interventions and is not currently considered to demonstrate a realistic strategy for improvement.

The Council would expect to see more details of deliverable and realistic activities and initiatives linked to people living in each local authority. The baseline should also aim to identify specific minority and/or marginalised groups of people and communities as well as pockets of deprivation so that these areas can be targeted, where possible.

Primarily, the ESBS is based upon on what could be done/achieved and not what will. The strategy is not supported by clear costings or resourcing considerations, which again lessens confidence that the outputs are achievable and otherwise essential to making the NRP successful.

Other

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



2.20. Traffic and Transport

2.20.1 **Table 2.1** 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	Parking	As a general view, the Council does not consider the associated car parking proposals for the NRP to be robust and does not provide sufficient assurance that off-site and illegal parking activities will be lessened. There is a clear need for a detailed Parking Strategy that carefully considers and justifies the car parking requirements in the context of ambitious modal shift targets and surface access matters. The success, availability and costs of car parking will influence any modal shift and the collaborative and timely preparation of a suitable Parking Strategy would be welcomed to ensure detailed discussions on these matters can be explored and resolved. Updated position (Deadline 1): The Council welcomes further information.	Further information is being prepared on the justification for the proposed number of car parking spaces. This will be shared with MVDC in due course. Updated position (Deadline 1): A Car Parking Strategy (Doc Ref. 10.5) has been submitted at Deadline 1.	Car Parking Strategy (Doc Ref. 10.5)	Under discussion
Assessment	: Methodology				
2.20.2.1	Parking	In addition, the Council would like clarity regarding the calculations for parking spaces as it is not clear how they have been derived having undergone numerous changes since the preapplication process commenced. It would appear that there has been a reduction in proposed spaces from those set out in the Summer 2022 Consultation, yet there is no evidence to justify how and why this has changed. The Applicant must provide additional details, calculations and justifications for this. Updated position (Deadline 1): The Council welcomes further information.	Further information is being prepared on the justification for the proposed number of car parking spaces. This will be shared with MVDC in due course. Updated position (Deadline 1): A Car Parking Strategy (Doc Ref. 10.5) has been submitted at Deadline 1.	Car Parking Strategy (Doc Ref. 10.5)	Under discussion
Assessment		<u> </u>			
2.20.3.1	Inadequate rail strategy Document Ref(s): APP-258	The Council considers that the Applicant's assertions that "no significant increase in crowding on rail services is expected as a result of the Project," (Transport Assessment, paragraph 9.8.7) to be erroneous and has disregarded its own evidence which shows an increase in numbers and crowding. The proposals are consistently contradictory and does little for meeting expressed targets for modal shift away from the private car, despite making it clear that that the Gatwick Stations Upgrade project is intended to make rail travel to and from the airport more attractive. With such a unique and large scheme, there are real opportunities for economic and environmental benefits linked to increasing rail travel. No	The Gatwick Station project is included in the strategic modelling and therefore taken into account in the trips, the resulting mode share and the impact assessments undertaken on the rail network, Gatwick Station and highway network. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The assessment highlights that rail services are typically busiest northbound towards London in the morning peak, and southbound towards Gatwick in the afternoon peak. Standing capacity would	Chapters 9 and 10 of Transport Assessment [AS- 079]	Under discussion



		sufficiently beyond the NRP boundary to achieve this. It is not considered that the Applicant's proposals will be in the public benefit and does not make the most of the linkages and available networks. Instead it relies on existing plans to accommodate passenger numbers and does not seek to fund schemes on the network at stations such as East Croydon and Dorking Deepdene which could affect a notable change for the benefit of the airport and wider economy. With such a limited rail offer, accompanying road transport modelling must be updated to be more realistic about the levels of car use that will be more likely.	increases in patronage related to the Project will be in the counterpeak direction.		
2.20.3.2	Roads	MVDC is prevented from being able to accept the Applicant's position that there will be little or no adverse impacts on the highway network relevant to wider Mole Valley and the SRN beyond the Longbridge Roundabout (APP-258), due to concerns over the modelling undertaken. As presented, there is a lack of sensitivity testing in the modelling regarding airport capacity and the different levels of uptake for alternative travel methods. There also appears to be more focus on the impacts in the Crawley area which underplays how areas, such as Horley, and Surrey networks will be affected, especially given the multiple routes which can be used to access the M25.	The committed mode shares are the result of the interventions tested in the strategic model. This is set out in Chapter 7 of the Transport Assessment. The SACs sets out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach. 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.	Transport Assessment [AS-079] Annex B: Strategic Transport Modelling Report of the Transport Assessment [APP-260]	Under discussion
Mitigation and 2.20.4.1	d Compensation Inadequate public transport provision to effect modal shift Document Ref(s): APP-258	The submitted application provides insufficient public transport provision for Mole Valley district as a whole and especially for the most populated areas in the north of the district in Dorking, Leatherhead and Ashtead. The approach to coaches, buses and support for local commuters is not necessarily deliverable and will not be effective and instead will be detrimental to the wider community and businesses. Additional public transport provisions to serve Mole Valley need to be provided and information on funding and agreements with relevant operators shared. It is the Council's view that a notable modal shift to sustainable transport mechanisms is unachievable and not based on realistic or reasonable assumptions and forecasting. For such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.	The Surface Access Commitments (SAC) 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 SAC represents the position we are committing to achieve, based on our modelling of mode choice and transport network operation. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares. The SAC sets out that 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]	Under discussion
2.20.4.2	Roads	Concerns regarding the works to the Longbridge roundabout are also raised, with particular regard to and how the construction works will be mitigated. In particular, the diversion of pedestrian and cycle access	The proposals for construction phasing at Longbridge Roundabout, including diversions of pedestrian and cycle routes during construction, these are described for this preliminary design stage	Environmental Statement - Appendix 5.3.1	Under discussion



		across the roundabout are not considered to be sufficient. The level of disruption should not be underestimated and proper diversions, clear pathways and other public safety measures need to be reconsidered and implemented accordingly. More detail and clarity around mitigation measures should be provided.	in ES Appendix 5.3.1 Buildability Report - Part B, Part 1, with traffic management stages illustrated in Appendix A - Surface Access Construction Stage Sketches. The preliminary proposal has identified the use of diversions, a temporary utility/pedestrian bridge to maintain access around the south side of the works and includes hoardings to separate pedestrian and cycle users from the works. GAL will continue to engage with National Highways and Local Highway Authorities in developing the construction phasing and buildability proposals for the scheme as part of technical engagement expected to form part of the development of the detailed design of the scheme proposals after the DCO has been granted.	Buildability Report Part B, Part 1 [APP- 080].	
2.20.4.3	Public Transport	Regarding buses, the proposed frequencies for the enhanced services would be paid for by the Sustainable Transport Fund, which is set out in GAL's current Section 106 Agreement. However, there is insufficient information on whether such funding is actually available. While contributions to the public transport network is welcomed, none of the limited provisions for Mole Valley, would serve beyond the rural south of the district. In terms of coaches, Route 3 via Oxshott is no longer in the NRP and none of the now proposed coach routes would directly serve Mole Valley. The proposals are counterproductive to securing real benefits of public transport and maintaining viability of those services.	Further information is being prepared on the mechanism for supporting the bus and coach initiatives, including sources of funding such as the Sustainable Transport Fund. The 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 interventions we propose in the SAC 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. The SAC sets out that 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]	Under discussion
2.20.4.4	Public Transport	For local residents who commute to Gatwick either to work at the airport or to access the train station, the Local Commuter Zone scheme has proven helpful. However, there are no plans to expand the current zone in response to the NRP. In the absence of a comprehensive public transport offer, it stands to reason that there will continue to be a reliance on private vehicles, impacting on the Applicant's commitments to altering modal share. It seems unreasonable to provide insufficient public transport options, while also failing to support those workers and commuters who are forced to travel by car.	GAL is committed to the mode shares set out in the SAC. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application, as set out in Chapter 7 of the Transport Assessment. The SACs set out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach. Based on the assessment contained in the Application, no further mitigation is required.	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Under discussion
2.20.4.5	Public Transport	Compounding the Council's view that local workers are not being supported by the Application is the lack of provision for 'out of hours' workers and/or those catching early or late flights. While it is	The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The need for early morning and evening services is recognised by GAL and	Chapter 11 of Transport	Under discussion



		acknowledged that there is a limit to when buses and trains can operate more generally, there has been no consideration of whether employee minibuses or pocket park and rides could be of benefit. Once again, for such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.	rail and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as the potential for strengthening weekend services.	Assessment [AS-079]	
2.20.4.6	Rail	The Council considers that rail-based provisions intended to offset the development and serve passengers and commuters are not extensive enough to provide real public and economic benefit. Despite the Applicant's assertions that the planned Gatwick Station upgrades and rail project will provide suitable rail interventions, a large amount of this work relates to improving on site facilities and not necessarily the frequency and efficiency of services. While some increases are planned to take place (2-3 extra peak hour trains and 10 extra off-peak trains per hour), this is scheduled to happen regardless of the NRP and therefore is not a direct result of it.	GAL is committed to the mode shares set out in the SAC. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application, as set out in Chapter 7 of the Transport Assessment. The SACs set out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach. Based on the assessment contained in the Application, no further mitigation is required. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The need for early morning and evening services is recognised by GAL and rail and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as the potential for strengthening weekend services.	ES Appendix 5.4.1: Surface Access Commitments [APP- 090] Chapter 11 of Transport Assessment [AS- 079]	Under discussion
2.20.4.7	Rail	The Council considers the Applicant to have been short sighted on rail matters and not to have looked at wider strategic opportunities that would reap rewards for the airport. Two key examples are East Croydon Station and Dorking Deepdene.	A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the Transport Assessment and the full set of rail data is included in ES Appendix 12.9.2 Rail Passenger Flows. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation.	Chapter 9 of Transport Assessment [AS-079]	Under discussion
2.20.4.8	Rail	In the case of East Croydon, the Applicant has acknowledged in its Transport Assessment (APP-258), the significance of the station as part of the rail network. However, it underplays the importance of necessary upgrades to East Croydon Station and the Windmill (Selsdon) Junction, both of which present obstacles to increasing capacity and access into and out of London and the wider Brighton Line via Gatwick. While Paragraph 9.4.22 recognises the additional trains that improvements could bring to Gatwick, it also accurately notes that there is no current funding commitment for the works (paragraph 9.4.21), which have been on Network Rail's future plans for some time, so the works remain undeliverable. Given the acknowledged benefits these upgrades could bring to both the airport and wider local economy, the Council is unclear why the NRP has not sought to support and contribute funding to these works, further offsetting its impact and actually delivering notable rail improvements for the airport.	A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the Transport Assessment and the full set of rail data is included in ES Appendix 12.9.2 Rail Passenger Flows. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation.	Chapter 9 of Transport Assessment [AS-079]	Under discussion



	Rail	For Dorking Deepdene, MVDC notes that it is proposed to increase	The assessment for the Project shows that there is no significant	Transport	Under
		services on the North Downs Line from 1 to 2 trains per hour in the	adverse impact on rail services which requires mitigation.	Assessment [AS-079]	discussion
		forecast models. However, there is little regard to the station which	Paragraphs 9.6.4 to 9.6.5 of the Transport Assessment set out the		
		currently suffers from a deteriorating structure and facilities and poor	impact of the Project on the North Downs Line.		
		accessibility issues, all of which, if remedied, would greatly increase rail			
		usage. This opportunity has been overlooked and the Applicant should			
		commit to exploring investment to resolve accessibility issues at Dorking			
		Deepdene and more innovative solutions to relevant stations elsewhere			
		on the feeder network for the airport. GAL is also well placed to widen			
		these conversations with external stakeholders to secure delivery.			
.20.4.10	Rail	Increasing the rail offer has no negative effects on the NRP. Instead, it	The Surface Access Commitments document presents the mode	ES Appendix 5.4.1:	Under
		assists with a securing positive modal shift away from private cars for	shares and interventions GAL are committing to achieve, based on	Surface Access	discussion
		which GAL is responsible. With these comments in mind and clear issues	our modelling of mode choice and transport network operation. The	Commitments [APP-	
		relating to the validity of rail-based claims, it is necessary for the Applicant	rail assessments contained in the Application show that there is no	<u>090</u>]	
		to carry out additional modelling which places less reliance on non NRP-	significant adverse impact on rail services which requires mitigation.		
		related rail improvements and usage and which more closely reflect what			
		is more likely to happen.			
.20.4.11	Rail	Due to the lack of early and deliverable commitments to modal shift and	Commitments to modal shift and interventions to encourage	ES Appendix 5.4.1:	Under
		sustainable transport options, waiting for firmer proposals through the	sustainable travel patterns are set out in the Surface Access	Surface Access	discussion
		Airport Surface Access Strategy (ASAS) would not be beneficial and	Commitments and will frame the preparation of a future ASAS in	Commitments [APP-	
		conversations regarding all modes of public transport should take place	due course.	090]	
		during examination.			
.20.4.12	Parking	MVDC welcomes funding commitments to support local authority	Further information is being prepared on the application of the	ES Appendix 5.4.1:	Under
		enforcement actions in relation to off-airport parking but would like to know	funding measures in support of the Surface Access Commitments.	Surface Access	discussion
		the levels of support and specific details on what this funding will and will		Commitments [APP-	
		not apply to. Through the refinement of the S106 and other funding		090]	
		discussions, this can be clarified. However, the Applicant must already			
		have an idea of such costs and so should be able to make these available			
		to local authorities enabling the discussions to commence swiftly.			
		to local authorities enabling the discussions to commence swiftly. Updated position (Deadline 1): The Council welcomes further			
ther		Updated position (Deadline 1): The Council welcomes further			

There are no other issues relating to Traffic and Transport within this Statement of Common Ground.



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
There are no is	There are no issues relating to Waste and Materials in this Statement of Common Ground.				



2.22. Water Environment

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

Table 2.22 Statement of Common Ground – Water Environment Matters

Reference Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline				
There are no issues relating to the b	paseline for this topic within this Statement of Common Ground.			
Assessment Methodology				
There are no issues relating to the a	assessment methodology for this topic within this Statement of Common Ground.			
Assessment				
There are no issues relating to the a	assessment for this topic within this Statement of Common Ground.			
Mitigation and Compensation				
2.22.4.1 Water	The Council wishes to highlight that local officers have observed the water	Hydraulic modelling undertaken to inform the Flood Risk	ES Appendix 11.9.6:	Under
	level just a few inches below the bridge soffit at Longbridge Roundabout,	Assessment demonstrates that the Project would not increase peak	Flood Risk	discussion
	where there is a culmination of water sources from the River Mole, the	water levels in the River Mole.	Assessment [APP-	
	Gatwick stream and a discharge canal. The Applicant has suggested that		<u>147</u>]	
	the peak flow rate at this location, pre and post construction, will remain	The pre-existing risk of debris blocking any of the local		
	the same but that the discharge will be for a longer period of time and	watercourses would not b2e altered by the Project. Therefore		
	therefore unlikely to overwhelm the bridge. However, concerns are raised	should a watercourse blockage occur, the Project would not		
	that this will only stand if there is no obstruction to the flow within the	exacerbate subsequent effects.		
	watercourse downstream of this area. The Council requests more clarity			
	on how potential obstructions will be prevented or mitigated.	The baseline River Mole hydraulic model has been reviewed and		
		accepted by the Environment Agency.		
Other				
There are no other issues relating to	o this topic within this Statement of Common Ground.			



3 Signatures

3.1.1 The above SoCG is agreed between the following:

Duly authorised for and on behalf of Gatwick Airport Limited, The	Name
Applicant	Job Title
	Date
	Signature
Duly authorised for and on behalf of	Name
Mole Valley District Council	
	Job Title
	Date
	Signature



Appendix 1: Record of Engagement Undertaken

Date	Form of Correspondence	Details
13 February 2019	In-Person Meeting	TWG on DCO Application
7 March 2019	In-Person Meeting	NRP update given to Gatwick Officers Group
8 May 2019	In-Person Meeting	TWG on NRP update
5 June 2019	In-Person Meeting	NRP update given to Local Authorities Gatwick Officers Group
20 August 2019	In-Person Meeting	TWG on Land Environment
21 August 2019	In-Person Meeting	TWG on Surface Access and Transport
28 August 2019	In-Person Meeting	TWG on Air Quality, Carbon and Climate Change, and Major Accidents and Disasters
28 August 2019	In-Person Meeting	TWG on Economics and Employment
29 August 2019	In-Person Meeting	TWG Meeting on Noise
3 September 2019	In-Person Meeting	Technical Officers Group Meeting
18 September 2019	In-Person Meeting	Health Stakeholder Group 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
		TMC as Air Coults
13 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
13 December 2023 15 December 2023	=	TWG on Air Quality TWG on Transport (Post-COVID Modelling) TWG on Noise



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