



# Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Surrey County Council

**Book 10**

VERSION: 1.0

DATE: MARCH 2024

Application Document Ref: 10.1.8

PINS Reference Number: TR020005

## Table of Contents

<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>Current Position</b>	<b>5</b>
2.1.	Agricultural Land Use and Recreation	5
2.2.	Air Quality	8
2.3.	Capacity and Operations	9
2.4.	Climate Change	10
2.5.	Construction	15
2.6.	Cumulative Effects and Interrelationships	19
2.7.	Draft DCO and Explanatory Memorandum	20
2.8.	Ecology and Nature Conservation	36
2.9.	Forecasting and Need	40
2.10.	Geology and Ground Conditions	41
2.11.	Greenhouse Gases	42
2.12.	Health and Wellbeing	46
2.13.	Historic Environment	49
2.14.	Landscape, Townscape and Visual	50
2.15.	Major Accidents and Disasters	54
2.16.	Noise and Vibration	55
2.17.	Planning and Policy	73
2.18.	Project Elements and Approach to Mitigation	74
2.19.	Socio-Economics and Economics	76
2.20.	Traffic and Transport	85
2.21.	Waste and Materials	99
2.22.	Water Environment	100
<b>3</b>	<b>Signatures</b>	<b>102</b>
	<b>Appendix 1: Record of Engagement Undertaken</b>	<b>103</b>

## 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 Surrey County Council. A summary of the meetings and correspondence that has taken place between the parties is detailed in **Appendix 1** of this document.
- 1.1.6 The engagement between the parties across the breadth of matters is ongoing. Therefore, the SoCG is an evolving document and the detailed wording within it is still being discussed in detail between the parties. Future iterations will be submitted at each deadline; and both parties reserve the right to supplement the matters identified as discussions progress, to ensure it is comprehensive and up to date.
- 1.1.7 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached, and is presented in a tabular form. This SoCG does not seek to replicate information that is available elsewhere, either within the Application and/or Examination documents, referring out where

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

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

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

## 2 Current Position

### 2.1. Agricultural Land Use and Recreation

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic in this Statement of Common Ground.					
<b>Assessment Methodology</b>					
There are no issues relating to the assessment methodology for this topic in this Statement of Common Ground.					
<b>Assessment</b>					
2.1.3.1	Impact on agricultural land	<p>The dDCO would allow the permanent acquisition of c. 2.25 acres of agricultural land to facilitate Work Nos. 37 (Works associated with the Longbridge Roundabout junction) and 40 (Works associated with land to the north east of Longbridge Roundabout). If development consent is granted this will result in the loss of agricultural land, which has been identified as potentially suitable for Biodiversity Net Gain purposes.</p> <p><b>Updated position (Deadline 1):</b> Discussions ongoing.</p>	<p>Paragraphs 19.9.10 and 19.9.13 of ES Chapter 19 Agricultural Land Use and Recreation assess the effect of the loss of approximately 0.9ha of agricultural land from the Gatwick Dairy Farm land holding. Paragraph 19.9.13 states that:</p> <p><i>“The loss of approximately 0.9 hectares from Holding 5, for highway improvements and environmental mitigation works would affect an area within a single field of a larger tenanted landowner but the current livestock-based operation would not be jeopardised by this limited loss of land and there would be no severance of land from the remaining area of the holding.”</i></p>	<b>ES Chapter 19 Agricultural Land Use and Recreation</b> [APP-044]	Under discussion
2.1.3.2	Impact on open space	<p>Replacement open space will be provided at Gatwick Dairy Farm. It is not clear what site selection process was adopted to determine why this is the most appropriate location for replacement open space. By its nature, open space should be accessible and beneficial to local communities. The proposed open space would sit between River Mole to the east and agricultural land to the west. It is not clear how this will benefit local communities, particularly since, by article 40(1) of the dDCO, the replacement open space land will not be provided until some time after the open space land has vested in GAL.</p> <p><b>Updated position (Deadline 1):</b> Discussions ongoing.</p>	<p>The construction of the highway improvement works at Longbridge roundabout to enable the roundabout to have a slightly larger diameter and to accommodate wider circulating lanes, enhanced active travel infrastructure, improved exit and entry lanes, and drainage attenuation would affect land that eventually forms part of the replacement open space or where proposed maintenance and footpath accesses to the open space would be provided.</p> <p>It would therefore not be possible to establish and provide access to the open space proposed in advance of the highway works. However, the location of the works on the southern edge of the existing Church Meadows would not restrict the continued use of the main area of Church Meadows, during this period, albeit within a slightly reduced area.</p> <p>The Statement of Reasons in paragraphs 10.1.9 – 10.1.26 explains that:</p>	<p><b>Statement of Reasons</b> [AS-008]</p> <p><b>4.8.1 Surface Access Highways Plans – General Arrangements – For Approval</b> [APP-020]</p>	Under discussion

			<p>10.1.19 <i>The proposed areas of the replacement open space significantly exceed the area of public open space permanently lost. In total, approximately 1.95 ha of replacement land would be provided compared to a loss of approximately 1.16 ha. This provides an increase of approximately 0.79 ha (68%) of open space available to local communities.</i></p> <p>10.1.20 <i>The areas of replacement open space provided greatly exceed in quantity the land permanently acquired from each of Church Meadows.... In Church Meadows a loss of 0.13 ha is replaced by 0.52 ha.</i></p> <p>10.1.21 <i>The proposed locations of the areas of replacement open space are the closest available parcels of land to those areas that would be permanently lost.</i></p> <p>10.1.23 <i>The areas of replacement open space would be available to the communities that the existing open space currently serves, including local residents, airport staff and visitors in locations as close as possible to the current provision.</i></p> <p>10.1.25 <i>The replacement open space at Church Meadows is currently used to support a livestock-based farming enterprise. The current grassland use of the replacement land would enable the early establishment of a usable and attractive space, similar to the existing area of Church Meadows. The implementation of planting proposals in accordance with the principles set out in the ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) would further enhance the quality of the replacement open space as the landscaping develops.</i></p> <p>10.1.26 <i>The replacement land is therefore land which is not less in area than the open space land to be acquired and is no less advantageous to the persons, if any, entitled to rights of common or other rights, and to the public. It therefore satisfies section 131(4) and the definition in section 131(12) of the 2008 Act.</i></p>		
<b>Mitigation and Compensation</b>					
<b>2.1.4.1</b>	Mitigation for impacts at Gatwick Dairy Farm	SCCaL would like GAL to propose appropriate mitigation against sterilisation of its development land. This could include ensuring the realignment of STR does not prevent access into the retained land and any structures and drainage works do not prohibit development on the adjoining land.	<p>The delivery of the replacement open space is secured in Part 5 of the Draft DCO.</p> <p>The concept designs for the areas of replacement open space will therefore be developed in accordance with the principles</p>	<p><b>Draft DCO</b> (Doc Ref. 2.1)</p> <p><b>ES Appendix 8.8.1 Outline Landscape</b></p>	Under discussion

		<p><b>Updated position (Deadline 1):</b> Discussions ongoing.</p>	<p>provided in the Landscape and Ecological Management Plan and in consultation with Surrey County Council and Reigate and Banstead Borough Council including access arrangements to the replacement open space and the retention of access to the remaining area of Gatwick Dairy Farm.</p>	<p><b>and Ecology Management Plan Parts 1 to 4</b> [APP-113 to APP-116]</p>	
<p><b>Other</b></p>					
<p><i>There are no other issues relevant to this topic in this Statement of Common Ground.</i></p>					

2.2. Air Quality

2.2.1 Table 2.1 sets out the position of both parties in relation to air quality matters.

**Table 2.2 Statement of Common Ground – Air Quality Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>Issues relating to air quality are included within the Health and Wellbeing section of this Statement of Common Ground.</i>					



2.3. Capacity and Operations

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

**Table 2.3 Statement of Common Ground – Capacity and Operations Matters**

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

2.4. Climate Change

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

**Table 2.4 Statement of Common Ground – Climate Change Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
2.4.1.1	ES Chapter 15 Climate Change baseline - Time periods considered for climate change projections are not far enough into the future to represent the worst case scenario.	<p>The most distant time period chosen for assessment was 2040-2069 (2060s) (as detailed in paragraph 15.5.2), however, some asset components are assumed to be operational in perpetuity, and therefore these climate change projections are not adequately far enough into the future to represent the worst case scenario.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant did undertake a thorough climate data gathering exercise sufficient to inform the assessment and meet planning requirements.</p>	The most distant time period chosen for the assessment was 2050-2079 (2060s), not 2040-2069. This time period was selected to represent a reasonable worst-case scenario at the highest resolution that is available. The UKCP18 12km projections used within the assessment do not go beyond 2080. This dataset also include a range of useful variables to support the assessment (e.g. the number of hot days). The probabilistic projections do not contain these variables. In addition to this, it is recommended by the Met Office that consistency is maintained between the time periods used within an assessment. The most pessimistic RCP scenario was also employed to provide an indication of potential worst-case scenario conditions. Climate projections up to 2100 are used in ES Chapter 12: Traffic and Transport and ES Chapter 11: Water Environment in accordance with DMRB guidance.	<p><b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>]</p> <p><b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>]</p>	Agreed
<b>Assessment Methodology</b>					
2.4.2.1	ES appendix 15.8.1 Climate Change Resilience Assessment - Lack of consideration of storm events / wildfire / fog	<p>Storm events are not considered sufficiently in this assessment. Wildfire is not mentioned as a possible climate hazard to impact the airport's operation. However, wildfires in the surrounding area, in particular the smoke they generate can impact airport operations. Risks associated with fog were not included in the risk assessment, however, fog can impact visibility and ability to perform day to day airport operations.</p>	Storm events are considered through the inclusion of extreme rainfall (increased probability of extreme weather events (Risks 2, 13-15 in ES Appendix 15.8.1 Climate Change Resilience Assessment) and high winds (risks 18-21 in ES Appendix 15.8.1 Climate Change Resilience Assessment) within the assessment. The risks associated with these hazards have been assessed as medium. Additional information on changes in wind speeds can be found in Chapter 15 (Paragraph 15.5.28) (APP-040). Reductions in wind speeds are anticipated in winter and summer. Quantitative data on changes in lightning across the UK are not provided by UKCP18 at the 12km scale. A summary of the Met Office findings for changes in lightning flash rate across the UK is provided in Chapter 15 (Paragraph 15.5.27) which suggests that Gatwick can expect lightning frequency to increase during summer and spring and decrease during autumn. Risks 22 and 23 in Appendix 15.8.1 Climate Change Resilience Assessment provide information on the potential impacts, existing mitigation measures and risks associated with increased lightning strikes.	<p><b>ES Appendix 15.8.1 Climate Change Resilience Assessment</b> [<a href="#">APP-187</a>]</p> <p><b>ES Chapter 15 Climate Change</b> [<a href="#">APP-040</a>]</p>	Agreed – although it is insufficient for updated information to just be added to the SoCG

			<p>GAL will put more detail about fog in the Statement of Common Ground (SoCG) of which there will be one combined one for climate change.</p> <p>Additional data is now available for wildfire that was not available at the time of submission of the DCO application, GAL will put more detail about wildfire in the SoCG.</p>		
2.4.2.2	ES appendix 15.8.1 Climate Change Resilience Assessment - Insufficient detail on the climate change impact on critical airport equipment and infrastructure.	<p>Consideration to be given to how climate change could impact critical equipment and infrastructure e.g. power, telecommunications as well as the embedded and additional mitigations to reduce this risk. For example, flooding or storm events impact critical power equipment and causing a power outage.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant has given consideration to the impact climate change could have on 'critical equipment and infrastructure', with subsequent mitigation measures being put in place, as well as consideration being given when new/upgraded products are required.</p> <p>It is acknowledged that the Applicant does not have the exact design of power and telecommunications equipment, but it's assumed that the appropriate mitigation measures identified will be applied to critical equipment.</p>	<p>Electronic equipment is considered within the climate change resilience assessment (ES Appendix 15.8.1 Climate Change Resilience Assessment). Risks 6, 9 and 24 make reference to electronic equipment and the mitigation measures that are in place to ensure it remains operational. This equipment is designed to current temperature ranges based on existing standards and will be updated as part of business as usual operations. New/upgraded products would be sourced based on the latest available design standards.</p> <p>Risk 12 also highlights how HVAC equipment is designed to cope with extreme cold temperatures.</p> <p>Risk 15 highlights risks associated with flooding of electrical equipment and mechanical operating mechanisms. The FRA sets out a Flood Resilience Statement and a Surface Access Drainage Strategy to increase flood storage capacity at site and reduce flood risk for all assets including electrical equipment. Power and telecommunications is incorporated within electronic equipment. At present, the exact design of power and telecommunications equipment is unknown and therefore the equipment was grouped into 'electronic equipment'. It is assumed that the appropriate mitigation measures identified will be applied to critical equipment.</p>	ES Appendix 15.8.1 Climate Change Resilience Assessment <a href="#">[APP-187]</a>	Agreed
<b>Assessment</b>					
2.4.3.1	ES Chapter 15 Climate Change assessment of significant effects - Identification of construction risks is limited	<p>Construction risks identified (refer Table 15.8.5 of ES Chapter 15 Climate Change) are limited and could be addressed in more detail e.g. flooding of site or construction compounds causing health and safety issues, damage to equipment and/or impacts to the construction programme and resulting cost increases.</p> <p><b>Updated position (Deadline 1):</b> Whilst more detail could be added to the construction impacts identified, the Applicant's assessment of construction impacts does constitute a robust assessment that meets the planning requirements and the work undertaken is consistent with the relevant local council's policies regarding climate change</p>	<p>In addition to the information provided in Table 15.8.5 of ES Chapter 15 Climate Change, further information on the identified construction risks is provided in Table 2.1.1 of ES Appendix 15.8.1 Climate Change Resilience Assessment. This risk consider the impact of the increased numbers of extremely hot days and the range of risks covered by the increased probability of extreme weather events including heatwaves and flooding. However, appropriate mitigation measures are in place to mitigate these hazards and risks. These are detailed within the Code of Construction Practice which details the methods in place to ensure construction can be sustained during adverse weather events. Several design measures are included to reduce the risk associated with flooding (e.g. avoiding temporary buildings and operation-critical building systems being in flood risk</p>	<p>ES Chapter 15 Climate Change <a href="#">[APP-040]</a></p> <p>ES Appendix 15.8.1 Climate Change Resilience Assessment <a href="#">[APP-187]</a></p> <p>ES Appendix 5.2.3: Code of Construction Practice (Doc Ref. 5.3)</p>	Agreed

			zones. This is to ensure that the delivery of the project will comply with appropriate environmental and health and safety legislation. The Gatwick Operations Adverse Weather Plan will also support continued construction during adverse weather events.		
2.4.3.2	ES Chapter 15 Climate Change assessment of significant effects - Inconsistency and lack of detail in some climate impact statements	<p>The climate impact statements (Table 15.8.5 and Table 15.8.6 of ES Chapter 15 Climate Change) are lacking in consistency in that some are missing an 'impact'. They have a cause, an 'event' but no end 'impact'. This end result is what should determine the consequence rating and could have led to an underestimation of risk.</p> <p><b>Updated position (Deadline 1):</b> Whilst there are different approaches to undertaking climate change risk assessments, and further detail and clarity around impact statements would be helpful, the Applicant's assessment of operational impacts does however constitute a robust assessment that meets the planning requirements.</p>	The anticipated impacts of climate change are provided for all risks identified within the CCRA. In Chapter 15 of the ES (Climate Change) this is included within Tables 15.8.5 and 15.8.6 within the 'Climate Change Impact' column and in ES Appendix 15.8.1 (Climate Change Resilience Assessment) within Table 2.1.1 in the 'Climate Change Impact' column. Risk ratings would not change following a clarification of specific impacts and therefore no material impact on the assessment will arise.	Tables 15.8.5 and 15.8.6 of <b>ES Chapter 15 Climate Change</b> <a href="#">[APP-040]</a>	Agreed
2.4.3.3	ES appendix 15.8.1 Climate Change Resilience Assessment - Inconsistency and lack of detail in some climate impact statements.	<p>The impact statements are lacking in consistency in that some are missing an 'impact'. They have a cause and an 'event' but no end 'impact'. This end result is what should determine the consequence rating and may be why no risks are rated higher than a medium.</p> <p><b>Updated position (Deadline 1):</b> Whilst there are different approaches to undertaking climate change risk assessments, and further detail and clarity around impact statements would be helpful, the Applicant's assessment of operational impacts does however constitute a robust assessment that meets the planning requirements and the work undertaken is consistent with the relevant local council's policies regarding climate change.</p>	The anticipated impacts of climate change are provided for all risks identified within the CCRA. In Chapter 15 of the ES (Climate Change) this is included within Tables 15.8.5 and 15.8.6 within the 'Climate Change Impact' column and in ES Appendix 15.8.1 (Climate Change Resilience Assessment) within Table 2.1.1 in the 'Climate Change Impact' column. Risk ratings would not change following a clarification of specific impacts and therefore no material impact on the assessment will arise.	Tables 15.8.5 and 15.8.6 of <b>ES Chapter 15 Climate Change</b> <a href="#">[APP-040]</a>	Agreed
2.4.3.4	ES appendix 15.8.1 Climate Change Resilience Assessment - Concerns regarding underestimation of risk	<p>Regarding Risk 7, there is a concern that the impacts could be more severe than just delays in fuelling i.e. reaching flashpoint of aviation fuel on extreme hot days could lead to combustion. Also given it has been suggested that there may be hydrogen usage for low emissions vehicles during construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant has sufficient existing controls in place to combat the risk of fuel combustion.</p>	This risk is aligned with the most recent ARP3 report for Gatwick Airport. The existing procedures that are in place at Gatwick to minimise the risk of fuel combustion during hot weather will also take place during future operation. The airport will continue to adhere to the Airport Fire Service aspects embedded within Gatwick's Heat Plan, as set out in the Airside Operations Adverse Weather Plan (GAL, 2021) as required by the CAA regulations.	n/a	Agreed

**Mitigation and Compensation**

<p>2.4.4.1</p>	<p>ES Chapter 15 Climate Change mitigation, enhancement and monitoring - Lack of identification of additional mitigation / adaptation measures.</p>	<p>Whilst GAL may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures should be noted and communicated with an indication of who is responsible and timing.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant has outlined adequate mitigation and adaptation measures for the project in the report and appendixes, in addition to referencing existing policies and plans in place at GAL.</p>	<p>Further adaptation measures are not formally identified (under the heading of 'further mitigation') as no significant risks were identified within the assessment which would require mitigation that is not already embedded within the Project. However, mitigation measures are included within relevant chapters/documents. The Code of Construction Practice (ES Appendix 5.3.2) includes an overview of relevant mitigation measures. This document is referenced within Chapter 15 of the ES (Climate Change). The Gatwick Airside Operations Adverse Weather Plan (GAL, 2021) sets out additional measures that should be followed during other extreme weather events. The Outline Climate Resilience Design Principles captured within the Design and Access Statement detail how elements of the design have been developed to account for climate change adaptation and would be implemented at the time of construction.</p> <p>An additional summary of mitigation measures/commitments made in relation to mitigation can be found in the Mitigation Route Map.</p> <p>Additionally, several mitigation measures are already embedded within the project. These are detailed within Table 15.8.4 and 15.9.1 in Chapter 15 of the ES (Climate Change).</p>	<p><b>ES Appendix 5.3.2: Code of Construction Practice</b> (Doc Ref. 5.3)</p> <p><b>ES Chapter 15 Climate Change</b> <a href="#">[APP-040]</a></p> <p><b>Design and Access Statement, Volume 5</b> <a href="#">[APP-257]</a></p> <p><b>ES Appendix 5.2.3 Mitigation Route Map</b> <a href="#">[APP-078]</a></p>	<p>Agreed</p>
<p>2.4.4.2</p>	<p>ES appendix 15.5.2 Urban Heat Island Assessment - Mitigation measures should be proposed to reduce the impact of UHI effect.</p>	<p>The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant will monitor UHI. It's also recommended that where feasible and appropriate additional UHI mitigation measures are incorporated.</p>	<p>This statement in Paragraph 3.2.3 of Appendix 15.5.2 Urban Heat Island Assessment is not specific to the project, but refers to the UHI effect in urban centres more generally. The specific evaluation for the project is included in Section 3.3 'Evaluation of the Project'. It is not expected that the Project could create a new UHI effect. However, increased impervious surface cover and buildings alongside projected climate change-induced increases in temperature could exacerbate the increase in the UHI effect.</p> <p>It is noted in Paragraph 3.3.2 of Appendix 15.5.2: Urban Heat Island Assessment that the risks associated with the UHI effect (which were assessed as medium) should be monitored.</p>	<p><b>ES Appendix 15.5.2 Urban Heat Island Assessment</b> <a href="#">[APP-186]</a></p>	<p>Agreed</p>
<p>2.4.4.3</p>	<p>Carbon and Climate Change</p>	<p>The lack of identification of additional mitigation / adaptation measures is a key omission from the Climate Change Resilience Assessment <a href="#">[APP-187]</a> and the Urban Heat Island Assessment <a href="#">[APP-186]</a>. Whilst GAL may not have assessed any of the risks as 'significant', the identification of further adaptation measures that can increase asset resilience should be noted, especially considering the potential underestimation of risk detailed above.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant has outlined mitigation and adaptation measures for the</p>	<p>Further adaptation measures are not formally identified (under the heading of 'further mitigation') as no significant risks were identified within the assessment which would require mitigation that is not already embedded within the Project. However, mitigation measures are included within relevant chapters/documents. The Code of Construction Practice (ES Appendix 5.3.2) includes an overview of relevant mitigation measures. This document is referenced within Chapter 15 of the ES (Climate Change). The Gatwick Airside Operations Adverse Weather Plan (GAL, 2021) sets out additional measures that should be followed during other extreme weather</p>	<p><b>ES Appendix 5.3.2 Code of Construction Practice</b> (Doc Ref. 5.3)</p> <p><b>ES Chapter 15 Climate Change</b> <a href="#">[APP-040]</a></p> <p><b>Design and Access Statement Volume 5</b> <a href="#">[APP-257]</a></p>	<p>Agreed</p>

		<p>project in the report and appendixes, in addition to referencing existing policies and plans in place at GAL.</p>	<p>events. The Outline Climate Resilience Design Principles captured within the Design and Access Statement detail how elements of the design have been developed to account for climate change adaptation and would be implemented at the time of construction.</p> <p>An additional summary of mitigation measures/commitments made in relation to mitigation can be found in the Mitigation Route Map.</p> <p>Additionally, several mitigation measures are already embedded within the project. These are detailed within Table 15.8.4 and 15.9.1 in Chapter 15 of the ES (Climate Change).</p>	<p><b>ES Appendix 5.2.3 Mitigation Route Map</b> <a href="#">[APP-078]</a></p>	
<p><b>Other</b></p>					
<p><i>There are no other matters relevant to this topic in this Statement of Common Ground.</i></p>					

2.5. Construction

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

**Table 2.5 Statement of Common Ground – Construction Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.5.1.1	Securing mitigation	SCC is concerned about the impact of construction of the SAC on its road network.	<p>The indicative construction sequencing and mitigation measures for the Longbridge Roundabout and Balcombe Road Bridge are detailed in the ES Appendix 5.3.1, Buildability Report Part B.</p> <p>The comprehensive construction methodology, programme, and traffic management arrangements will be developed and finalised during the detailed design and pre-construction stages in coordination with Local Highway Authorities and National Highways.</p>	<p><b>ES Appendix 5.3.1 Buildability Report Part B Part 1</b> <a href="#">[APP-080]</a></p> <p><b>ES Appendix 5.3.1 Buildability Report Part B Part 2</b> <a href="#">[APP-081]</a></p>	Under discussion
2.5.1.2	Securing mitigation	<p>Whilst previous information indicated that Longbridge Roundabout would form part of the main construction routing, it now appears that construction routing for the other compounds beyond South Terminal (Airside, MA1, Car Park B, Car Park Y, Car Park Z,) will use the North Terminal Roundabout for access.</p> <p><b>Updated position (Deadline 1):</b> Queries remain. How will GAL use North Terminal Roundabout whilst/ when it is improved?</p> <p>Is this temporary construction compound off the Longbridge Roundabout “just” for the construction of the Longbridge element of the scheme, or is it a construction compound for other elements of the NRP?</p>	<p>The proposed Longbridge roundabout will be slightly larger diameter and extend further west and north to accommodate wider circulating lanes, enhanced active travel infrastructure, and improved capacity on exit and entry lanes, especially for the A23 Brighton Road arm to and from Horley. The existing segregated left turn lane from the A23 Brighton Road southbound into the A23 London Road eastbound will be widened, along with the associated structures supporting this section of the highway and will include a shared use path heading east from the roundabout.</p> <p>Temporary construction compound activities associated with the proposed permanent works will be conducted within Church Meadows, using an access road shared with Dairy Farm as described in the Buildability Report.</p> <p>Construction vehicle access to and from the temporary construction compound at Longbridge Roundabout will be via the existing access track off the eastern side of A217, located approximately 45 metres north of the Longbridge roundabout. The use of Longbridge Roundabout is essential for the A23 Northbound Widening, A23 London Road Bridge Replacement, North Terminal Roundabout Flyover, A23 Brighton Road Bridge Replacement, and Stilt Bridge Widening.</p> <p>The proposed construction methodology and traffic management stages are given in ES Appendix 5.3.1, Buildability Report Part B. The routes for construction vehicles (IHGVs, trucks, and equipment) are outlined in ES Appendix 5.3.3, Outline Construction Traffic Management Plan.</p>	<p><b>ES Appendix 5.3.1 Buildability Report Part B Part 1</b> <a href="#">[APP-080]</a></p> <p><b>ES Appendix 5.3.1 Buildability Report Part B Part 2</b> <a href="#">[APP-081]</a></p> <p><b>ES Appendix 5.3.3 Indicative Construction Sequencing</b> <a href="#">[APP-088]</a></p>	Under discussion

2.5.1.3	Securing mitigation	<p>The entrance to the Longbridge Roundabout compound is not defined.</p> <p><b>Updated position (Deadline 1):</b> The existing access track is inappropriate in terms of width, geometry, its lack of visibility at its crossing of the shared cycle/footway and proximity with the pedestrian signals at the approach to the roundabout. We would expect to see right turns in to the site only allowed via u turns at the Tesco roundabout (ie only left in and left out).</p>	<p>Temporary construction compound activities associated with the proposed permanent works will be conducted within Church Meadows, using an access road shared with Dairy Farm.</p> <p>Construction vehicle access to and from the temporary construction compound at Longbridge Roundabout will be via the existing access track off the eastern side of A217, located approximately 45 metres north of the Longbridge roundabout.</p>		Under discussion
2.5.1.4	Securing mitigation	<p>SCC is concerned that separate entrances to the South Terminal compound are proposed for HGVs (from the roundabout) and private vehicles (from Balcombe Road). This implies that an extended journey on the local road network is required.</p> <p><b>Updated position (Deadline 1):</b> The report states that Balcombe Road will also be used by private vehicles - Buildability Report Part B para 7.4.6 states "Direct access to Balcombe Road for only workforce private cars will be provided. This access will also be used during the replacement of Balcombe Road Bridges that are part of the South Terminal Roundabout works. The access would also allow limited early access to the land to commence construction of the compound prior to access off the South Terminal Roundabout.</p>	<p>The proposed construction methodology and construction vehicle routes is detailed in ES Appendix 5.3.1. Buildability Report Part B, and the Outline Construction Traffic Management Plan.</p> <p>All construction vehicle access will be through the South Terminal Roundabout. Additionally, a separate access route from Balcombe Road is planned specifically for constructing the compound, which includes building the ramps and connections to the South Terminal Roundabout. This access will also facilitate the Balcombe Road Bridge Replacement and the associated embankment widening works.</p>	<p><b>ES Appendix 5.3.1 Buildability Report Part B Part 1</b> <a href="#">[APP-080]</a></p> <p><b>ES Appendix 5.3.1 Buildability Report Part B Part 2</b> <a href="#">[APP-081]</a></p> <p><b>ES Appendix 5.3.2: Annex 3 – Outline Construction Traffic Management Plan</b> <a href="#">[APP-085]</a></p>	Under discussion
2.5.1.5	Construction Impact	<p>For the A23 Longbridge reconstruction, it appears that the south side utility bridge won't be used for pedestrians and the alternative route would be to use the north footway and then go anticlockwise around the whole roundabout. A widened utility bridge for pedestrians etc. would need to be considered in the scheme boundary extent. A controlled pedestrian crossing may need to be considered north/east of the Longbridge Roundabout if users are expected to use the north footway.</p> <p><b>Updated position (Deadline 1):</b> SCC would like consideration of these points in advance to be certain that it does not impact the DCO boundary.</p>	<p>The detailed construction methodology, programme, and traffic management arrangements will be developed and finalised during the detailed design and pre-construction stages in coordination with Local Highway Authorities and National Highways.</p>	n/a	Under discussion
2.5.1.6	Construction Impact	<p>GAL will need to engage with SCC regarding consideration of Lane Rental schemes as well as the Permit scheme within the DCO as Surrey and West Surrey County Councils have commenced operation of Lane Rental Schemes under Section 74a of New Roads and Street Works Act 1991.</p>	<p>GAL will establish a Traffic Management Working Group (TMWG) prior to construction commencing as committed to within the CoCP. The TMWG will be responsible for coordinating and managing material and people movement in accordance with this CoCP (ES Appendix 5.3.1) and other relevant controls including the oCTMP (ES Appendix 5.3.3) and oCWTP (ES Appendix 5.3.2)</p>	<p><b>ES Appendix 5.3.1 Buildability Report Part B Part 1</b> <a href="#">[APP-080]</a></p> <p><b>ES Appendix 5.3.1 Buildability Report Part B Part 2</b> <a href="#">[APP-081]</a></p>	Under discussion



		<p><b>Updated position (Deadline 1):</b> Response provided does not respond to request made. SCC require inclusion within the DCO.</p>	<p>The traffic management plans will be detailed during the detailed design and pre-construction stages in collaboration with National Highways and Local Highway Authorities.</p>	<p><b>ES Appendix 5.3.2 Code of Construction Practice</b> (Doc Ref. 5.3)</p> <p><b>ES Appendix 5.3.2: Annex 3 – Outline Construction Traffic Management Plan</b> <a href="#">[APP-085]</a></p> <p><b>ES Appendix 5.3.2: Annex 2 – Outline Construction Workforce Traffic Plan</b> <a href="#">[APP-084]</a></p>	
2.5.1.7	Construction Impact	<p>SCC requests confirmation that the A23 temporary panel bridge will be suitable for Special Type General Order vehicles as this does serve as a primary route into Horley.</p>	<p>The temporary bridge planned for the A23 will be suitable for Special Type General Order (STGO) vehicles.</p> <p>The detailed design and construction methodology for this A23 temporary bridge will be finalized during the pre-construction stage, in close coordination with Local Highway Authorities and National Highways.</p>	n/a	Agreed
2.5.1.8	Construction Impact	<p>Replacement of the Balcombe Road overbridge will most likely close the road below it to pedestrians for a period with a temporary tunnel underneath to protect pedestrians. Therefore, SCC requests further details regarding reconstruction of the Balcombe Road bridge as this has not been indicated previously.</p> <p><b>Updated position (Deadline 1):</b> SCC would like consideration of these points in advance to be certain that it does not impact the DCO boundary.</p>	<p>The indicative proposed construction methodology for the replacement of the Balcombe Road Bridge is given at ES Appendix 5.3.1 Buildability Report Part B. The detailed construction methodology will be finalised during the detailed design and pre-construction stage.</p> <p>ES Appendix 19.8.1: Public Rights of Way Management Strategy describes the approach to managing impacts on PRoW because of construction and operation of the Project to reduce disruption to users (as far as possible).</p> <p>The detailed PRoW implementation plans for individual PRoW would be developed prior to the commencement of construction.</p> <p>Detailed PRoW implementation plans would be in general alignment with the PRoW Management Strategy for the Project and subject to approval by the relevant Local Planning Authority.</p>	<p><b>ES Appendix 5.3.1 Buildability Report Part B Part 1</b> <a href="#">[APP-080]</a></p> <p><b>ES Appendix 5.3.1 Buildability Report Part B Part 2</b> <a href="#">[APP-081]</a></p> <p><b>ES Appendix 19.8.1 Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a></p>	Under discussion
2.5.1.9	Construction Workforce Travel Plan and Traffic Management Plan	<p>SCC acknowledges the high-level measures, promotion and monitoring proposed in the Outline Construction Workforce Travel Plan but as these are high level with nothing confirmed, a Full</p>	<p>The impact from construction traffic due to movement of construction materials will be managed in accordance with a Construction Traffic Management Plan (CTMP). The impact of construction workforce travelling to and from the Airport will be</p>	<p><b>ES Appendix 5.3.2 Annex 3 Outline Construction Traffic</b></p>	Agreed

		<p>Construction Workforce Travel Plan will be needed for SCC to be able to agree to these.</p> <p><b>Updated position (Deadline 1):</b> SCC recognise that the construction workforce travel plan and construction traffic management plan are both secured through requirements within the DCO and must be approved by the highway authority.</p>	<p>managed in accordance with a Construction Workforce Travel Plan (CWTP), both of which will be developed by GAL and its contractors during detailed design / pre-construction stage in accordance with the Outline Construction Traffic Management Plan.</p> <p>The detailed Construction Traffic Management Plan (CTMP) and Construction Workforce Travel Plan (CWTP) will be developed during detailed design and pre-construction stage in consultation with the relevant highway authority and the National Highways.</p>	<p><b>Management Plan</b> <a href="#">[APP-085]</a></p> <p><b>ES Appendix 5.3.2</b> <b>Annex 2 Outline</b> <b>Construction</b> <b>Workforce Travel Plan</b> <a href="#">[APP-084]</a></p>	
--	--	--	---	---	--

2.6. Cumulative Effects and Interrelationships

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

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

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

2.7. Draft DCO and Explanatory Memorandum

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.7.1.1	Revisions required to Article 22 Discharge of Water	<p>Ordinary watercourses are not adequately addressed.</p> <p><b>Updated position (Deadline 1):</b> Regarding ordinary watercourses, the Council considers the provision of the drainage protective provisions secured on behalf of Surrey County Council in Part 4 of Schedule 9 to the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 (SI 2002/549) would be an appropriate starting point. The Council would welcome the applicant's comments on this suggestion.</p>	<p>The precise nature of the Council's concern with the drafting of article 22 is not clear from this comment – please clarify.</p>	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion
2.7.1.2	Revisions required to the definition of "commencement"	<p>In particular, the implications arising from certain operations which fall outside that definition and which do not appear to be controlled (article 2(1), interpretation);</p> <p><b>Updated position (Deadline 1):</b> All references in this column to the draft Development Consent Order ("dDCO") are to Version 3.0 of the dDO [PDLA-004] dated February 2024. This column provides a summary of the Council's position in respect of the points detailed in Table 2.7. Further detail, particularly in respect of points not addressed in Table 2.7, will be submitted at Deadline 1.</p> <p>It is noted that each of the 15 exceptions to the definition of "commencement" is either included in at least one of the following made DCOs: Sizewell C, Manston Airport, and M25 Junction 28, or "aligns with emerging drafting submitted in the Luton Airport Expansion" dDCO.</p> <p>The SoCG and Explanatory Memorandum ("EM") [AS-006] identify precedents; however, this is not enough. For instance, it does not follow that a provision relevant to the authorisation of a nuclear-powered generating station in Suffolk or the alteration of a motorway junction in Essex is relevant to the instant project. The relevance must be explained and the inclusion of the provision justified. The same point applies to provisions based on those which are included in airport DCOs, made or otherwise.</p>	<p>The drafting of the definition of "commence" has advanced since the version commented upon. There are now 15 exceptions at sub-paragraphs (a) to (o) of article 2(1).</p> <p>These exceptions are all preceded by at least one of the Sizewell C (article 2), Manston Airport (article 2) or M25 J28 (article 2) DCOs or align with emerging drafting submitted in the Luton Airport Expansion application (Schedule 2, Part 1). The only additional provision is sub-paragraph (n) (establishment of temporary haul roads), which has been included as a separate limb for clarity, though the stated activity falls within the scope of other more generally worded exceptions from "commencement" in precedent DCOs (e.g. 'construction of temporary structures').</p> <p>As per paragraph 3.4.1 of the Explanatory Memorandum to the Draft Development Consent Order ("ExM"), it is reasonable and proportionate to include the specified exceptions to enable the efficient use of time in the construction timetable prior to the triggering of "commencement" under the DCO. All pre-commencement activities will be subject to the Code of Construction Practice and its associated management plans (see requirement 7) and must be carried out in accordance with the Carbon Action Plan (see requirement 21).</p> <p>The activities specified in this definition were selected to accord with precedent and as activities which can be (and, in many cases, must be) carried out early in the construction timetable. As per the ExM, the activities do not give rise to materially new or materially different environmental effects to those assessed in the ES.</p>	<p><b>Draft DCO</b> (Doc Ref. 2.1)</p> <p><b>Explanatory Memorandum to the Draft Development Consent Order</b> [AS-006]</p> <p><b>ES Chapter 5 Project Description</b> (Doc Ref. 5.1)</p>	Under discussion

		<p><i>Advice Note Fifteen: Drafting Development Consent Orders</i> (republished July 2018 (version 2)) is clear on this point. It states –</p> <p>“If a draft DCO includes wording derived from other made DCOs, this should be explained in the Explanatory Memorandum. <u>The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO</u>, for example detailing what is factually similar for both the relevant consented NSIP and the Proposed Development. <u>It is not sufficient for an Explanatory Memorandum to simply state that a particular provision has found favour with the Secretary of State previously; the ExA and Secretary of State will need to understand why it is appropriate for the scheme applied for. Any divergence in wording from the consented DCO drafting should also be explained.</u> Note, though, that policy can change and develop”.</p> <p>(Paragraph 1.5, emphasis added).</p> <p>In the light of the above, it is clear the applicant should give reasons specific to each exception being suggested, rather than seeking to rely on the generic reference to precedent made in the EM and SoCG.</p> <p>The Council notes pre-commencement activities are subject to the COCP; however, this is not clear from Requirement 7 (code of construction practice) and it should be made explicit on the face of the dDCO. The limitations of the COCP, and the Council’s concerns about that document, are described elsewhere in this document.</p> <p>Paragraph 3.4.1 of the EM <b>[AS-006]</b> states the excluded operations “do not give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement (Doc Ref. 5.1), being either de minimis or having minimal potential for adverse effects, in line with the Planning Inspectorate’s Advice Note 15”. Paragraph 3.4.1 then goes on to refer to them as “low impact preparatory works”.</p> <p>Certain of the excluded operations would seem capable of giving rise to significant effects and it is not clear how the dDCO restricts these works to “low impact preparatory works”. To give one example, sub-paragraph (k) (“erection of temporary buildings and structures”) does not place any limit on the size of the “buildings</p>	<p>The ES assesses the environmental impacts from preparatory and construction activities for the project, and the activities captured by the exceptions to the definition of "commence" have been assessed as part of this exercise. However, given that the exceptions are categories of activities which form part of the wider preparatory and construction works timetable, there are not specific passages of the ES which can be cited in respect of each individual exception. Certain of the pre-commencement activities which can be identified with particular certainty at this stage are described from Paragraph 5.3.8 of ES Chapter 5: Project Description.</p>		
--	--	---	--	--	--

		<p>and structures” or indicate what “temporary” might mean. An explanation is needed.</p> <p>Regarding temporary exempted works generally (for instance, as well as the temporary buildings and structures already referred to, sub-paragraph (n) provides for the “establishment of temporary haul roads” and sub-paragraph (o) for the “temporary display of site notices, advertisements or information”) it is not clear how these will be dealt with when they are no longer needed. Again, this needs to be made clear on the face of the dDCO.</p> <p>The Council is surprised by the applicant’s conclusion that no passage from the ES can be cited in respect of any exception (noting that, to give one example, the exception could provide for a temporary building of limitless size). The Council considers this approach to pre-commencement activities to be too casual and owing to this, and the lack of certainty as to what the exceptions to “commencement” would entail, considers these works should be subject to the approval of either the local planning authority or local highway authority, depending on the type of works involved.</p>			
2.7.1.3	Article 3 (development consent etc. granted by Order)	<p>Use of the wording “construct, operate and use”</p> <p><b>Updated position (Deadline 1):</b> A drafting point regarding article 3(2): the EM says this paragraph is preceded in art.3(2) of the Manston Airport DCO 2022; however, while Gatwick refers to “Any enactment applying to land <u>within or adjacent</u> to the Order limits ...” Manston refers to “Any enactment applying to land <u>within, adjoining or sharing a common boundary</u> with the Order limits”.</p> <p>The Council would be grateful if the applicant could confirm why it departed from the cited precedent.</p>	<p>Several precedent DCOs contain a separate article authorising the operation and use of the authorised development – see, for example, article 7 of the Sizewell C DCO: “<i>The undertaker is authorised to operate and use the authorised development for which development consent is granted by this Order.</i>”</p> <p>In drafting article 3 of the draft DCO, it was considered that it was clearer and more succinct to subsume the separate authorisation of operation and use into a single provision in article 3.</p>	Draft DCO (Doc Ref. 2.1)	Under discussion
2.7.1.4	Article 9 (planning permission)	<p>Confirmation required around which planning permission and conditions the applicant is concerned about</p> <p><b>Updated position (Deadline 1):</b> To allow the Council to understand the full implications of article 9(3) and (4), the Council requests the applicant provides a full list of the existing planning permissions (including deemed planning permission) which are at issue. Once that information is provided, the Council will be better able to say whether those provisions are acceptable.</p>	<p>Please refer to paragraphs 4.24 – 4.28 of the ExM, which explains the rationale for article 9 in light of the recent Supreme Court decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority</i> [2022] UKSC 30. Other recently submitted DCO applications make similar provision, including the draft Luton Airport Expansion DCO (article 45) and Lower Thames Crossing DCO (article 56).</p> <p>As regards the cited wording which disapplies incompatible conditions of previously granted planning permissions, similar wording features in article 45(2)(c) of the draft Luton Airport Expansion DCO.</p>	Draft DCO (Doc Ref. 2.1)	Under discussion

		<p>Regarding article 9(4), who will decide what “incompatible” means and how that will be conveyed to other parties (e.g. the local planning authority)?</p> <p>Regarding article 9(5), the Council disagrees with the applicant’s analysis that retaining permitted development rights would “allow for <u>minor works</u> to be separately consented without needing to rely on an amendment to the Order, which would be disproportionate and impractical”.</p> <p>First, the Council considers the potential scope of development permitted by the provisions cited in article 9(5) cannot be dismissed as “minor works” and is unconvinced these should be retained. Second, if further development, which is not authorised by the DCO, is to take place at the airport, it should be subject to control by the local planning authority. Third, if the applicant wants the DCO to authorise yet further works, these should be included in Schedule 1 in the usual way (and their effects assessed). This approach is consistent with <i>Advice note thirteen: Preparation of a draft order granting development consent and explanatory memorandum</i> (Republished February 2019 (version 3)) which states (at paragraph 2.9) the dDCO should include the following –</p> <ul style="list-style-type: none"> <li>• “A full, precise and complete description of each element of the NSIP, preferably itemised in a Schedule to the DCO; and</li> <li>• A full, precise and complete description of each element of any necessary “associated development””.</li> </ul> <p>The retention of permitted development rights could, contrary to <i>Advice note thirteen</i>, result in a partial and incomplete description of the proposed development being included in the dDCO.</p>	<p>In response to the further queries:</p> <ol style="list-style-type: none"> <li>1) The drafting at article 9(1) of the draft DCO is a model provision (article 36) which is well-established in numerous precedent DCOs. The drafting is by reference to section 264 of the Town and Country Planning Act 1990 (“TCPA 1990”) and the effect is to ensure that permitted development rights attaching to the undertaker in relation to operational land have effect as they would do if planning permission had been granted for the authorised development. “Operational land” is defined in section 263 TCPA 1990.</li> <li>2) Sub-paragraphs (2) and (3) address legal risk arising from the <i>Hillside</i> decision and ensure that (i) the authorised development can continue to be carried out notwithstanding an incompatible planning permission and (ii) planning permissions granted and initiated prior to commencement of the authorised development under the DCO can continue to be lawfully implemented thereafter. Whether activities authorised by the DCO are taking place pre- or post-commencement do not affect these principles.</li> <li>3) As above.</li> <li>4) ‘Incompatibility’ is as discussed in the <i>Hillside</i> decision. A planning permission would be ‘incompatible’ with the development authorised by the DCO if it were physically impossible to build out both developments (e.g. due to overlapping consented structures).</li> </ol> <p>There is no sub-paragraph (9) in article 9 of the current draft DCO and it is presumed that this point is in reference to sub-paragraphs (5) and (6) of the present drafting. These make clear that the DCO does not restrict the future exercise by the undertaker of permitted development rights. This is necessary to ensure that GAL as airport operator can continue to rely on its extant permitted development rights to facilitate the ongoing operation of the airport and allow for minor works to be separately consented without needing to rely on an amendment to the Order, which would be disproportionate and impractical.</p>		
2.7.1.5	Agreements with highway authorities	<p>The need for highway authorities to agree template agreements before the end of the Examination with the applicant under article 21 (agreements with highway authorities)</p> <p><b>Updated position (Deadline 1):</b> The Council notes paragraph 3 (fees) is to be populated and looks forward to discussing the most</p>	Noted.	n/a	Under discussion

		<p>appropriate way forward regarding fees. On a drafting point, the Council considers the provision should go beyond the payment of a fee in respect of “any for agreement, endorsement or approval in respect of a requirement” and should also apply to the payment of a fee in respect of the granting of any consent in respect of the Order. It will be remembered that several articles require the consent of the street authority (e.g. articles 12(3) and 14(4)), the traffic authority (e.g. article 18(5)(c)) and the highway authority (article 24(4)) and the cost associated with administering this work should also be covered by the applicant.</p>			
2.7.1.6	Consideration of Highway authority Lane Rental and Permit Scheme	<p>The disapplication of several provisions of the New Roads and Street Works Act 1991 without the application of the relevant highway authority’s permit scheme (article 10; application of the 1991 Act).</p> <p><b>Updated position (Deadline 1):</b> The Council maintains its opposition to the disapplication of sections 73B, 73C, 77 and 78A of the 1991 Act. The Council notes the cited precedents. It is now for the applicant to explain why the disapplication of the cited provisions is relevant to this project. That is the approach required by paragraph 1.5 of Advice Note Fifteen (see comments on article 2(1) re “Commencement” above). While the Council has not undertaken an analysis of the cited precedents, the Council assumes the inclusion of these provisions was not controversial in those projects. The position is different here because their inclusion is of concern to the Council. Moreover, it does not follow that what is appropriate for a highways or a nuclear power DCO is relevant to an airport DCO. Similarly, provisions relevant to one airport DCO might not be relevant to another.</p>	<p>The drafting of article 10 has advanced since the version commented on by the Councils and the cross-references are now complete. The latest draft no longer refers to "permit schemes".</p> <p>Section 74A of the 1991 Act is no longer disapplied in the latest draft of the DCO. Sections 73B, 73C and 78A of the 1991 Act are disapplied in several precedent DCOs, including the Sizewell C (article 15), Manston Airport (article 10), A303 (Amesbury to Berwick Down) (article 8) and A417 Missing Link (article 12) DCOs. Section 77 of the 1991 Act is disapplied in the Sizewell C DCO (article 15).</p> <p>GAL invites the Councils to please specify the precise nature of their concern with the disapplication of these provisions and why the approach here should depart from the precedent outlined.</p>	Draft DCO (Doc Ref. 2.1)	Under discussion
2.7.1.7	Street works	<p>The way in which street works are controlled under article 11 (street works).</p> <p><b>Updated position (Deadline 1):</b> Owing to the small number of streets affected within the Order limits, it would seem straightforward to cross-refer in the article to a specified list. The applicant will be aware that such an approach is not unusual. Absent such cross-reference, the Council maintains its position that the power should be subject to street authority control.</p>	<p>The precise nature of the Council's concern with the drafting of article 11 is not clear from this comment – please clarify.</p> <p>Article 11 is by reference to streets "within the Order limits" rather than a specified list of streets because (i) there are only a small number of streets within the Order limits and there is little benefit therefore in listing them in a schedule and (ii) GAL foresees a need for flexibility as regards the streets under which it may need to carry out works, particularly in relation to necessary utility diversions which may become apparent during construction.</p> <p>Further, such an approach is preceded in several DCOs, including the A38 Derby Junctions (article 11), A47 Wansford to</p>	Draft DCO (Doc Ref. 2.1)	Under discussion



			<p>Sutton (article 15), A57 Link Roads (article 10) and Thurrock Flexible Generation Plant (article 11) DCOs.</p> <p>The additional wording proposed in bold is not included in any of these precedent DCOs. Its inclusion would be a departure from well-established precedent and therefore unjustified.</p> <p>The approach in the draft DCO, that article 11 does not require the consent of the street authority while article 12 does, is preceded in the Sizewell C DCO (see articles 13 and 14). The works envisaged by article 12, which extend inter alia to permanently altering the nature and characteristics of streets, are of greater consequence to the ongoing use of the streets in question than the more limited works envisaged by article 11, which are largely in or under the streets. There is therefore good reason why the street authority's consent should be required for works under article 12 and not article 11.</p>		
<b>2.7.1.8</b>	Deeming provisions	The inclusion of deeming provisions in articles 12(4) (power to alter layout, etc. of streets), article 14(8) (temporary closure of streets), 18(10) (traffic regulations), 22(5) (discharge of water), and 24(6) (authority to survey and investigate the land)	<p>The drafting of article 14 has advanced since the version commented on by the Councils.</p> <p><u>New sub-paragraph after sub-paragraph (5)</u></p> <p>The additional wording proposed to be included after existing sub-paragraph (5) is not considered necessary. Sub-paragraph (4) already provides that: "The undertaker must not temporarily alter, divert, prohibit the use of or restrict the use of any street without the consent of the street authority, which may attach reasonable conditions to any consent but such consent must not be unreasonably withheld or delayed". Should the street authority wish to request an alternative route to the temporarily altered/diverted/restricted etc. street be provided, it can do so as a condition to its consent (provided that such a condition is reasonable in the circumstances).</p> <p>Materially similar formulations of article 14 (without the additional proposed wording) were included in precedent DCOs including the M25 Junction 10/A3 Wisley Interchange (article 14) and A38 Derby Junctions (article 15) DCOs. It is also noted that a similar approach has been taken in the emergingdraft Luton Airport Expansion DCO (article 13).</p> <p><u>"Must not be of a lower standard"</u></p>	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

			<p>The further proposed amendment in bold to what is now sub-paragraph (5) ("and must not be of a lower standard") is not justified. Where a street is being temporarily altered, diverted or restricted (etc.), it is not reasonable to require that the temporary diversion be of the same standard as the main permanent route. Indeed, this is unlikely to be the case.</p> <p><u>Deeming provision</u></p> <p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p>		
2.7.1.9	Alternative routes	<p>The standard to which alternative routes must be provided under article 14(5) (temporary closure of streets).</p> <p><b>Updated position (Deadline 1):</b></p> <p><u>New sub-paragraph after sub-paragraph (5)</u></p> <p>The Council cannot envisage a situation when it would not want an alternative temporary route to be provided and considers it would be more straightforward if this was made clear in the DCO.</p> <p><u>"Must not be of a lower standard"</u></p> <p>The Council notes the applicant's response and is considering its position.</p> <p><u>Deeming provision</u></p> <p>The extension of deadline from 28 to 56 days is welcomed; however, the Council maintains its in-principle objection to the deeming provision.</p>	<p>The drafting of article 14 has advanced since the version commented on by the Councils.</p> <p><u>New sub-paragraph after sub-paragraph (5)</u></p> <p>The additional wording proposed to be included after existing sub-paragraph (5) is not considered necessary. Sub-paragraph (4) already provides that: "The undertaker must not temporarily alter, divert, prohibit the use of or restrict the use of any street without the consent of the street authority, which may attach reasonable conditions to any consent but such consent must not be unreasonably withheld or delayed". Should the street authority wish to request an alternative route to the temporarily altered/diverted/restricted etc. street be provided, it can do so as a condition to its consent (provided that such a condition is reasonable in the circumstances).</p> <p>Materially similar formulations of article 14 (without the additional proposed wording) were included in precedent DCOs including the M25 Junction 10/A3 Wisley Interchange (article 14) and A38 Derby Junctions (article 15) DCOs. It is also noted that a similar approach</p>	Draft DCO (Doc Ref. 2.1)	Under discussion

			<p>has been taken in the emerging draft Luton Airport Expansion DCO (article 13).</p> <p><u>"Must not be of a lower standard"</u></p> <p>The further proposed amendment in bold to what is now sub-paragraph (5) ("and must not be of a lower standard") is not justified. Where a street is being temporarily altered, diverted or restricted (etc.), it is not reasonable to require that the temporary diversion be of the same standard as the main permanent route. Indeed, this is unlikely to be the case.</p> <p><u>Deeming provision</u></p> <p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p>		
<b>2.7.1.10</b>	New means of access	<p>The proposal to allow the applicant to create new means of access without the street authority's consent under article 16 (access to works).</p> <p><b>Updated position (Deadline 1):</b> The Council maintains its position that consent is required for the creation of new means of access.</p>	<p>GAL is content to add this wording to article 13.</p>	n/a	Under discussion
<b>2.7.1.11</b>	Traffic regulations	<p>How the "instrument" referred to in article 18(6)(a)(traffic regulations) will be accessed.</p> <p><b>Updated position (Deadline 1):</b> The Council looks forward to hearing from GAL regarding the way in which the "instrument" will be accessed.</p>	<p>The drafting of article 14 has advanced since the version commented on by the Councils.</p> <p><u>New sub-paragraph after sub-paragraph (5)</u></p> <p>The additional wording proposed to be included after existing sub-paragraph (5) is not considered necessary. Sub-paragraph (4) already provides that: "The undertaker must not temporarily alter, divert, prohibit the use of or restrict the use of any street without the consent of the street authority, which may attach reasonable</p>	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

			<p>conditions to any consent but such consent must not be unreasonably withheld or delayed". Should the street authority wish to request an alternative route to the temporarily altered/diverted/restricted etc. street be provided, it can do so as a condition to its consent (provided that such a condition is reasonable in the circumstances).</p> <p>Materially similar formulations of article 14 (without the additional proposed wording) were included in precedent DCOs including the M25 Junction 10/A3 Wisley Interchange (article 14) and A38 Derby Junctions (article 15) DCOs. It is also noted that a similar approach has been taken in the emerging draft Luton Airport Expansion DCO (article 13).</p> <p><u>"Must not be of a lower standard"</u></p> <p>The further proposed amendment in bold to what is now sub-paragraph (5) ("and must not be of a lower standard") is not justified. Where a street is being temporarily altered, diverted or restricted (etc.), it is not reasonable to require that the temporary diversion be of the same standard as the main permanent route. Indeed, this is unlikely to be the case.</p> <p><u>Deeming provision</u></p> <p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p>		
<b>2.7.1.12</b>	Article 25 which relates to trees and hedgerows	<p>Hedgerow works are excluded from the definition of "commencement" (art.2) but this article controls hedgerow works so further explanation is needed as to how they work together.</p> <p><b>Updated position (Deadline 1):</b> If "the removal of hedgerows, trees and shrubs" (i.e one of the exceptions from the definition of</p>	<p>While "removal of hedgerows, trees and shrubs" is excluded from the definition of "commence" in article 2 as noted, the present article (now article 25) will still govern how these activities are carried out, article 25 providing the underlying authority for these activities.</p>	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

		<p>“commence” per article 2(1)(f)) is to be controlled by article 25, the Council considers this should be made explicit in the article itself.</p> <p>The applicant suggests that updated article 25 will refer to tree and hedge works needing to be carried out in accordance with BS 3998:2010 (or more recent industry best practice). However, the most recent dDCO [PDLA-004] does not include this (well-precedented) wording and the Council would be grateful if the applicant could explain its position.</p> <p>Paragraph 22.1 of <i>Advice Note Fifteen: Drafting Development Consent Orders</i> (Republished July 2018 (version 2)) states –</p> <p>“It is recommended that DCO Articles of this kind [i.e. which articles which provide for interference with hedgerows] are made relevant to the specific hedgerows intended for removal. To support the ExA, the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority”.</p> <p>Article 25 is inconsistent with this recommendation: it does not include a schedule or plan, yet it seeks to remove (under article 25(5)) any obligation to secure consent. No reasonable justification is given for this inconsistency. The Council considers the hedgerow-related provisions need to be recast to make them consistent with paragraph 22.1</p>	<p>The wording relating to "important hedgerows" has been removed from the latest draft of article 25, following confirmation that no such hedgerows are anticipated to be affected by the proposed development.</p> <p>Defining "hedgerow" by reference to the Hedgerow Regulations 1997 is well-established in many DCO precedents, including the Sizewell C (article 81), Southampton to London Pipeline (article 42) and Manston Airport (article 34) DCOs. Including a bespoke definition would be a significant departure from precedent and is not considered to be justified.</p> <p>The drafting of article 25 has advanced since the version commented upon by the Councils. For example, article 25(1)(b) now includes "<i>or property within the authorised development</i>". GAL will carefully consider the other proposed additions and will include them in the next draft of the DCO where reasonable and justified. It is not anticipated that there will be any concerns with tree and hedge works needing to be carried out in accordance with BS 3998:2010 (or more recent industry best practice).</p> <p>By way of initial comment on the remaining suggested additions, the new proposed sub-paragraph (3) does not appear necessary because:</p> <ul style="list-style-type: none"> <li>• it is unclear what is meant by "<i>relative bodies</i>";</li> <li>• (3)(a) is not needed because authority is only conferred on the undertaker to fell or lop in the circumstances specified in sub-paragraphs (1)(a) and (b);</li> <li>• (3)(b) is not needed because the DCO will not obviate the need for consents required for protected species or laws related thereto;</li> <li>• (3)(c) is not needed because the draft DCO does not contain drafting obviating the need to obtain a felling licence and such a licence would therefore be required prior to felling; and</li> </ul> <p>(3)(d) is not needed because the existence and protection afforded by tree preservation orders is not disturbed by the DCO (in the absence of express provision).</p>		
2.7.1.13	Article 31 (time limit for exercise of authority to acquire land compulsorily)	The usual period of five years is doubled. Further information about project complexity is required.	The drafting of this article (now article 31) has advanced since the version commented on by the Councils. A time period of ten years has been included, as justified in paragraphs 7.18 – 7.20 of the ExM. This is precedented as described in the ExM and it is further	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

		<p><b>Updated position (Deadline 1):</b> The Council considers the power to acquire land or interests in land should be exercisable for 5, and not 10, years. It should run from the date the order comes into force, rather than the “start date”.</p>	<p>noted that the same approach has been taken in the emerging draft Luton Airport Expansion DCO (article 26).</p>	<p><b>Explanatory Memorandum to the Draft Development Consent Order</b> [<a href="#">AS-006</a>]</p>	
2.7.1.14	Article 40 (special category land)	<p>Timing of vesting of special category land.</p> <p><b>Updated position (Deadline 1):</b> Ordinarily, the Council would expect the order to provide for the acquisition of existing open space land only once a scheme for the provision of the open space land has been implemented to the local planning authority's satisfaction.</p>	<p>The drafting of article 15 has advanced since the version commented on by the Councils and is now complete.</p> <p>The explanation for the single length of footpath proposed to be permanently stopped up for which no substitute is provided is included in ES Chapter 19: Agricultural Land Use and Recreation and ES Appendix 19.8.1: Public Rights of Way Management Strategy. In summary, this portion of footpath would remain as part of the promoted Sussex Border Path but the classification as a 'footpath' would be removed and replaced by the shared use active travel cyclist and pedestrian route along this section of highway.</p>	<p><b>Draft DCO</b> (Doc Ref. 2.1)</p> <p><b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>]</p> <p><b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> [<a href="#">APP-215</a>]</p>	Under discussion
2.7.1.15	Drafting of requirements in Schedule 2	<p>including: the drafting of “start date” (R.3(2) (time limits and notifications); the 14-day notification period in R3(2); why some documents must be produced “in accordance with” the certified documents and others must be produced either “in general accordance” or “in substantial accordance” with them; the drafting of R.14 (archaeological remains); and of those which concern noise (e.g. R.15 (air noise envelope), R.18 (noise insulation scheme)); the ambiguous drafting and omissions in R.19 (airport operations);</p> <p><b>Updated position (Deadline 1):</b></p> <p><u>Requirements: general</u></p> <p>The Council would like to understand why “in general accordance” has been used in Requirements 8(3), 10(2), 11(2), 21 and 22(2); and why “substantially in accordance” has been used in Requirements 7, 8(4), 12(2), 13(2) and 22(3).</p> <p><u>Requirement 3: start date</u> By Requirement 3(1), development must commence within 5 years of the “start date” i.e. the later of the day after (a) the day on which the period for legal challenge of the Order under the 2008 Act has expired; and (b) the final determination of any legal challenge under the 2008 Act. The Council objects to the extended duration of “start date”, which should be when the order comes into force.</p>	<p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p>	<p><b>Draft DCO</b> (Doc Ref. 2.1)</p>	Under discussion

		<p><u>Requirement 3: notice period etc.</u></p> <p>By Requirement 3(2), the relevant planning authority must be given 14 days' notice of commencement of each part of the authorised development. The Council considers a more generous notice period should be included. The Council also considers the local highway authority, which is also a discharging authority for certain requirements, should be notified of commencement.</p> <p>The Council's has several concerns about each of the noise-based requirements. In summary, these include the following points –</p> <p><u>Requirements 15 (air noise envelope)</u></p> <p>There is no role for any local authority control in this Requirement and the Council considers there should be. (The same point applies to R.16 (air noise envelope) and R17 (verification of air noise monitoring equipment)).</p> <p>While the EM summarises the Requirement, it does not provide the necessary justification as required by paragraph 1.5 of Advice Note Fifteen. For instance, it does not provide the source of this provision (if any), the section of the Planning Act 2008 under which it is made, or why it is appropriate for the development of the project. Similarly, It does not explain why the CAA is the appropriate body for discharging Requirements 15 to 17. The Council considers the EM should be amended to reflect these points. The Councils can then better consider their position in respect of them these requirements.</p> <p>The Council notes R.15(4) requires the applicant to publish certain information on a website within 45 days of it being approved by the independent air noise reviewer. The Council seeks confirmation as to why such a long deadline is included. Once approved, a document can be published on a website within seconds. (The same point applies to Rs. 16(6) and 17.</p> <p><u>Requirement 18 (noise insulation scheme)</u></p> <p>Again, little justification is provided for this requirement, which appears to be unprecedented.</p> <p>In the first instance, it would be helpful to know why each of the time limits set out in the requirement has been chosen. For</p>			
--	--	--	--	--	--

		<p>instance, in R.18(1), why does the applicant have up to 3 months from commencement of Work Nos. 1 to 7 to submit noise insulation scheme details to the relevant planning authority? Why can't that be done (say) before commencement? The same point applies to the 6-month limit in R.18(2). The Council would expect these points to be explained or sign-posted in the EM.</p> <p>Again in R.18(2), the Council considers the requirement to use "appropriate steps" to notify residential properties to be imprecise and considers these "steps" should be described in the requirement. As well as being imprecise, absent the explanation, the requirement would be difficult to enforce. In its current form, the requirement does not appear to satisfy at least two of the six tests of conditions (i.e. enforceable and precise) as required by the <i>Circular 11/95: Use of conditions in planning permission</i>.</p> <p><u>Requirements 19 (airport operations)</u></p> <p>R.19(1) requires the applicant to serve notice on the relevant planning authority no later than 7 days after the commencement of dual runway operations informing of the same. The EM explains the timeframe is relevant "to other control mechanisms", though it does not explain what these are and it is not clear from the DCO what these are. The Council would welcome an explanation.</p> <p>R.19(2) would restrict dual runway operations to 386,000 <u>commercial</u> air transport movements per annum. The Council considers a control on <u>total</u> air transport movements per annum would be appropriate and considers a total of no more than 389,000 would be reasonable.</p> <p>R.19(3) allows the use of the northern runway between the hours of 23:00 - 06:00 when the southern runway is not available for use "for any reason". The Council considers "for any reason" to be too broad and considers the use of the northern runway between these times should only be used when the southern runway is not available because of planned maintenance and engineering works.</p>			
2.7.1.16	Schedule 11 (procedure for approvals, consents and appeals)	<p>the 8-week for determining significant applications.</p> <p><b>Updated position (Deadline 1):</b> The Council notes paragraph 3 (fees) is to be populated and looks forward to discussing the most appropriate way forward regarding fees. On a drafting point, the</p>	The drafting of this Part of the DCO has advanced since the version commented on by the Councils. This article is now article 20 and paragraphs 5.56 – 5.58 of the ExM contain an explanation for this article.	<p><b>Draft DCO</b> (Doc Ref. 2.1)</p> <p><b>Explanatory Memorandum to the</b></p>	Under discussion



		<p>Council considers the provision should go beyond the payment of a fee in respect of “any for agreement, endorsement or approval <u>in respect of a requirement</u>” and should also apply to the payment of a fee in respect of the granting of any consent in respect of the Order. It will be remembered that several articles require the consent of the street authority (e.g. articles 12(3) and 14(4)), the traffic authority (e.g. article 18(5)(c)) and the highway authority (article 24(4)) and the cost associated with administering this work should also be covered by the applicant.</p>		<b>Draft Development Consent Order [AS-006]</b>	
<b>2.7.1.17</b>	DCO schedules and plans	<p>Amendments required to address inconsistencies and errors.</p> <p><b>Updated position (Deadline 1):</b> Full detail is provided in the LIR.</p>	The precise nature of the Council's concerns with the schedules and plans is not clear from this comment – please clarify.	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion
<b>2.7.1.18</b>	Protective provisions	<p>The need for Protective Provisions for the Lead Local Flood Authority in respect of Ordinary Watercourses.</p> <p><b>Updated position (Deadline 1):</b> Regarding article 46 (disapplication of legislative provisions), the Council notes the need for any protective provisions will be discussed with the LLFA and updates provided where necessary. The Council considers the drainage protective provisions secured on behalf of Surrey County Council in Part 4 of Schedule 9 to the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 (SI 2002/549) would be an appropriate starting point. The Council would welcome the applicant's comments on this suggestion.</p>	The need for any protective provisions will be discussed with the LLFA and updates provided where necessary.	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion
<b>2.7.1.19</b>	Schedule 1 Authorised Development	<p>The inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development).</p> <p><b>Updated position (Deadline 1):</b> It is not clear to the Council how these hotel-related Works are “associated development”, per section 115 of the Planning Act 2008. There does not appear to be an explanation in the EM. A satisfactory explanation is needed. Moreover, the Council is concerned about the prospect of these works evading proper environmental controls. Owing to these facts, the Council considers these Works should be deleted from the dDCO.</p>	<p>Several provisions of the DCO (including this article 14) contain deeming provisions where the consent of a third-party body is required. A failure to respond to requests for consent in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects. To reflect the Councils' concern regarding deemed approval, the time period after which consent is deemed given has been extended to 56 days rather than the 28 days included in the version of the DCO upon which the Councils have commented.</p> <p>In any event, the drafting of article 16 has advanced since the version commented on by the Councils and no longer contains a deeming provision.</p>	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

2.7.1.20	Section 106	<p>SCC wishes to see issues with the DCO resolved and requires further information as to when the proposed section 106 agreement will come forward and when negotiations will begin in earnest.</p> <p><b>Updated position (Deadline 1):</b> Draft S106 was first received by the local authorities in early February 2024. Currently being reviewed.</p>	<p>GAL is preparing a draft of the section 106 agreement and will circulate this to the relevant local authorities for comment in due course.</p> <p><b>Updated position (Deadline 1):</b> A draft Section 106 Agreement has been shared with the Local Authorities and discussions are ongoing. The draft legal agreement is to be submitted at Deadline 2.</p>	n/a	Under discussion
2.7.1.21	Bayhorne Farm	<p>Prior to the DCO application being submitted Surrey County Council was in the process of bringing forward this site to deliver employment uses which are needed to support the growth of the local economy. The impact of the application is significant and non-reversible if development consent is granted.</p> <p>At page 8 of the Statement of Reasons [AS-008] GAL states in respect of acquisition of land at Bayhorne Farm “The Applicant has issued Heads of terms to Surrey County Council and believes that there is no reason why a voluntary agreement cannot be concluded between the parties.”</p> <p>SCCaL confirms the Heads of Terms have been rejected as they did not address the Council’s concern with respect to sterilisation of development land. The terms offered did not provide a basis for matters to be agreed between the parties by agreement. Therefore, GAL’s statement that a voluntary agreement can be reached based on the Heads of Terms is rejected and is not reflective of the Council’s position.</p> <p><b>Updated position (Deadline 1):</b> Discussion ongoing</p>	<p>GAL is continuing to discuss Heads of Terms with SCC.</p>	n/a	Under discussion
2.7.1.22	Draft Development Consent Order	<ul style="list-style-type: none"> <li>• SCCaL has concerns about the drafting of the dDCO. A summary (which is not exhaustive) is set out below – Article 28 (Compulsory acquisition of rights and imposition of restrictive covenants) – the breadth of powers sought under paragraph (1) and (2);</li> <li>• Article 31 (Time limit for exercise of authority to acquire land compulsorily) – the time limit of 10 years for exercising compulsory purchase powers is excessive, particularly in the context the construction programme provided in the ES Chapter 5: Project Description [APP-030].</li> <li>• Article 35 (Acquisition of subsoil or airspace only) – it is currently unclear how this provision will affect SCCaL’s land.</li> </ul>	<p>GAL is happy to continue its engagement with SCC in relation to how the powers sought in the draft DCO will affect SCC’s land.</p> <p>The compulsory acquisition powers sought are justified as explained in section 7 of the Explanatory Memorandum and section 6 of the Statement of Reasons. GAL is happy to respond to any specific comments from SCC on the wording of the relevant articles.</p> <p>As regards the 10 year time limit in article 31, this time period is justified in paragraphs 7.18 – 7.20 of the ExM. This is predated as described in the ExM and it is further noted that the same approach has been taken in the emerging draft Luton Airport Expansion DCO (article 26).</p>	<p><b>Explanatory Memorandum to the Draft Development Consent Order</b> <a href="#">[AS-006]</a></p> <p><b>Statement of Reasons</b> <a href="#">[AS-008]</a></p>	Under discussion

		<ul style="list-style-type: none"> <li>• Article 37 (Temporary use of land for carrying out the authorised development) – the breadth of powers sought under this article, particularly paragraph (11), and the uncertainty of how it will affect SCCaL’s land.</li> <li>• Article 39 (Temporary use of land for maintaining the authorised development) – the breadth of powers sought under this article, and the uncertainty of how it will affect SCCaL’s land.</li> </ul>			
--	--	--	--	--	--

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
<b>Baseline</b>					
2.8.1.1	Bat roost surveys of trees have not been undertaken	<p>The ecology chapter for the ES states: ‘A total of 43 trees within the surface access improvements boundary were identified as having bat roost potential and of these 36 would be lost. They comprised nine with High roost potential, 28 with Medium roost potential and six with Low roost potential’. No bat roost surveys of ‘high’ or ‘medium’ trees proposed for removal have been carried out to inform the baseline and impact assessment. This contravenes policy in relation to protected species. ODPM circular 06/2005 states:</p> <p>‘The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat..... It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted’.</p> <p><b>Updated position (Deadline 1):</b> As stated, bat roost surveys are required before determination</p>	Bat roost surveys will be completed prior to the commencement of construction to inform the bat licence. These are required to ensure compliance with the relevant legislation protecting bats.	n/a	Not Agreed
<b>Assessment Methodology</b>					
2.8.2.1	Biodiversity Net Gain (BNG) baseline assessment methodology	The BNG baseline has been calculated excluding those areas of the site which will not be impacted by the proposals (i.e airfield grassland). This is a non-standard approach and it is assumed that this approach has been adopted so that net gain can be achieved from a lower baseline value (i.e. net gain is easier to achieve as baseline value is lower).	The approach to the BNG baseline was discussed extensively with both Natural England and the Biodiversity Working Group. There are extensive areas of habitats that are not impacted by the construction of the Project but have been included within the Order Limits to reflect the existing airport boundary and make clear that such land, forming part of the operational airport, remains subject to (as well as benefitting from) the powers and controls secured by the DCO. As set out in Natural England’s RR, the area impacted should be used as the baseline for the BNG assessment. This is in line with other DCO applications such as Luton Airport Expansion.	<b>ES Chapter 9 Ecology and Nature Conservation [APP-034]</b>	Agreed.  However, SCC is of the view that if BNG best practice guidelines are not followed, in

			GAL are committed to delivering biodiversity net gain through the Project and have worked extensively with stakeholders to ensure this is incorporated.		is inappropriate to state the scheme is achieving BNG
<b>2.8.2.2</b>	Need to adopt a landscape scale approach to assessing and addressing ecological impacts	<p>Ecological impacts will extend beyond the project site boundary with potential impacts on bat populations, riparian habitats downstream of the airport and the spread of non-native aquatic species. Disturbance and habitat severance within the airport, including the removal of woodland, trees and scrub along the A23, will impact the functioning of wildlife corridors, notably bat commuting routes both within the site and the wider landscape. Maintenance of habitat connectivity across the airport and wider landscape remains a concern.</p> <p><b>Updated position (Deadline 1):</b> SCC does not agree that this is a landscape approach.</p>	<p>As set out in paragraph 9.4.9 <i>et seq.</i> of Chapter 9 Ecology and Nature Conservation of the ES, the potential for ecological impacts beyond the DCO limits was recognised through the extension of the survey work beyond the limits, where necessary (bats, GCN, riparian mammals etc.).</p> <p>As such, the impact assessment has considered impacts outwith the DCO limits, where there is the potential for such impacts to occur.</p> <p>The impacts of the Project on habitat connectivity have been considered within Section 9 of Chapter 9 Ecology and Nature Conservation of the ES. This concluded that, although there would be nowhere that connectivity would be completely removed, there were areas where it would be reduced due to the loss of woodland. This was assessed as being of moderate adverse significance until the replacement planting matured sufficiently when this was reduced below the threshold of significance.</p> <p>The long-term maintenance of habitat connectivity both across the airport and between the airport and the wider landscape as a result of the Project has been a key driver of the overall Ecology Strategy, as set out in the oLEMP.</p> <p>Opportunities to create enhanced corridors beyond the confines of the existing airport boundary have included those at Brook Farm and Longbridge Roundabout, as set out in the oLEMP (Appendix 8.8.1 of the ES).</p>	<p><b>ES Chapter 9 Ecology and Nature Conservation</b> [APP-034]</p> <p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 to 4</b> [APP-113 to APP-116]</p>	Under discussion
<b>Assessment</b>					
<b>2.8.3.1</b>	The extent of loss of mature broadleaved woodland (and other habitats)	It is not clear from the application document how much woodland is being lost and how much is being enhanced / replanted. The same is true for other habitats. The ecology chapter for the ES does not quantify the amount of loss or compensation. A reference is made to these figures being included in Biodiversity Net Gain (BNG) assessment however this information is not clear within the BNG report (screenshots of the BNG metric have been provided – but this is difficult to navigate and is difficult to review).	The BNG Metric will be supplied via PINS. This provides a breakdown of the loss/gain of the different habitats.	<b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> [APP-136]	Under discussion

		<p>The impact assessment should quantify the loss to accurately describe the impact. In addition, this information would aid with understanding and transparency</p> <p><b>Updated position (Deadline 1):</b> The BNG metric has not been provided by GAL.</p> <p>The Ecology chapter still needs to quantify losses, enhancements and creation in order to assess impacts. This is in line with CIEEM EIA guidelines. BNG does not replace existing legal protections and policy for ecology.</p>			
<b>Mitigation and Compensation</b>					
<b>2.8.4.1</b>	Lack of information on reptile and great crested newt (GCN) mitigation	<p>The ecology chapter for the ES states that reptile and GCN mitigation will involve translocation to receptor sites and where relevant, European Protected Species Licences would be applied for post DCO consent. However, no detailed information is provided for the reptile and GCN mitigation strategy, for example:</p> <ul style="list-style-type: none"> <li>• Where are the receptor sites? Reference is made to Longbridge Roundabout, Museum fields and other mitigation areas but there is no detail as to which one of these has been chosen to be the receptor locations for reptiles and GCN.</li> <li>• No methodology or timings information for the mitigation strategies.</li> </ul> <p><b>Updated position (Deadline 1):</b> The information provided in response should be included within the submission documentation. It is unclear whether residual impacts have been assessed appropriately without having an outline mitigation strategy in place.</p>	<p>A Ghost GCN licence is being produced and will be agreed with Natural England as part of the SoCG process. This will include details of mitigation, as necessary, designed according to the Great Crested Newt Mitigation Guidelines (English Nature 2001). The mitigation principals for GCN would include fencing and pitfall trapping, if necessary, or habitat manipulation and clearance under Ecology Clerk of Works (ECoW). Receptor sites will be chosen as appropriate for the population being translocated. Options could include within Brook Farm or the existing biodiversity areas within the Gatwick Estate.</p> <p>Mitigation strategy for reptiles will be defined following pre-commencement surveys. As per Table 9.8.1 of Chapter 9 Ecology and Nature Conservation, in areas where small populations are identified, if appropriate, habitat manipulation will be used to encourage animals to move out of the construction zone. If larger populations found, or if habitat manipulation is not considered appropriate due to the isolation of the habitat to be cleared, areas will be fenced with reptile-proof fencing and subject to an appropriate period of trapping with animals moved to a receptor site suitable for the location animals are being moved from. The location of the receptor site will depend on where the population is located and will be determined during detailed design. Examples of options for receptor sites could include grassland along the River Mole and Gatwick Stream corridors or within Brook Farm.</p> <p>Timings of mitigation with respect to both GCN and reptiles would be in accordance with best practice (i.e. when animals are active between March and October), in appropriate weather conditions.</p>	<b>ES Chapter 9 Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>	Not Agreed

2.8.4.2	No compensation provided for loss of ponds	<p>The ecology chapter states that no replacement ponds will be provided within the application site due to airport airstrike safety. This is fully justified however, it is not understood why off-site provision of new ponds has not been considered.</p> <p><b>Updated position (Deadline 1):</b> The response does not clarify why pond provision could not be considered offsite and also whether small wildlife ponds would increase risk of bird strike?</p>	<p>The issue of the provision of ponds in relation to airport safeguarding is described in Section 9 of Chapter 9 Ecology and Nature Conservation in the ES.</p>	<p><b>ES Chapter 9 Ecology and Nature Conservation [APP-034]</b></p>	Under discussion
2.8.4.3	Longbridge Roundabout Mitigation area (Gatwick Dairy Farm)	<p>Clarification is required as to what the legal mechanism will be adopted for the management and maintenance of Longbridge Roundabout Mitigation area (Gatwick Dairy Farm). It is assumed that land will be compulsory purchased and all future management and maintenance of the land would be the responsibility of GAL.</p> <p><b>Updated position (Deadline 1):</b> No further information has been made available</p>	<p>GAL is preparing further information on this matter and will provide to the LPAs once available.</p>	n/a	Under discussion
2.8.4.4	Additional opportunities for biodiversity enhancement	<p>Many potential opportunities for biodiversity enhancement, both within and outside the Site, were never explored. For example, conversion of 'amenity grassland' currently present on road verges and roundabouts within the Site to wildflower grassland through reduced mowing and/or re-seeding with wildflowers, and the improved management of Gatwick Stream and Crawler's Brook</p>	<p>Opportunities for biodiversity enhancement as part of the Project have been explored for the road network being modified along the A23, where practicable. The landscape design for the internal road network has not yet been completed. The option for the inclusion of reduced mowing management methods will be considered as part of that process.</p> <p>Opportunities to create enhanced corridors beyond the confines of the existing airport boundary have included those at Brook Farm and Longbridge Roundabout, as set out in the oLEMP.</p>	<p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 to 4 [APP-113 to APP-116]</b></p>	Under discussion
2.8.4.5	Security of long term positive management of the two existing biodiversity areas managed by GAL, the North West Zone (NWZ) and Land East of the Railway Line (LERL)	<p>The North West Zone (NWZ) and Land East of the Railway Line (LERL) are of considerable biodiversity value and key components of the ecological network. Any loss or degradation could have significant impacts on the effectiveness and viability of the proposed mitigation areas. ES Ch. 9 Section 9.6.172 states that 'Positive work through the GAL Biodiversity Action Plan (BAP) is likely to continue ...'.</p>	<p>The NWZ will be included within the LEMP for the River Mole works and the LERL within the LEMP for the works in that area.</p> <p>Requirement 8 of the dDCO sets out that appropriate LEMPs for these areas are to be produced, based on the oLEMP. This places a legal obligation on GAL to undertake the management proposed which will, in turn, protect these areas.</p>	<p>Requirement 8 of the <b>Draft DCO</b> (Doc Ref. 2.1)</p> <p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 to 4 [APP-113 to APP-116]</b></p>	Agreed subject to revision of the oLEMP to clarify this point
<b>Other</b>					
2.8.5.1	Gatwick Greenspace partnership	<p>Continued support for the Gatwick Greenspace Partnership is proposed to be included within the new NRP Section 106 Agreement. Engagement is required with partners on proposals.</p>	<p>SCC's request is noted. Details of the S106 will be circulated as they evolve.</p> <p><b>Updated position (Deadline 1):</b> A draft Section 106 Agreement has been shared with the Local Authorities and discussions are</p>	n/a	Under discussion

		<b>Updated position (Deadline 1):</b> The draft S106 provided does not include any provision for the Gatwick Greenspace Partnership	ongoing. The draft legal agreement is to be submitted at Deadline 2.		
--	--	---	--	--	--

2.9. Forecasting and Need

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

**Table 2.9 Statement of Common Ground – Forecasting and Need Matters**

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



2.10. Geology and Ground Conditions

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

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

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

2.11. Greenhouse Gases

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

**Table 2.11 Statement of Common Ground – Greenhouse Gases Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
2.11.1.1	Baseline information review - GHG emissions from airport buildings and ground operations does not appear to include maintenance, repair, replacement or refurbishment emissions.	<p>The scope of the GHG emissions arising from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment emissions. Therefore, this would under account the operational GHG emissions. It is not clear what is captured under “other associated businesses”.</p> <p><b>Updated position (Deadline 1):</b> Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions and where all such exclusions total a maximum of 5%.</p> <p>Additionally, GAL should recognise the potential impact of emissions stemming from airport operations at least qualitatively for the sake of transparency. This acknowledgment aligns with one of the key principles of GHG accounting.</p>	<p>The methodology for the assessment was structured to follow the ANPS classification of emissions into four categories, and the assessment of Construction impacts was limited within the ES to those impacts prior to opening. The assessment was not seeking to provide a Whole Life Carbon assessment of the Project - a point explicitly noted within the ES.</p> <p>Maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the ES Appendix 5.4.2 Carbon Action Plan, specifically regarding to employing PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>Regarding terminology of “associated businesses” in Table 16.4.1 of ES Chapter 16 Greenhouse Gases seeks to include other operations within the boundary of the Application that generate waste during typical operations of the airport.</p>	<p><b>ES Appendix 5.4.2 Carbon Action Plan</b> [APP-091]</p> <p><b>ES Chapter 16 Greenhouse Gases</b> [APP-041]</p>	Under discussion
<b>Assessment Methodology</b>					
2.11.2.1	Assessment of aviation GHG emissions - It is not clear how or if GAL converted CO2 emissions from aircraft to CO2e.	It is not clear if GAL undertook a conversion from CO2 to CO2e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) <sup>3</sup> . If not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO2e in 2028 in the most carbon-intensive year where 5.327 MtCO2e was estimated to be released (Table 5.2.1).	The modelling process estimated fuel consumption from aviation, and that this was then converted to estimated tCO2e using the appropriate conversion factor. All aviation emissions within the ES are reported to reflect tonnes of carbon dioxide equivalent (tCO2e).	n/a	Agreed

2.11.2.2	Carbon and Climate Change	<p>The GHG Assessment is non-compliant with the GHG Protocol Corporate Accounting Standard and GHG accounting best practice, with potentially not all emission sources included.</p> <p><b>Updated position (Deadline 1):</b> Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions and where all such exclusions total a maximum of 5%.</p> <p>Additionally, GAL should recognise the potential impact of emissions stemming from airport operations at least qualitatively for the sake of transparency. This acknowledgment aligns with one of the key principles of GHG accounting.</p>	The comment is noted but the suggested omissions are not detailed in the comment.	n/a	Under discussion
<b>Assessment</b>					
2.11.3.1	Assessment of significant effects - The ES fails to consider the risks raised by the CCC's expert advisory panel, which warns that the UK jet zero policy is non-compliant with the UK's net zero trajectory. Therefore, it is considered that the conclusion of ES is not in alignment with the IEMA (2022) GHG Assessment Guidance.	<p>The CCC, in their latest progress in reducing emissions publication (June 2023) and previous publications, raised serious concerns over the UK Jet Zero policy as summarised in Page 267, 'Airport expansion' bullet point of the latest report<sup>1</sup></p> <p>The GHG aviation methodology has resulted in a lack of transparency with regard to the emissions relative to the without Project Scenario since by 2047, there will be an increase of around 60,922 Annual Aircraft Movements as presented in Table 3.7.1 of the ES [TR020005]. The GHG Assessment conceals the emissions by applying emissions reductions from the Jet Zero High Ambition scenario.</p> <p>Therefore, based on the 'high risk' of the Jet Zero High Ambition Scenario not being achieved, emissions from the Project will be significantly higher than the baseline scenario. Hence, based on the advice from the CCC, it would suggest that the expansion of the GAL airport and increase in demand is not in line with the UK's net zero trajectory. .</p>	<p>It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following:</p> <p><i>"We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022.</i></p> <p><i>The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</i></p> <p><i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."</i></p> <p>The NRP application accords with government policy. As set out in the Government's Response, aviation expansion (explicitly including the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.</p>	n/a	Agreed
2.11.3.2	Assessment of significant effects - no assessment of cumulative UK airport expansion emissions has been considered on how this will impact the UK's net zero trajectory	The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels <sup>2</sup> . This Figure is not up to date as Gatwick is proposing to increase its operating capacity to 80.2 million passengers per annum, which would make the total Figure >150 million more passengers a year by 2050 relative to 2019 levels. As discussed	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	<b>ES Chapter 16 Greenhouse Gases</b> <a href="#">[APP-041]</a>	Agreed

		<p>above, airport expansion, demand management, and reliance on nascent technology are three key areas raised by the CCC that could jeopardise the UK's net zero trajectory. A significant increase of &gt;150 million passengers will greatly increase the UK's cumulative aviation emissions, which may have significant consequences on the UK's net zero trajectory.</p> <p><b>Updated position (Deadline 1):</b> We acknowledge the Applicant's assessment has been undertaken with consideration to the Jet Zero high ambition trajectory and that this trajectory is representative of government's current 'budget' for aviation to contribute to net zero. On this basis it could be considered to align with the approach set out by IEMA.</p>	<p>(other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that <i>'effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other.'</i></p>		
<b>Mitigation and Compensation</b>					
There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.					
<b>Other</b>					
2.11.5.1	Legislation policy and guidance - Consideration of UK Climate Change Committee (CCC) Progress in reducing emissions report	The latest Climate Change Committee Progress Report to Parliament published in June 2023 has identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero.	<p>It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following:</p> <p><i>"We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022.</i></p> <p><i>The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</i></p> <p><i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."</i></p> <p>The NRP application accords with government policy. As set out in the Government's Response, aviation expansion (explicitly including the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.</p>	n/a	Agreed
2.11.5.2	Carbon and Climate Change	The Greenhouse Gas (GHG) Assessment fails to consider the risks of the Jet Zero Aviation Policy and how this could compromise the UK's net zero trajectory in alignment with the	It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.	n/a	Agreed

		concerns raised to the UK Government by the Climate Change Committee.			
--	--	---	--	--	--

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
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
<b>Assessment Methodology</b>					
2.12.2.1	Assessment of true pollutant concentrations in the period 2029 - 2032	Separation of construction and operational assessments over the period 2029 to 2032 is likely to result in an underestimation of the 'true' pollutant concentrations experienced by residents during this period.	Project Lifetime Effects are set out in ES Chapter 20: Cumulative Effects and Inter-Relationships, Table 20.8.3. This specifically considers the combined effects of different assessment years. ES Chapter 20 also reports on receptor-led Inter-related effects. i.e. the potential for multiple effects to interact, spatially and temporally, to create inter-related effects on a receptor or receptor group.	<b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> [APP-045]	Under discussion
<b>Assessment</b>					
2.12.3.1	Consideration of cumulative impact on key neighbourhoods	Parts of Horley and Charlwood will be affected by both construction and operation of the project. Horley Central and South is one of the most deprived LSOAs in Surrey and the full cumulative impact of construction and operation phases of the project must be considered, including the short and long term effects on physical and mental well being and health.	<p>ES Chapter 18: Health and Wellbeing defines the site-specific study areas in Section 18.4, paragraph 18.4.13. Paragraph 18.4.10 explains that the 'site-specific' population relates to the most localised effects close to sources. Horley Central &amp; South (E05012876) is one of the 9 wards. ES Chapter 18: Health and Wellbeing sets out the assessment of interactions and combined effects in Section 18.11, paragraph 18.11.1 to 18.11.22. That section considers how each of the potential health effects that are assessed in isolation within Section 8.8 may interact or result in greater effects in combination. The assessment follows guidance (IEMA 2022) and presents the analysis both by geographic population and by vulnerable group sub-population. ES Chapter 18 paragraphs 18.11.3 to 18.11.8 explains the combined site-specific effects. Consideration is given to short and long term effects and to effects on physical and mental wellbeing outcomes. The assessment concludes that there would not be no new or materially different significant population health effects due to inter-related effects. Notwithstanding this conclusion, paragraph 18.11.22 sets out further mitigation to ensure there is a process to mitigate against exceptional circumstances relating to vulnerable individuals and combined effects. This is a best practice assessment and approach to combined effect mitigation.</p> <p>Cumulative effects between different projects are set out in Chapter 18 Section 18.10, paragraph 18.10.1-32 to 18.11.22. Additional information is set out in ES Chapter 20: Cumulative Effects and Inter-Relationships.</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043]</p> <p><b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> [APP-045]</p>	Under discussion

2.12.3.2	Health impact of ultrafine particles	<p>That the health impact of ultrafine particles appears to be understated and that there is a lack of any plans to undertake long term residential real time monitoring of ultrafine particles, both number and size distribution, using equipment used on the UK national network.</p> <p><b>Updated position (Deadline 1):</b> Assumption around proportional changes in modelled PM2.5 acting as a potential indicator of the proportional change in aviation related ultrafines is considered flawed, and likely to significantly underestimate aviation UFP impact, and thus potential health impact.</p>	<p>ES Chapter 18: Health and Wellbeing sets out the assessment of population health effects associated with ultra fine particulates in Section 18.8, paragraph 18.8.67 to 18.8.85. The assessment explains the state of epidemiological understanding on the extent to which UFPs are likely to affect health outcomes for populations near airports. The current evidence is that there is not a large effect. The health assessment is conservative, the likely population health effects reflect current scientific understanding and are therefore not understated. Monitoring is supported by the health assessment.</p> <p>ES Chapter 13: Air Quality sets out proposed monitoring for the Project, see paragraphs 13.9.7-19. 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. This reflects that one of the current weaknesses of the epidemiological literature is inconsistent study designs. The appropriate commitment is therefore for participation in a coordinated national study of UFPs across airports.</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043]</p> <p><b>ES Chapter 13: Air Quality</b> [APP-038]</p>	Under discussion
2.12.3.3	Ultrafine particles	<p>Residents' exposure to ultrafine particles (UFP) and the fact that the health impact assessment of UFP appears to understate the potential impact.</p> <p><b>Updated position (Deadline 1):</b> Assumption around proportional changes in modelled PM2.5 acting as a potential indicator of the proportional change in aviation related ultrafines is considered flawed, and likely to significantly underestimate aviation UFP impact, and thus potential health impact.</p>	<p>ES Chapter 18: Health and Wellbeing sets out the assessment of population health effects associated with ultra fine particulates in Section 18.8, paragraph 18.8.67 to 18.8.85. The assessment explains the state of epidemiological understanding on the extent to which UFPs are likely to affect health outcomes for populations near airports. The current evidence is that there is not a large effect size and that the most appropriately public health response is monitoring. The health assessment is conservative, the likely population health effects reflect current scientific understanding and are therefore not understated. Monitoring is supported by the health assessment (see paragraph 18.8.85).</p> <p>ES Chapter 13: Air Quality sets out proposed monitoring for the Project, see paragraphs 13.9.7-19. Paragraph 13.9.19 confirms that GAL commits to participating in national aviation industry body studies of UFP emissions at airports including those reviewing how monitoring could be undertaken. This reflects that one of the current weaknesses of the epidemiological literature is inconsistent study designs. The appropriate commitment is therefore for participation in a coordinated national Government run study of UFPs across airports.</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043]</p> <p><b>ES Chapter 13: Air Quality</b> [APP-038]</p>	Under discussion
<b>Mitigation and Compensation</b>					
2.12.4.1	Exploration of cumulative health impacts	SCC wishes to see further exploration of cumulative health impacts and identification of any resulting need for further	Cumulative effects between different projects are set out in Chapter 18 Section 18.10, paragraph 18.10.1-32 to 18.11.22. Additional	<b>ES Chapter 18: Health and</b>	Under discussion

		<p>mitigation and to reiterate district and borough requests for the local authority real time (NOx, PM, ozone) and diffusion tube monitoring to be funded (revenue and capital replacement costs) to 2047 or 389,000 movements.</p> <p><b>Updated position (Deadline 1):</b> Further discussions on operational monitoring and the S106 are proposed to resolve this matter as current (Feb 2024) do not address funding to full capacity i.e. 2047 and appear to have omitted ozone</p>	<p>information is set out in ES Chapter 20: Cumulative Effects and Inter-Relationships. The health assessment conclusions on cumulative air quality effects are informed by ES Chapter 13: Air Quality. Cumulative air quality effects are discussed in Chapter 13 section 13.11. The Air Quality assessment is cumulative, particularly with respect to traffic emissions, including all planned growth in the with and without Project scenarios. As no new or materially different significant effects in relation to air quality and population health effects are expected due to cumulative projects, including taking into account non-thresholds effects, no further mitigation and monitoring is proposed beyond that already set out in ES Chapter 13 for the main assessment.</p> <p>The assessment in Section 13.9 of ES Chapter 13 Air Quality summarises the proposed operational phase air quality monitoring.</p> <p>Monitoring commitments will be secured under the draft Section 106 agreement to be entered in relation to the Project.</p> <p>The Section 106 agreement commits to funding of monitoring at three existing local authority stations and the continuation of monitoring at Gatwick airport monitoring site. In addition, Gatwick will add an additional Defra reference equivalent monitor and additional indicative MCERT continuous monitors. This approach is considered proportionate given the cost of monitoring equipment and the results of the ES which show there are no significant effects being predicted.</p> <p><b>Updated position (Deadline 1):</b> A draft Section 106 Agreement has been shared with the Local Authorities and discussions are ongoing. The draft legal agreement is to be submitted at Deadline 2.</p>	<p><b>Wellbeing</b> <a href="#">[APP-043]</a></p> <p><b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> <a href="#">[APP-045]</a></p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a></p>	
<p><b>Other</b></p>					
<p><i>There are no other issues relating to this topic within this Statement of Common Ground.</i></p>					



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
<b>Baseline</b>					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
<b>Assessment Methodology</b>					
2.13.2.1	Written Scheme of Investigation for Post-Consent Archaeological Investigations – Surrey	The sampling strategies set out in paragraphs 6.2.17 and 6.2.18 are not wholly acceptable as they do not conform to the minimum standards adopted by the council for the examination of archaeological features.	This sampling strategies set out in the WSI for Surrey can be revised in the next version of the document.	<b>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations - Surrey [APP-105]</b>	Agreed subject to updated WSI for Surrey
<b>Assessment</b>					
<i>There are no issues relating to the assessment for this topic within this Statement of Common Ground.</i>					
<b>Mitigation and Compensation</b>					
<i>There are no issues relating to the mitigation and compensation for this topic within this Statement of Common Ground.</i>					
<b>Other</b>					
<i>There are no other issues related to this topic within this Statement of Common Ground.</i>					

2.14. Landscape, Townscape and Visual

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
<i>There are no other issues relating to the baseline in this Statement of Common Ground.</i>					
<b>Assessment Methodology</b>					
2.14.2.1	The approach to and judgements within the Landscape and Visual Impact Assessment	Range of concerns, including quality of visualisations, approach to tranquillity assessment, treatment of undesignated landscapes and assessment of effect	<p>Visualisations included in the ES as photomontage/photo wirelines (ES Chapter 8 Figures 8.9.1 to 8.9.128) are to Type 3 of the Landscape Institute, Visual Representation of Development Proposals: Technical Guidance Note 06/19. The methodology for the preparation of visualisations is in Appendix 8.4.1. Maximum parameters are modelled accurately. The visualisations show maximum parameters of the proposed development as simple wireline boxes, which is appropriate for the inclusion within a DCO. A Design and Access Statement has been prepared to provide design quality control without being too restrictive for future design stages.</p> <p>The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in ES Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The increase in overflying aircraft at less than 7000 ft above local ground level as a result of the project, compared to the future baseline scenario in 2032, has informed the assessment of perception of tranquillity with nationally designated landscapes.</p> <p>No reference is provided as to what ‘treatment of undesignated landscapes and assessment of effect’ are. This needs to be clarified by SCC. The Applicant is happy to discuss these issues further during the TWG’s and provide any further information required as part of the SoCG process.</p>	<p><b>ES Chapter 8 Landscape, Townscape and Visual Figures - Part 3</b> <a href="#">[APP-062]</a></p> <p><b>ES Chapter 8 Landscape, Townscape and Visual Figures Parts 1</b> <a href="#">[APP-060]</a></p> <p><b>ES Chapter 8 Landscape, Townscape and Visual Figures Parts 2</b> <a href="#">[APP-061]</a></p> <p><b>ES Appendix 8.4.1 Landscape Townscape and Visual Impact Assessment Methodology</b> <a href="#">[APP-109]</a></p> <p><b>Design and Access Statement Volumes 1 to 5</b> <a href="#">[APP-253 to APP-257]</a></p>	Under discussion
2.14.2.2	<b>LVIA</b>	<p>The approach to and judgements within the Landscape and Visual Impact Assessment especially in relation to:</p> <ul style="list-style-type: none"> <li>the tranquillity assessment including its extent.</li> <li>assessment of landscape value and sensitivity in relation to undesignated landscapes such as those not in close proximity to the airport; the judgement around significance</li> </ul>	The extent of the tranquillity study area considered within the LTVIA at Chapter 8 of the ES has been determined through an appropriate methodology which applies the criteria in CAP1616 Appendix B to consider overflights from aircraft at up to 7,000 ft above local ground level. See also ES Appendix 14.9.2: Air Noise Modelling. The increase in overflying aircraft as a result	<b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a>	Under discussion

		<p>of effects on landscape character and features including in relation to those judged to have 'moderate' levels.</p> <ul style="list-style-type: none"> <li>• The number of viewpoints, especially in relation to mid and far distant views, or changes to layouts; the approach to the visual baseline assessment, and the approach to sensitivity, magnitude and significance.</li> <li>• The quality of visual assessment presentation in relation to the wire-frame images, the issue of accuracy and completeness.</li> </ul>	<p>of the Project, compared to the future baseline scenario in 2032, has informed the assessment of perception of tranquillity with nationally designated landscapes.</p> <p>Existing and proposed ZTVs have been undertaken for a 15 km radius to inform the extent of the study area. The ZTV indicates that the vast majority of land that may be potentially intervisible with development at Gatwick Airport lies within a 5 km radius. This has defined an appropriate study area to capture the relevant landscape and townscape receptors (including undesignated landscapes) that are likely to be affected by the Project and to ensure that all likely significant effects have been identified. ES chapter 8 includes a thorough assessment of landscape value, sensitivity, magnitude of impact and significance of effect based on a methodology within Appendix 8.4.1.</p> <p>32 representative viewpoint locations have been identified to inform the assessment of effects on visual amenity. 10 further candidate viewpoint locations requested by consultees were analysed and not taken for assessment within the ES due to lack of visibility (See ES Appendix 8.6.2).</p> <p>The visual baseline situation is described in ES Chapter 8 section 8.6. This includes a description of the view from 32 representative viewpoints. An assessment of effects on receptors in these public locations and also in private locations in key residential and commercial properties is included in the ES Chapter 8 at Sections 8.9. and 8.11. A definition of visual receptor sensitivity criteria is included at Table 2.2.4 of ES Appendix 8.4.1 LTVIA Methodology. The assessment of effect is described in Section 8.9. and 8.11 of ES Chapter 8 and includes sensitivity, magnitude of impact and level of effects for each visual receptor during day and night and summer and winter.</p> <p>Photomontage/photo wirelines based on maximum parameter models defined within the DCO (ES Chapter 8 Figures 8.9.1 to 8.9.128) are to Type 3 of the Landscape Institute, Visual Representation of Development Proposals: Technical Guidance Note 06/19. The methodology for the preparation of visualisations is in ES Appendix 8.4.1.</p>	<p>Figures 8.9.1 to 8.9.128 of <b>ES Chapter 8 Landscape, Townscape and Visual Figures - Part 3</b> <a href="#">[APP-062]</a></p> <p><b>ES Appendix 8.4.1 Landscape Townscape and Visual Impact Assessment Methodology</b> <a href="#">[APP-109]</a></p> <p><b>ES Appendix 8.6.2 Additional Viewpoints</b> <a href="#">[APP-111]</a></p> <p><b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a></p>	
<b>Assessment</b>					

2.14.3.1	Consideration of the potential changes to the Surrey Hills AONB boundary	It does not appear that this has been considered.	<p>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.</p> <p>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.</p>	n/a	Under discussion
2.14.3.2	The loss of or change in existing green infrastructure, including potential loss of important or historic hedgerows and existing greenspace.	Information on general rather than detailed loss is provided in the documentation.	<p>The majority of the vegetation that would be removed as part of the surface access improvements of the A23 would be scrub and small to medium sized trees. Reinstatement of scrub and tree planting (illustrative designs for landscape mitigation are shown in the Outline LEMP). Annex 4 of the oLEMP includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences.</p> <p>Effects on landscape character and visual amenity as a result of vegetation loss generally and within existing green space (Riverside Garden Park) are assessed during construction and when operational within the LTVIA at Chapter 8 of the ES, sections 8.9. and 8.11.</p> <p>Landscape proposals are illustrated in the Outline LEMP including provision of replacement green space.</p> <p>Further work is currently being undertaken to identify all important trees and hedgerows that are likely to be impacted by the development. Additional tree surveys have been undertaken. Work is ongoing to complete Arboricultural Impact Assessments to include landscape protection measures. The Applicant is happy to discuss these issues further during the TWG's and provide any further information required as part of the SoCG process.</p>	<p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 to 4</b> [APP-113 to APP-116]</p> <p><b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [APP-033]</p>	Under discussion – see points made in ecology section
<b>Mitigation and Compensation</b>					
2.14.4.1	Approach to mitigation and compensation	Approach to mitigation and compensation for all adverse landscape and visual effects including consideration of strategic green infrastructure in and around the airport.	Maximum parameter models have been assessed for elements within the Project (where necessary) and form an appropriate level of detail required for the application (see ES Chapter 8, Table 8.7.1). A greater level of detail for landscape mitigation proposals is provided for the surface access improvements, in accordance with DMRB in ES Appendix 8.8.1, Outline LEMP. A	<b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [APP-033]	Under discussion

			<p>Design and Access Statement has been prepared to provide design quality control without being too restrictive for future design stages. Publicly accessible replacement green space would be created in locations at car park B and Longbridge roundabout when the temporary construction compounds are removed to compensate for any loss of green infrastructure and space, representing a benefit to the local community, Gatwick staff and visitors and biodiversity.</p>	<p><b>ES Appendix 8.8.1, Outline Landscape and Ecology Management Plan</b>  <a href="#">[APP-113]</a></p> <p><b>Design and Access Statement Volumes 1 to 5</b> [APP-253 to APP-257]</p>	
<p><b>Other</b></p>					
<p><i>There are no other issues relating to topic in this Statement of Common Ground.</i></p>					

2.15. Major Accidents and Disasters

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

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

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

2.16. Noise and Vibration

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

Table 2.16 Statement of Common Ground – Noise and Vibration Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground					
<b>Assessment methodology</b>					
2.16.2.1	Air noise - Threshold and scope of LOAELs and SOAELs	The ES only considers the Leq metric for LOAELs and SOAELs. In doing so it makes reference to national policy. The consideration only of Leq as a metric is too narrow and other metrics should be applied to the decision processes within the project to inform impact and mitigation. In determining the LOAELs and SOAEL more recent data, including planning decisions and revised health assessment criteria need to be applied. The consideration only of the Leq metric does not represent all the effects of air noise.  <b>Updated position (Deadline 1):</b> The air noise LOAEL for daytime and night-time periods are defined in national policy. Justification for the air noise SOAELs should be provided.	The assessment follows current policy and guidance so that all air noise effects are assessed. The awakenings study provided in ES Appendix 14.9.2 provides additional assessment of the effects across the district.	<b>ES Appendix 14.9.2 Air Noise Modelling [APP-172]</b>	Not Agreed
2.16.2.2	Air noise - No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary LAmax, overflight, Lden and Lnight 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.  <b>Updated position (Deadline 1):</b> Supplementary noise metrics should be used supplement the primary metric assessment to identify likely significant effects.	Paragraph 14.4.79 of the ES explains: <i>The assessment of significance is based primarily on the predicted levels and changes in the primary noise metrics and the factors described above, but additional noise metrics (the secondary noise metrics) are used to provide more detail on the changes that would arise.</i>	<b>ES Chapter 14: Noise and Vibration [APP-039]</b>	Not Agreed
2.16.2.3	Ground noise - The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment.	Higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience significant noise effects that are identified in the Central Case assessment.	A sensitivity test will be undertaken for the Slower Transition Fleet case for ground noise. The results of this test will be analysed and presented in the form of a technical note that will be shared with the local authorities.	n/a	Under discussion
<b>Assessment</b>					
2.16.3.1	Air noise - Properties that are newly exposed to noise levels exceeding the SOAEL are not identified	It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine compliance with the first aim of the ANPS.  <b>Updated position (Deadline 1):</b> This information should be provided in the ES so it is clear and understandable.	The increase in the population within SOAEL with the Project compared to without the Project in the noisiest year, 2032, can be seen by subtracting the population in Table 14.6.5 (baseline) from those in Table 14.9.7 (with Project). For both day and night, central case fleet and slower transition fleet this gives a population of approximately 100. All properties forecast to be above SOAEL with the Project	<b>ES Chapter 14 Noise and Vibration [APP-039]</b>	Under discussion

			in the noisiest year, 2032, with the slower transition fleet will be offered the Inner Zone noise insulation package consistent with the policy requirement to avoid significant adverse effects on health and quality of life.		
<b>Mitigation and Compensation</b>					
<b>2.16.4.1</b>	Construction noise - Significant construction noise effects	Residual significant construction noise effects should be controlled through mitigation. Insulation will be provided, but it is not clear if this would be sufficient mitigation to reduce significant noise effects.  <b>Updated position (Deadline 1):</b> Clarification is required of construction noise assessment information presented in paragraphs 14.9.5 to 14.9.12 [APP-039] as it does not seem to correlate with the identification of likely significant effects. Alignments and heights of noise barriers used to reduce significant noise effects should be provided and a commitment made to secure provision of noise barriers.	Paragraph 14.9.62 of ES Chapter 14 states: This assessment identifies with mitigation approximately 37 properties where significant effects could arise during daytime construction with no properties identified as likely to require noise insulation for daytime noise. These effects will be mitigated as far as practicable through the measured laid out in the CoCP.  Paragraph 14.9.63 states: For night-time construction, this assessment identified approximately ten residential properties where noise levels could be above SOAEL and noise insulation could be required to avoid significant adverse effects.	<b>ES Chapter 14 Noise and Vibration [APP-039]</b>  <b>ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3)</b>	Under discussion
<b>2.16.4.2</b>	Noise envelope - Annual noise contour limits	Noise contour area limits relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period.	Notwithstanding the explanation provided, annual Lden and Lnight contours are provided for baseline and with Project conditions in Section 14.6 and 14.9 of ES Chapter 14 to illustrate noise changes over the whole year including the winter months.  Section 4 of ES Appendix 14.9.2 provides tables of annual Lden and Lnight.  Figures 14.9.28 and 14.9.39 show annual Lden and Lnight contours.  Para 14.9.136 to 14.9.139 discuss the changes in annual Lden and Lnight contours compared to the changes in summer season Leq 16 hr and Leq 8 hour night contours.  Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements.	<b>ES Chapter 14: Noise and Vibration [APP-039]</b>  <b>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</b>  <b>ES Appendix 6.2.1: Scoping Report Part 1 [APP-092]</b>  <b>ES Appendix 6.2.1: Scoping Report Part 2 [APP-093]</b>  <b>ES Chapter 4: Existing Site and Operation [APP-029]</b>	Under discussion
<b>2.16.4.3</b>	Noise envelope - Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	GAL wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope.	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	<b>ES Appendix 14.9.7 The Noise Envelope [APP-177]</b>	Not Agreed



		<p><b>Updated position (Deadline 1):</b> There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels.</p>	<p>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.</p> <p>Any change to the noise envelope would require a formal review following the processes laid out in Section 8, including consultation and approval of the Secretary of State.</p>		
2.16.4.4	Noise envelope - CAA to regulate the Noise Envelope	<p>To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for host authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope.</p> <p><b>Updated position (Deadline 1):</b> The Host Authorities should be part of an independent group set up to regulate the Noise Envelope.</p>	<p>During consultation with the TWGs and the Noise Envelope Group (NEG) in summer 2022 the local authorities were consulted on the concept and make-up of a “Review Body” which would review and approve the outputs from the noise envelope when it becomes active. GAL’s proposal for a sub-committee of GATCOM was opposed by the LPAs. The suggestion of having Local Authorities as the “Review Body” was also discussed during the NEG meetings and there was concern on the part of Community Representatives regarding there being a conflict of interest between economic benefit in that some councils receive money from the Airport as part of the S106 agreement but are impacted little by the noise from airlines using the airport. There was no clear resolution on the issue within the NEG and GAL subsequently decided that the CAA would be best placed to perform the function of Independent Reviewer as explained in the The Noise Envelope. The Local Authorities can monitor the outputs of the review process and in the case of a breach take enforcement action as appropriate.</p>	ES Appendix 14.9.7 The Noise Envelope <a href="#">[APP-177]</a>	Not Agreed
2.16.4.5	Noise envelope - Adoption of an action plan	<p>A breach would be identified for the preceding year, with an action plan in place for the following year. Consequently, it would be two years after a breach before a plan to reduce the contour area would be in place.</p> <p><b>Updated position (Deadline 1):</b> Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	<p>As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year’s performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking</p>	ES Appendix 14.9.7: The Noise Envelope <a href="#">[APP-177]</a>	Not Agreed

			into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.		
2.16.4.6	Noise envelope - Two consecutive breaches to occur before capacity declaration restrictions	<p>24 months of breach would be required before capacity declaration restrictions for the following were adopted. Consequently, it would be three years after the initial breach before capacity restrictions were in place.</p> <p><b>Updated position (Deadline 1):</b> Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.	<b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>	Not Agreed
2.16.4.7	Noise envelope - Prevention of breaches	<p>No details are provided on what kind of actions are proposed to achieve compliance in the event of a forecast breach.</p> <p><b>Updated position (Deadline 1):</b> There is concern that, if a breach is identified in a previous year, it would be two years after the breach before any action could be implemented. Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	Some of the noise management measures available are discussed in Section 2 of ES Appendix 14.9.2 Air Noise Modelling, and Section 7 of the Noise Envelope describes restrictions on capacity declaration as a result of the noise envelope.	<p><b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a></p> <p><b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a></p>	Not Agreed
2.16.4.8	Noise envelope - Prevention of breaches	<p>Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the noise envelope.</p> <p><b>Updated position (Deadline 1):</b> Thresholds should be adopted so action can be taken if they are breached to prevent limits being breached.</p>	As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.	<b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>	Not Agreed

<p><b>2.16.4.9</b></p>	<p>Noise envelope - Capacity declaration restrictions as a means of managing aircraft noise</p>	<p>This would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year.</p> <p><b>Updated position (Deadline 1):</b> Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	<p>As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.</p>	<p><b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a></p>	<p>Not Agreed</p>
<p><b>2.16.4.10</b></p>	<p>Noise insulation scheme - How would the scheme roll out</p>	<p>How would the noise insulation scheme prioritise properties for provision of insulation.</p> <p><b>Updated position (Deadline 1):</b> Details of the noise insulation roll out should be provided including a market test the availability of contractors and insulation materials.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p>	<p><b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a></p>	<p>Under discussion</p>

			<p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>		
<b>2.16.4.11</b>	Noise insulation scheme - How would properties be eligible	Residents of properties within the inner zone will be notified within 6 months of commencement of works; however, it is not clear what noise contours eligibility would be based upon	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be</p>	<b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>	Under discussion

			clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.		
<b>2.16.4.12</b>	Noise insulation scheme - Provision of different types of noise insulation	<p>Is noise insulation in the Outer Zone restricted to ventilators or will the occupier have flexibility to make alternative insulation improvements? Ongoing maintenance costs should not be borne by the householder.</p> <p><b>Updated position (Deadline 1):</b> Ventilators do not deal with the issue of overheating, which would occur if windows are required to be closed to achieve good acoustic conditions.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>	<b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>	Under discussion

<p><b>2.16.4.13</b></p>	<p>Noise insulation scheme - Measurement of ground noise to identify eligibility</p>	<p>It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.</p> <p><b>Updated position (Deadline 1):</b> Two locations are mentioned for monitoring, but there is no information regarding how other locations be screened for monitoring.</p> <p>No information is provided on what the trigger for noise monitoring would be.</p> <p>Properties that may experience cumulative levels of air and ground noise that would include them in the NIS Outer Zone should be monitored and offered an insulation package.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>	<p><b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a></p>	<p>Under discussion</p>
<p><b>2.16.4.14</b></p>	<p>Noise insulation scheme - How will effective insulation requirements be determined</p>	<p>It is unclear if a property in the Inner Zone would be assessed to determine the most effective means of insulation.</p> <p><b>Updated position (Deadline 1):</b> Response does not address the stakeholder position.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is</p>	<p><b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a></p>	<p>Under discussion</p>

			<p>considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>		
2.16.4.15	Noise insulation scheme - Noise insulation for community buildings	<p>Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings (e.g. care homes, places of worship, village halls, hospitals etc.) would be eligible for noise insulation.</p> <p><b>Updated position (Deadline 1):</b> Response does not address the stakeholder query.</p>	<p>Paragraph 4.1.10 and 4.1.11 of ES Appendix 14.9.10 outline the process to prioritise the scheme with the Inner Zone first. Further detail on implementation of the NIS is being prepared and will be shared with the TWG. Further prioritisation will use higher noise level bands to implement the scheme to those most affected first, albeit it is considered that there is sufficient time for all properties in the inner zone to receive noise insulation before operations commence.</p> <p>Paragraph 4.1.13 of ES Appendix 14.9.10 explains: We propose to base the new NIS on the worst-case end of this</p>	<b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>	Under discussion

			<p>range, associated with the Slow Transition Fleet. As such, we propose to use the forecast 2032 Leq contour area to set the geographical boundary for our enhanced NIS.</p> <p>The noise insulation package offered in the Outer zone will be acoustic ventilators, and acoustic glazing where necessary to upgrade single glazing, to noise sensitive rooms. There will be some flexibility as to how the package is decided.</p> <p>Paragraphs 5.1.1 and 5.1.2 of ES Appendix 14.9.10 outline the noise insulation scheme for schools, and the kind of measures that will be offered, noting that details will be developed on a case by case basis. The scheme is intended only for community buildings that are sensitive to noise because they are used for teaching.</p> <p>Paragraph 4.1.11 of ES Appendix 14.9.10 explains how eligibility for the Inner Zone noise insulation scheme will if necessary be extended by measurement of cumulative ground and air noise. Two small areas are noted as possible candidates but the vast majority of eligibility will be clear from air noise contours with the option to extend this if noise disturbance is reported by residents beyond. Measurements would be carried out by installing noise monitoring equipment in the relevant area.</p>		
2.16.4.16	Noise insulation scheme - Properties that have already received insulation	It is not clear if properties that have already received insulation would be eligible for upgraded noise insulation as part of the new scheme.	That is the case. An appendix to the NIS will be provided giving further details on its implementation and clarifying this.	n/a	Under discussion
2.16.4.17	Noise Envelope	<p>The Noise Envelope design process did not follow best practice guidance set out in CAP1129 or good practice from other airports. SCC would have expected local authorities and stakeholder groups to have been involved in the envelope design from the outset and prior to the statutory consultation in September 2021, with the process of examining all noise envelope options, metrics and limits from a first principles basis. The Civil Aviation Authority (CAA) recognises the potential need for independent, technical advisory third parties to assist stakeholders to reach agreement, but there was no such involvement at Gatwick.</p> <p><b>Updated position (Deadline 1):</b> The Noise Envelope in its current state is not policy compliant and is not for purpose.</p>	<p>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 provides an account of the 12 two-hour meetings dedicated to the Noise Envelope Group process that were held between 26 May and 11 October 2022 between the airport and stakeholders. It also provides copies of the considerable volume of written material that was exchanged between the airport and the Noise Envelope Group stakeholder during this consultation. A summary of wider consultation undertaken since 2019 is provided at Section 4.2 of ES Appendix 14.9.7 The Noise Envelope. The local authorities have employed AECOM to</p>	<p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a></p> <p>Section 4.2 of <b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a></p>	Not Agreed



			provide them with independent expert advice on aircraft noise using funding provided by GAL.		
2.16.4.18	Noise Envelope	<p>It must be demonstrated how the noise benefits of future aircraft technology are shared between the airport and local communities, as required in the Aviation Policy Framework.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.</p>	<p>Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022.</p> <p>An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted '<i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i>'.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections 6.5 and 6.6 of the Noise Envelope Document.</p>	ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]	Not Agreed
2.16.4.19	Noise Envelope	The Noise Envelope should provide certainty about the levels of noise which can be expected in the future in accordance with CAP 1129; however, the Noise Envelope allows for noise contour limits to increase as a result of airspace changes and new aircraft	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	ES Appendix 14.9.7 The Noise Envelope [APP-177]	Not Agreed

		<p>technology. There should be no allowance for noise contour area limits to increase as a result of these factors.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.</p> <p>There should be no allowance for Noise Envelope limits to increase to give certainty to local communities on future noise levels</p>	<p>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.</p> <p>Any change to the noise envelope would require a formal review following the processes laid out in Section 8, including consultation and approval of the Secretary of State.</p>		
2.16.4.20	Noise Envelope	<p>There is no mechanism for local authorities to review Noise Envelope reporting, enforce limit breaches or review any aspects of the Noise Envelope.</p> <p><b>Updated position (Deadline 1):</b> The local Authorities should be part of an independent group set up to regulate the Noise Envelope</p>	<p>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.</p> <p>Any change to the noise envelope would require a formal review following the processes laid out in Section 8, including consultation and approval of the Secretary of State.</p>	ES Appendix 14.9.7 The Noise Envelope [APP-177]	Not Agreed
2.16.4.21	Noise Envelope	<p>Thresholds should be adopted into the Noise Envelope with the intention that action can be implemented prior to a contour limit breach occurring.</p> <p><b>Updated position (Deadline 1):</b> Thresholds should be adopted so action can be taken if they are breached to prevent limits being breached.</p>	<p>As described in ES Appendix 14.9.7: The Noise Envelope each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast, in addition to providing for actions to be taken in the unlikely event of actual breaches.</p>	ES Appendix 14.9.7: The Noise Envelope [APP-177]	Not Agreed
2.16.4.22	Noise Envelope	<p>The Noise Envelope thresholds are not agreed. It is not appropriate to use the slow transition case to define noise contour limits. There is no incentive to push the transition of the fleet to quieter aircraft technology.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise</p>	<p>Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022.</p>	ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]	Not Agreed

		benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.	<p>An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted '<i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i>'.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections ,6.5 and 6.6 of the Noise Envelope Document.</p>		
2.16.4.23	Noise Envelope	<p>Capacity declaration restrictions are a weak form of noise control as new slots within that capacity can be allocated. Slot restriction measures should be adopted.</p> <p><b>Updated position (Deadline 1):</b> Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</p>	As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned an implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair	<b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>	Not Agreed

			balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.		
2.16.4.24	Noise Envelope	<p>The DCO should provide for 5 yearly (or more frequent) reviews of the Noise Envelope. A first review of the contour 9 years after opening or when 382,000 Air Traffic Movements is achieved provides limited incentive for GAL to achieve a faster fleet transition and secure noise benefits.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. The Noise Envelope is not policy compliant and is not fit for purpose.</p>	<p>Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government’s Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022.</p> <p>An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines’ control. The York Aviation review of the PEIR for the Local Authorities noted ‘<i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i>’.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections ,6.5 and 6.6 of the Noise Envelope Document.</p>	ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]	Not Agreed
2.16.4.25	Noise Envelope	The Noise Envelope group set up following consultation should have had an independent chair rather than being chaired by an	We do not accept that the chairing of the Noise Envelope Group by GAL in any way restricted the scope of its discussions or its reporting of the issues raised. Moreover,	n/a	Not Agreed

		airport employee. This would have given greater confidence in the process to community and local authority stakeholders.	whilst the Noise Envelope Group itself was chaired by a GAL member of staff, the two sub-groups that fed into it were chaired by independent people rather than GAL employees. The local sub-group was chaired by the chair of the Noise Management Board Community Noise Group and the Aviation Sub-group was chaired by the chair of the Noise Management Board Noise Delivery Group.		
2.16.4.26	Noise Envelope	<p>SCC considers there are substantial deficiencies in the Noise Envelope that need to be addressed before it could be considered fit for purpose. The proposed monitoring, review and enforcement of the Noise Envelope is not agreed. SCC would like to see an environmentally managed approach to implementation and enforcement.</p> <p><b>Updated position (Deadline 1):</b> The Noise Envelope is not policy compliant and is not fit for purpose.</p>	<p>GAL has consulted the local authorities and stakeholders to seek views on the Noise Envelope and develop a proposal taking account of those views that meets the policy requirements and follows CAA guidance.</p> <p>See Row 13.11 of this table for the response to concerns regarding the noise envelope reviewer.</p>	<p><b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a></p>	Not Agreed
2.16.4.27	Noise insulation scheme	<p>The air noise insulation scheme is only based on average Leq contours rather than single mode contours and is confined to Leq metrics.</p> <p><b>Updated position (Deadline 1):</b> Supplementary noise metrics should be used supplement the primary metric assessment to identify likely significant effects</p>	<p>This issue has been discussed in the TWGs. GAL responded to a technical note issued on behalf of Local Authorities on 6th January 2023 in relation to noise metrics. The response was circulated to Local Authorities on 3rd February 2023 as part of papers for Noise TWG 4 of 8th February 2023. The issue is addressed directly on page 374 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>Single mode contours are not included in the ES for the reasons discussed with the TWG as noted in the column to the left. Para 14.9.150 and 14.9.151 of the ES Chapter 14: Noise and Vibration describe 7 Community Representative Locations chosen for describing noise changes. Paras 14.9.152 to 14.9.158 of ES Chapter 14 describe the noise changes that the NRP will produce at these 7 locations, including on easterly days and westerly days, using the data in terms of Leq, 16 hr, Leq 8 hr, N65, and N60 for average mode, westerly mode and easterly mode, provided for 2032 with the Project, the 2032 base and 2019 base, for the central case and slower transition fleet in 14 tables 4.2.1 to 4.2.14 of ES Appendix 14.9.2: Air Noise Modelling.</p> <p>The Government has been consulting on noise insulation schemes as part of its future aviation policy. In its consultation Aviation 2050 — the future of UK aviation (December 2018) it proposed a number of measures including: a) extending the noise insulation policy threshold</p>	<p><b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a></p> <p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a></p> <p><b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a></p>	Not Agreed

			beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr. This is the average mode Leq 16 hr not single mode. The proposed scheme follows government guidance, in terms of the metric with which to define a noise insulation scheme, and in addition offers it at lower noise levels. For an airport such as Gatwick that has an uneven split between easterly and westerly operations in the summer (roughly 70/30) it would be unfair to use single mode contours that arise on 30% of days for some but 70% of say for others.		
2.16.4.28	Noise insulation scheme	There are concerns about the noise level at which the different schemes start.	Please clarify these concerns. The Inner zone addresses noise levels above SOAEL, the Outer zone is set at daytime noise levels 9 dB below the SOAEL.	n/a	Under discussion
2.16.4.29	Noise insulation scheme	A lack of measures to prevent overheating in noise insulated homes especially in the summer months at night.  <b>Updated position (Deadline 1):</b> Ventilators provide a flow of fresh air but do not provide any cooling so this point is not addressed.	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.	n/a	Not Agreed
2.16.4.30	Noise insulation scheme	There appears to be no provision for the ongoing maintenance / replacement costs of the noise insulation with this cost simply passed to the owner.  <b>Updated position (Deadline 1):</b> Points are still to be agreed with stakeholders. It should be stressed that overheating is NOT addressed by acoustic ventilators, which only introduce fresh air and do not have any cooling capability.	The noise insulation scheme proposed was presented as 4 slides and discussed in the TWG on 4 <sup>th</sup> January 2023 and has been discussed with the TWG.  i) The noise thresholds applied are in line with good practice and exceed government policy requirements. This issue has been responded to at Row 13.100 of Table 13 in Appendix 1.  ii) 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. This issue has been responded to at Row 13.102 of Table 13 in Appendix 1.  iii) The running costs of acoustic ventilators have been discussed with the TWG and are very low particularly if only used in hot weather.  iv) Everyone is eligible for the scheme whether or not they have qualified previously. This will be further clarified in a technical note on	<b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>	Under discussion

			implementation of the scheme and shared with the TWG.		
<b>Other</b>					
2.16.5.1	Construction Noise	<p>Range of issues subject to clarification.</p> <p><b>Updated position (Deadline 1):</b> Clarification is required of construction noise assessment information presented in paragraphs 14.9.5 to 14.9.12 [APP-039] as it does not seem to correlate with the identification of likely significant effects. Alignments and heights of noise barriers used to reduce significant noise effects should be provided and a commitment made to secure provision of noise barriers.</p>	Please clarify what these issues are.	n/a	Under discussion
2.16.5.2	Noise envelope - Sharing the benefits	<p>No details on how benefits of new aircraft technology would be shared between the airport and local communities are provided. This is a fundamental part of the noise envelope.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.</p>	<p>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.</p> <p>GAL has consulted with the TWG since August 2021, explaining our proposed methodology and emerging finds and approach to mitigation. While it is not wholly clear what aspect of policy HDC 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.</p>	<b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [AS-023]	Not Agreed
2.16.5.3	Noise envelope - Slow fleet transition noise contour area limits	<p>There is no incentive to push the transition of the fleet to quieter aircraft technology.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits has not been removed from national aviation policy. GAL do not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.</p>	<p>Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022.</p> <p>An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>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'</p>	<b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [APP-175]	Not Agreed

			<p>control. The York Aviation review of the PEIR for the Local Authorities noted <i>'We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case'</i>.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections ,6.5 and 6.6 of the Noise Envelope Document.</p>		
--	--	--	--	--	--



2.17. Planning and Policy

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

**Table 2.17 Statement of Common Ground – Planning and Policy Matters**

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

2.18. Project Elements and Approach to Mitigation

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

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

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.19.1.1	Unlike other airport expansion schemes there is no attempt to consider environmental impacts holistically	As part of their DCO application Luton Airport have proposed a Green Controlled Growth approach, which places controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise and surface access. If any limit is breached, further growth will be stopped, mitigation will be required and ultimately, airport capacity would be constrained until environmental performance returned below the limits. No comparable approach is proposed at Gatwick.	The Applicant has included as part of the Application the mitigation identified as being necessary under the Environmental Statement to address the potential adverse impacts of the Project. Specific to those environmental topics and impacts which are considered most sensitive to airport growth (noise, carbon, surface access and air quality), the relevant mitigation is primarily contained within the Noise Envelope, Surface Access Commitments and Carbon Action Plan documents, each secured as requirements to, and to be certified as part of, the draft DCO (with additional air quality mitigation proposed to be included within the s106 Agreement). Each of those 'control' documents sets out bespoke independent governance, monitoring and mitigation arrangements to ensure the proper functioning and delivery of the underlying mitigation/commitments.	<p><b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a></p> <p><b>ES Appendix 5.4.1 Surface Access Commitments</b> <a href="#">[APP-090]</a></p> <p><b>ES Appendix 5.4.2 Carbon Action Plan</b> <a href="#">[APP-091]</a></p> <p><b>Draft DCO</b> (Doc Ref. 2.1)</p>	Not Agreed
2.19.1.2	Inclusion of hotels as authorised development	<p>Further justification requested in relation to inclusion of Work nos 26, 27 and 28 as authorised development.</p> <p><b>Updated position (Deadline 1):</b> It is not clear to the Council how these hotel-related Works are "associated development", per section 115 of the Planning Act 2008. There does not appear to be an explanation in the EM. A satisfactory explanation is needed. Moreover, the Council is concerned about the prospect of these works evading proper environmental controls. Owing to these facts, the Council considers these Works should be deleted from the dDCO.</p>	An explanation of hotel and office provisions as Associated Development within the Project was provided at the Planning TWG in November 2022 justified against the Planning Act 2008 and Government's supporting guidance, and no subsequent queries were raised by the LAs. A response was also provided on this against Item 3.93 in the October 2023 versions of the Issues Trackers.	n/a	Under discussion
2.19.1.3	Finalisation of Section 106 Agreement	<p>Negotiation on the S106 has not yet started.</p> <p><b>Updated position (Deadline 1):</b> Draft S106 was first received 1.2.24.</p>	<p>GAL will issue a draft of the Section 106 Agreement in connection with the NRP to the local authorities. GAL looks forward to receiving initial feedback on the first draft and continuing engagement with the parties to ensure a final, signed version has been submitted by the close of the examination.</p> <p><b>Updated position (Deadline 1):</b> A draft Section 106 Agreement has been shared with the Local Authorities and</p>	n/a	Under discussion

			discussions are ongoing. The draft legal agreement is to be submitted at Deadline 2.		
--	--	--	--	--	--

2.19. Socio-Economics and Economics

2.19.1 Table 2.20 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
<b>Baseline</b>					
2.19.1.1	Gatwick Construction Workforce distribution technical note - Private rented sector (PRS) accommodation	<p>Details are provided of allocation of NHB workers by local authority vs supply of private rental sector beds. Table 6-5 presents PRS bed supply for 2021 by local authority but it isn't clear how these figures have been derived given Paragraph 3.5.2 advised the data on bedrooms was gathered from the 2011 Census. In addition, whilst the figures present PRS bed supply, they do not advise on the availability of accommodation. In the light of a declining supply of rental accommodation and feedback from local authorities on limited availability this would seem to be a significant omission.</p> <p><b>Updated position (Deadline 1):</b> The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment. Local authorities need to input into the assessment of temporary accommodation to provide an up-to-date picture of availability.</p>	<p>Paragraph 3.5.4 explains how the estimate has been derived.</p> <p>Table 6.5 shows that even if all NHB workers sought PRS accommodation (which they will not – some will seek B&amp;Bs) the highest demand as a share of stock in any local authority is 0.68%. This is well below any reasonable estimate of vacancy rates in the PRS.</p> <p>The English Housing Survey reports vacancy rates in the PRS that are over twice as high as in the social rented and owner occupied sectors and in 2019/20 (the last available data) these were 10%.</p>	<b>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note</b> [APP-199].	Under discussion
2.19.1.2	Out of date baseline data sources	<p>Several of the baseline data sources are out of date which is a concern given the reliance on these sources to inform the various assessments.</p> <p><b>Updated position (Deadline 1):</b> The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment</p>	<p>The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions are expected to rebound to pre-pandemic levels before the Project's commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability.</p>	n/a	Under discussion
2.19.1.3	Out of date baseline data sources	<p>The need to revisit the approach to estimating construction employment and forecasting availability of temporary accommodation given the reliance on old data and not accounting for local variations.</p> <p><b>Updated position (Deadline 1):</b> The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p> <p>The Applicant should undertake an assessment of impacts at local authority level to ensure local implications of the Scheme are picked up.</p>	<p>Paragraph 7.5.1 talks about proportions not numbers. The absolute level of demand is significantly lower than the supply of stock.</p> <p>The proportions being delivered are higher than the proportion of demand from workers.</p> <p>In addition, many of the workers will already be resident in the area so will not constitute new housing demand.</p> <p>The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>	<p><b>Consultation Issues Tables Autumn 2021</b> [APP-219]</p> <p><b>Consultation Issues Tables Summer 2022</b> [APP-221]</p> <p><b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> [APP-201]</p>	Under discussion

			As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.		
2.19.1.4	Out of date baseline data sources	<p>The assessment of housing and population relies on out-of-date data and should be using up-to-date information given it will impact on labour supply/housing conclusions. The assessment also makes optimistic projections on housing and doesn't appear to fully consider existing constraints.</p> <p><b>Updated position (Deadline 1):</b> The Applicant should source up-to-date for all data sources used in the chapter to avoid adopting an inconsistent approach to the assessment.</p>	The analysis presented in the PEIR was primarily based on 2019 data (i.e. pre-Covid) given that the economy and wider socio-economic conditions are expected to rebound to pre-pandemic levels before the Project's commencement. For the same reasons, the same approach is carried over in the ES, however, where appropriate, relevant data sources such as labour market and employment indicators have been updated to reflect the latest available position based on data availability.	n/a	Under discussion
<b>Assessment Methodology</b>					
2.19.2.1	Assessment methodology - No consideration of effects at a local authority level.	<p>There is no assessment of effects undertaken at a local authority level. The impacts of the project on key variables such as employment, labour market, housing (including affordable), social infrastructure and temporary accommodation need to be assessed.</p> <p><b>Updated position (Deadline 1):</b> An assessment of impacts is required at the local authority level to understand local implications of the Scheme</p>	<p>Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic.</p> <p>Wider effects of the construction phase have been assessed in terms of potential impacts on the construction supply chain measured relative to the scale of construction sector enterprises (as opposed to employment which is used for direct effects only) in each of the assessment areas.</p> <p>GAL's response reiterated that an assessment of the potential demand for housing during the construction phase has been added to the Assessment of Population and Housing Effects.</p> <p>As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.</p>	<p><b>ES Chapter 17 Socio-Economics</b> <a href="#">[APP-042]</a></p> <p><b>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note</b> <a href="#">[APP-199]</a></p> <p><b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a>.</p> <p><b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a></p>	Under discussion
2.19.2.2	Assessment methodology - Assessment of impacts on property prices	An assessment of project impact on property values has been scoped out of the assessment despite PINS advice on the issue (PINS ID 4.10.3). Unless subsequently agreed otherwise by PINS, an assessment of project impacts on property prices is still required.	GAL has not included a specific assessment of effects on property prices in the ES for the reasons set out in Table 17.4.2 of ES Chapter 17 Socio-Economic (APP-042).	<b>ES Chapter 17 Socio-Economic</b> <a href="#">[APP-042]</a> .	Under discussion

		<p><b>Updated position (Deadline 1):</b> PINs advised that the applicant should undertake an assessment of impacts on property prices. Applicant advised at a TWG meeting that they would be undertaking this assessment. Applicant has acknowledged in the ES there will be an adverse impact on property prices.</p>	<p>Impacts on residential property values have not been included in scoping for other comparable DCO projects (e.g. Heathrow, Manston, Luton).</p>		
2.19.2.3	Gatwick Construction Workforce distribution technical note – distance travelled to work date	<p>Additional information is requested in a number of areas:</p> <ul style="list-style-type: none"> <li>Does the Construction Industry Training Board data in terms of average distance workers travel to sites for each region of the UK adequately consider differences that exist within local geographies.</li> <li>Where Census 2011 data is being relied upon for analysis, there needs to be acknowledgement this could affect the accuracy of home-based (HB) and non-home based (NHB) worker estimations.</li> </ul> <p>The gravity model used to identify the split of HB and NHB workers does not appear to take account of current local labour supply constraints locally.</p> <p><b>Updated position (Deadline 1):</b> The Applicant has not answered the question. The Applicant should undertake an assessment of impacts at local authority level.</p>	<p>This is explained in the Gatwick Construction Workforce Distribution Note. The average proportion of non-home based workers in England is 5% and in the South East is 7%. A NHB share of 20% therefore is conservative.</p> <p>There is no evidence of a shortage of construction workers such that the project would be unable to recruit HB workers. GAL will seek to employ contractors who have a workforce and these will include local contractors.</p> <p>Whilst the project itself is large, its demand for workers is small in the context of the size of the construction workforce</p>	<p><b>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note</b> <a href="#">[APP-199]</a>.</p>	Under discussion
2.19.2.4	Sensitivity and magnitude gradings	<p>The need to revisit sensitivity and magnitude gradings for several assessments in the socio-economic chapter.</p> <p><b>Updated position (Deadline 1):</b> Council has concerns related to sensitivity and magnitude criteria for several socio-economic receptors.</p>	<p>As shown in ES Chapter 17 Socio-Economics, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment, however proposed thresholds were presented during Topic Working Groups for comment.</p>	<p><b>ES Chapter 17 Socio-Economics</b> <a href="#">[APP-042]</a></p>	Under discussion
2.19.2.5	Assessment of socio-economic effects at local authority level	<p>The assessment of socio-economic effects has been undertaken at different geographical levels but has not assessed impacts at a local authority level. This is despite ongoing issues concerning labour supply, housing (including affordable) and temporary accommodation in the local authorities located close to the project. As a result of this approach, the assessment does not identify specific impacts on these areas.</p> <p><b>Updated position (Deadline 1):</b> An assessment of impacts is required at the local authority level.</p>	<p>A range of geographies are used on the basis that significant effects on socio-economic receptors might differ in geography depending on the receptor. This includes the Project Site Boundary, Local Study Area, North West Sussex Functional Economic Market Area (also the same as the North West Sussex Housing Market Area, 'NWS HMA'), Labour Market Area and Six Authorities Area. Reasoning and justification for these is given within the Socio-Economic Chapter. Local authority level outputs are also provided. A further study area has also been adopted for the purposes of assessing housing effects, as housing effects are felt across housing market areas which are not reflected in any of the other geographies. In the Summer 2022 consultation it was commented the analysis did not address previous concerns about most of the demand for housing being concentrated in the NWS HMA. Subsequently, for the assessment of population and</p>	<p><b>Consultation Report Annex A, Consultation Issues Tables Autumn 2021</b> <a href="#">[APP-219]</a></p> <p><b>Consultation Report Annex C, Consultation Issues Tables Summer 2022</b> <a href="#">[APP-221]</a></p> <p><b>ES Chapter 17 Socio-Economics</b> <a href="#">[APP-042]</a> paras 17.4.8-13</p> <p><b>ES Socio-Economic Effects Figures</b> <a href="#">[APP-052]</a></p>	Under discussion

			housing effects, outputs are given at a local authority level within Annexes including for the key scenarios a total specifically for the NWS HMA.	<p><b>ES Appendix 17.6.1 Socio-Economic Data Tables</b> <a href="#">[APP-197]</a></p> <p><b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a></p>	
<b>Assessment</b>					
<b>2.19.3.1</b>	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area.</p> <p>The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</p> <p><b>Updated position (Deadline 1):</b> See joint authority response to this issue</p>	<p>Catalytic impacts refers to the economic activity of firms that are not in the indirect or induced footprint of the airport choosing to locate near the airport because of the connectivity that it offers. The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic.</p> <p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>We are arranging a technical working group meeting to address these issues in early January 2024.</p>	<p><b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>.</p> <p><b>Needs Case Appendix 1 - National Economic Impact Assessment</b> <a href="#">[APP-251]</a>.</p>	Under discussion
<b>2.19.3.2</b>	Wider economic benefits	<p>The wider economic benefits of the project have been overstated due to the failure to adequately distinguish the demand that could be met at Gatwick from the demand which could only be met at Heathrow and the economic value that is specific to operations at Heathrow. The methodology by which the wider catalytic impacts in the local area has been assessed is not robust.</p> <p><b>Updated position (Deadline 1):</b> See joint authority response to this issue</p>	<p>Catalytic impacts refers to the economic activity of firms that are not in the indirect or induced footprint of the airport choosing to locate near the airport because of the connectivity that it offers. The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic.</p>	<p><b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>.</p> <p><b>Needs Case Appendix 1 - National Economic Impact Assessment</b> <a href="#">[APP-251]</a>.</p>	Under discussion

			<p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>We are arranging a technical working group meeting to address these issues in early January 2024.</p>		
2.19.3.3	Economic benefits	<p>As a result of capacity overstatement, it also means the economic benefits are overstated.</p> <p><b>Updated position (Deadline 1):</b> See joint authority response to this issue</p>	<p>Catalytic impacts refers to the economic activity of firms that are not in the indirect or induced footprint of the airport choosing to locate near the airport because of the connectivity that it offers. The catalytic effect is derived as a residual from total net impacts and footprint impacts. Total net impacts are estimated on the basis of an elasticity relationship we have derived between air traffic and local employment. This elasticity relationship represents a net relationship as it accounts for the net increase in local employment generated by an increase in air traffic.</p> <p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>We are arranging a technical working group meeting to address these issues in early January 2024.</p>	<p><b>ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].</b></p> <p><b>Needs Case Appendix 1 - National Economic Impact Assessment [APP-251].</b></p>	Under discussion
2.19.3.4	Assessment of significant effects	<p>Queries remain in relation to the significance of effects during the first year of operation, operational effects and cumulative effects. These include overlap with other schemes and potential labour</p>	<p>As shown in ES Chapter 17 Socio-Economics, the thresholds applied vary across receptors and geographies. These are ultimately based on a professional judgment,</p>	<p><b>ES Chapter 17 Socio-Economics [APP-042]</b></p>	Under discussion



		supply issues, magnitude scoring used and need for assessment at local authority level.  <b>Updated position (Deadline 1):</b> Assessments require revisiting and an assessment at local authority level is required.	however proposed thresholds were presented during Topic Working Groups for comment.		
2.19.3.5	Assessment of population and housing effects – vacant properties	GAL provides an analysis of vacant properties, which implies that bringing these back into use will help meet the demand generated by non-home based workers. There is no analysis of why these properties are vacant, length of time vacant and barriers to bringing them back into use.  <b>Updated position (Deadline 1):</b> Applicant hasn't answered the question.	To determine the potential housing effects, the number of NHB workers (ie those who will temporarily migrate to the area) allocated to each local authority area has been compared with the total number of bed spaces available in the private rented sector. Table 6.1.1 of ES Appendix 17.9.3 sets out the distribution of NHB construction works (at peak) within the key authorities. The numbers in any single local authority are very small and their lengths of stay will be relatively short. In Crawley the peak number of NHB workers is estimated to be only 115 and not all of these will seek PRS accommodation.	<b>ES Chapter 17 Socio-Economic</b> [APP-042].  <b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> [APP-201].	Under discussion
2.19.3.6	Assessment of population and housing effects – impacts on affordable housing	Paragraph 7.5.1 of the Assessment of population and housing effects recognises that the project is likely to generate demand for affordable rented housing which is greater than the number of homes in the existing stock. If this exercise is done at a local authority level, then the figures are very different and the true impacts local impact could be seen.  The assessment concludes that despite the demand from the project being skewed towards affordable housing, there are unlikely to be impacts on affordable housing beyond what is emerging or planned for. Given that affordable housing delivery does not currently meet need, the conclusion does not appear well founded.  <b>Updated position (Deadline 1):</b> Project will increase pressures on supply of affordable housing. Applicant should undertake assessment at local authority level.	Paragraph 7.5.1 talks about proportions not numbers. The absolute level of demand is significantly lower than the supply of stock.  The proportions being delivered are higher than the proportion of demand from workers.  In addition, many of the workers will already be resident in the area so will not constitute new housing demand.  The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.  As set out in response to point 3.4, impacts are assessed at the appropriate functional spatial scale and with additional information also provided at local authority level.	<b>Consultation Report Annex A, Consultation Issues Tables Autumn 2021</b> [APP-219],  <b>Consultation Report Annex C, Consultation Issues Tables Summer 2022</b> [APP-221]  <b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> [APP-201]	Under discussion
<b>Mitigation and Compensation</b>					
2.19.4.1	Employment and Skills Business Strategy - Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to Implementation Plan is not identified	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why GAL is unable to provide further details within the ESBS in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs	Please refer to ES Appendix 17.8.1 Employment, Skills and Business Strategy for details.  The plan will include more specific detail on the objectives, initiatives and activities, targets, milestones, implementation processes and partners, including how objectives will be met at the local level. The approach to monitoring and evaluation of actions and impacts will be included. GAL	<b>ES Appendix 17.8.1 Employment, Skills and Business Strategy</b> [APP-198].	Under discussion

		<p>offered through the DCO vs. provision and outputs offered in a Business as Usual (BAU) scenario. Furthermore, the ESBS does not set out any process for how the Implementation Plan would be developed.</p> <p><b>Updated position (Deadline 1):</b> More detailed information is required in the ESBS as set out in the LIR.</p>	<p>recognises that the skills, employment and business growth and productivity fields are dynamic and fast-moving in terms of national and local policy responses, skill needs and demands and technological changes. The project will be delivered over a period of 15+ years. Thus, the strategy and implementation plan will need to incorporate capacity for the projects and associated targets and outcomes to flex and change in response effectively to changing circumstances as required.</p> <p>The ESBS Implementation Plan will describe how GAL will collaborate with partners to define and implement a clear regional 'identity' and promotion strategy. Initial scoping research, informed by a partner workshop, has just completed and the recommendations will inform the Implementation Plan.</p>		
2.19.4.2	Gatwick Community Fund	<p>Lack of commitment on Gatwick Community Fund amounts.</p> <p><b>Updated position (Deadline 1):</b> Draft S106 first shared 1.2.24.</p>	<p>This will be set out in the S106 agreement.</p> <p><b>Updated position (Deadline 1):</b> A draft Section 106 Agreement has been shared with the Local Authorities and discussions are ongoing. The draft legal agreement is to be submitted at Deadline 2.</p>	n/a	Under discussion
2.19.4.3	Economic benefits	<p>There remains uncertainty as to how Surrey's residents will benefit and insufficient detail as to how economic benefits for Surrey's residents will be secured and delivered.</p> <p><b>Updated position (Deadline 1):</b> The Applicant refers to Crawley residents in its response which isn't relevant to the question.</p> <p>The Applicant should undertake an assessment at local authority level to determine local impacts. They should also provide further details of the benefits of the Scheme for Surrey residents.</p>	<p>The assessment sets out the likely distribution of new employees, including Crawley residents, based on the current distribution of employees. Crawley residents will not need to do anything special in order to be able to benefit.</p> <p>GAL proposes enhancing the ability of target groups to access employment through the ESBS. The Implementation Plans underneath the ESBS will set out how measures will be targeted (by area or group) and these will be agreed and delivered in partnership with local partners including CBC.</p> <p>It is confirmed within the Socio-Economic Chapter that the Local Study Area incorporates the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge. The selection of output areas is based upon a 'best fit' match of the urban area surrounding Gatwick, incorporating the main towns of Crawley and Horley and some smaller settlements located near to the Project site boundary such as Charlwood, Copthorne,</p>	<p><b>ES Chapter 17 Socio-Economics</b> [APP-042] paras 17.4.8-13</p> <p><b>ES Socio-Economic Effects Figures</b> [APP-052]</p> <p><b>ES Appendix 17.8.1 Employment, Skills and Business Strategy</b> [APP-198].</p>	Under discussion

			<p>Hookwood, Ifieldwood, Salfords and Smallfield. A map of the Local Study Area is also provided.</p> <p>The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. The assessment is available to view on PINS website.</p> <p>The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.</p>		
<b>2.19.4.4</b>	Employment and Skills Business Strategy	<p>The Employment and Skills Business Strategy (ESBS) is generic, lacking detail and clarity and does not provide sufficient detail on, amongst other things, local baseline; tailored local initiatives aligning with local needs and priorities; outputs; measurable targets, details of funding and approach to monitoring.</p> <p><b>Updated position (Deadline 1):</b> More detailed information is required in the ESBS as set out in the LIR.</p>	<p>Please refer to ES Appendix 17.8.1 Employment, Skills and Business Strategy for details.</p> <p>The plan will include more specific detail on the objectives, initiatives and activities, targets, milestones, implementation processes and partners, including how objectives will be met at the local level. The approach to monitoring and evaluation of actions and impacts will be included. GAL recognises that the skills, employment and business growth and productivity fields are dynamic and fast-moving in terms of national and local policy responses, skill needs and demands and technological changes. The project will be delivered over a period of 15+ years. Thus, the strategy and implementation plan will need to incorporate capacity for the projects and associated targets and outcomes to flex and change in response effectively to changing circumstances as required.</p> <p>The ESBS Implementation Plan will describe how GAL will collaborate with partners to define and implement a clear regional 'identity' and promotion strategy. Initial scoping research, informed by a partner workshop, has just completed and the recommendations will inform the Implementation Plan.</p>	<b>ES Appendix 17.8.1 Employment, Skills and Business Strategy</b> [APP-198].	Under discussion
<b>2.19.4.5</b>	Education Engagement Strategy	GAL's Education Engagement Strategy targets age groups aged 5 – 24 and wider families. GAL should also consider offering new	The ESBS Implementation Plan will be drawn up in partnership with local authorities and including targeting of activity which could include these groups.	n/a	Under discussion

		<p>training courses that recognise the upskilling needs of an adult population. Adults returning to work will need a more tailored offer.</p> <p><b>Updated position (Deadline 1):</b> More detailed information is required in the ESBS as set out in the LIR.</p>			
<b>2.19.4.6</b>	ESBS clarifications	<p>Clarification and further work are required in a number of areas. SCC also requires further engagement around the ESBS and expects to see it supported by a draft implementation plan with named partners and a timeline supporting the delivery of the activities. Local authority input into the principles of the Gatwick Community Fund is also needed.</p> <p><b>Updated position (Deadline 1):</b> More detailed information is required in the ESBS as set out in the LIR</p>	The Implementation Plan will be drawn up in partnership with local authorities and will include targeting of areas and groups.	n/a	Under discussion
<b>Other</b>					
<i>There are no other issues relevant to this topic in this Statement of Common Ground</i>					

2.20. Traffic and Transport

2.20.1 Table 2.1 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
<b>Baseline</b>					
2.20.1.1	Baseline Environment	<p>SCC is concerned that high levels of background traffic on the SRN (M25), which is demonstrated as being at capacity in 2029 in the westbound direction in the morning peak and in the eastbound direction in the evening peak, will increase traffic on the local road network both directly and indirectly as non-airport traffic re-routes off the SRN on to SCC's network.</p> <p><b>Updated position (Deadline 1):</b> Response points to assessment criteria that highlights the point that Table 31 cannot assess impacts on close to / at capacity roads.</p>	Road traffic flow difference plots for the tested scenario combinations are provided in Section 12.4 of Annex B of the Transport Assessment. These provide an estimate of the traffic transferring onto or from different road links as a result of the Project. 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.	<b>Transport Assessment [AS-079]</b>	Under discussion
2.20.1.2	Baseline Environment	<p>SCC is concerned that the baseline includes the 2,500 additional spaces via robotics at the South Terminal long stay parking area even though it is yet to be agreed whether this would count as permitted development as it has not been trialled yet.</p> <p><b>Updated position (Deadline 1):</b> This should not be in the baseline as it is subject to GPDO consultation with Crawley</p>	As explained in Section 4.4 of ES Chapter 4, a GPDO Consultation was submitted for a trial of Robotic Parking in 2019 (Crawley Borough Council reference CR/2018/0935/CON). The trial was delayed due to COVID-19 pandemic. It is proposed to extend robotic parking over a larger area of existing car park to provide the additional 2,500 spaces in three phases - 500 spaces in 2024 and 1000 spaces in each of 2025 and 2026. These further phases will also come forward as permitted development subject to GDPO consultations with Crawley Borough Council.	<b>ES Chapter 4: Existing Site and Operation [APP-029]</b>	Under discussion
2.20.1.3	Modelling suite	<p>The public transport model validation over-estimates public transport demand in Greater London and the South East and does so significantly for the county of Surrey.</p> <p><b>Updated position (Deadline 1):</b> Report referenced shows limited data compared to more detailed modelling reports.</p>	Annex B Strategic Transport Modelling Report of the Transport Assessment, section 5.2.11, describes that at 24hr level the 2-dir modelled passenger volumes are 1% above the counts for the Southern network (ie for GTR services crossing the London cordon at Victoria, Blackfriars and London Bridge). In the individual periods, the 2-dir volumes differ from the counts by +1% (AM), 0% (IP), +4% (PM), -2% (OP1) and +6% (OP3).	<b>Transport Assessment Annex B Strategic Transport Modelling Report [APP-260]</b>	Under discussion
<b>Assessment Methodology</b>					
2.20.2.1	Assessment methodology, assumptions and limitations of the assessment	<p>SCC is concerned that the modelling tools adopted cannot be considered accurate enough to provide confidence in their outputs, whether it is likely that GAL will be able to meet their Surface</p>	The Examining Authority has made a Procedural Decision dated 24 October 2023 to request the Applicant to provide a detailed response to look at accounting for COVID-19 in	<b>Accounting for Covid-19 in Transport Modelling [AS-</b>	Under discussion

		<p>Access Commitments and thus whether the ES has thoroughly assessed all the potential impacts.</p> <p><b>Updated position (Deadline 1):</b> SCC have raised concerns with COVID-19 transport modelling.</p> <p>Note SCC's preference for environmentally led growth.</p>	<p>the transport modelling. This work is being undertaken for submission to the ExA in due course.</p> <p>Our mode share commitments within the Surface Access Commitments document represent the position we are committing to achieve, based on our modelling of mode choice and transport network operation.</p> <p><b>Updated response (Deadline 1):</b> The response to the ExA's Procedural Decision on accounting for Covid-19 in the transport modelling has been submitted and is available on the Project Webpage.</p>	<p><a href="#">121</a> and its <b>Appendices</b> <a href="#">[AS-122]</a></p>	
<b>2.20.2.2</b>	Assessment methodology, assumptions and limitations of the assessment	<p>SCC is concerned that the extent of the VISSIM model includes only one junction in Surrey's network (Longbridge Roundabout), but the extent should be much larger.</p> <p><b>Updated position (Deadline 1):</b> SCC submitted concerns with the VISSIM modelling November but is yet to hear back.</p> <p>In particular, SCC is still concerned about this. The model appears to be skewed towards the Crawley area, yet based on the distribution of airport traffic, the Horley area should feature more heavily (Transport Assessment Diagram 12.3.2: <a href="#">TR020005 APP-258</a>).</p> <p>Also, the A23 Brighton Road / Massetts Road signal junction is around 350m away from Longbridge Roundabout and thus the traffic pattern arriving at Longbridge Roundabout will be different in the model due to the signal operation. Therefore, the current model is not likely to represent the true operational impact on Surrey's road network.</p>	<p>Microsimulation modelling has been carried out for 2032 and 2047 with and without the Project, covering the network in the vicinity of the Airport, as set out in Section 13 of the Transport Assessment. The area covered by the microsimulation model remains as indicated in the Autumn 2021 consultation, as it is considered that the strategic model, which covers a much wider area but includes the local road network in the vicinity of the Airport, provides an appropriate means of assessing local network performance. The effects of the Project in relation to driver delay have been considered, as explained in Section 12.9 of Chapter 12 to the ES and Section 12 of the Transport Assessment. The strategic modelling work, described in Section 12 of the Transport Assessment, considers 2029, 2032 and 2047 with and without the Project and demonstrates the effects on the performance of the wider SRN and the local road network within the modelled area. Impacts have been considered in relation to junction performance and driver delay, using the magnitude of impact criteria set out in Table 12.4.6 of ES Chapter 12: Traffic and Transport.</p>	<p><b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a></p>	Under discussion
<b>2.20.2.3</b>	Modelling suite	<p>SCC is concerned that the modelling tools adopted cannot be considered accurate enough to provide confidence in their outputs, questions whether it is likely that GAL will be able to meet their Surface Access Commitments (SAC) [APP-090] and therefore whether the Environmental Statement (ES) has thoroughly assessed all the potential impacts.</p> <p><b>Updated position (Deadline 1):</b> The information provided is not complete as the validated reports were not submitted into inquiry.</p>	<p>The model performance is outlined in Section 5 of Annex B of the Transport Assessment. This outlines the overall performance of the models covering the highway assignment, public transport assignment and variable demand modelling realism. This is further commented on in the Transport Assessment, Section 12.3.</p>	<p><b>Transport Assessment</b> <a href="#">[AS-079]</a></p>	Under discussion

2.20.2.4	Modelling suite	<p>The highway model has introduced a tiered approach to calibration and validation standards, yet the tolerances applied to calibration/validation have not been applied to impact assessments.</p> <p><b>Updated position (Deadline 1):</b> SCC deem it suitable to tier the impact assessment</p>	<p>The tiered approach adopted to calibrate and validate the highway assignment model on screenline performance was agreed with the local highway authorities and National Highways. The link level criteria was retained as per the guidance in TAG Unit M3.1 - it was considered suitable to not tier the impact assessment.</p>	<p><b>Transport Assessment</b> <a href="#">[AS-079]</a></p>	Under discussion
2.20.2.5	Modelling suite	<p>The lack of interaction between the highway and public transport models may mean that future year bus and coach travel will not reflect delays associated with traffic growth over time and that may result in over-estimated demand for these modes.</p>	<p>There is no direct interaction between the highway and public transport model in terms of bus speeds however bus speeds have been reduced in the future year scenarios based on Road Traffic Forecasts. This process is detailed in section 7.12 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment.</p>	<p><b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a></p>	Under discussion
2.20.2.6	Modelling suite	<p>The realism test results for car fuel costs, which are higher than TAG criteria, and may result in a greater shift away from car than might otherwise be expected.</p> <p><b>Updated position (Deadline 1):</b> Table 26 of TN05 shows that the overall value is -0.35 yet is -0.39 in AoDM.</p>	<p>The realism tests are within TAG criteria for the three tests which are detailed in 5.4 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. Specifically the car fuel cost sits at -0.35 with TAG guidance suggesting between -0.25 and -0.35 as acceptable.</p>	<p><b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a></p>	Under discussion
<b>Assessment</b>					
2.20.3.1	Assessment of Effects	<p>SCC has already outlined concerns about the performance of the models used, the extent of models used and low level of impacts reported. Until these have been addressed, SCC cannot comment on the assessment of effects.</p> <p><b>Updated position (Deadline 1):</b> Much is a repeat issue. Regarding assessment of effects, we note the changes in Autumn 2021 but Table 31 still shows medium impacts when links could potentially shift to 100%.</p>	<p>The model performance is outlined in Section 5 of Annex B of the Transport Assessment. This outlines the overall performance of the models covering the highway assignment, public transport assignment and variable demand modelling realism. This is further commented on in the Transport Assessment Section 12.3. 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. The extent of the models was consulted on with local highway authorities as part of the specification of the model.</p> <p>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. This assessment was discussed with stakeholders and at Topic Working Groups; the criteria used in the magnitude of impact assessment were amended following the Autumn 2021 Consultation following feedback from stakeholders at that time.</p>	<p><b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a></p>	Under discussion

2.20.3.2	Traffic and transport conclusion	<p>A recurring theme of these traffic and transport comments is that of certainty of outcome. The evidence presented is based on assumptions contained within models. There are queries around capacity and demand within the airport forecasts and this leads to SCC concerns as to whether all the proposed highway infrastructure and additional parking spaces are required.</p> <p><b>Updated position (Deadline 1):</b> The issue of certainty of outcome relates to the fact that if mode share is not met – the outcome is unknown.</p> <p>We welcome parking size increase being as and when required, but the trigger must be stipulated.</p>	<p>The assessment indicates that completion of the highway works by three years after dual runway operations commence is appropriate in order to provide sufficient capacity for traffic generated by the Project, based on the air passenger forecasts used in the assessment. GAL has indicated in the Application that the 1,100 additional car parking spaces being sought within the DCO would be brought forward as and when required, in response to demand but also in the context of the mode share commitments.</p>	<p><b>Transport Assessment</b> [AS-079]</p>	<p><b>Under discussion</b></p>
2.20.3.3	Traffic and transport conclusion	<p>SCC has demonstrated that there are elements of the models that have higher degrees of uncertainty than usual (the tiered high validation) and other modelling elements that could have a higher propensity to deliver public transport mode share than may otherwise be the case. Furthermore, SCC is not aware of the levels of parking and access charge that will be required to deliver the mode share levels published, and whilst the values used in the model are presented, these are not benchmarked. It is hard therefore for SCC to be sure that the measures proposed will be sufficient for the SACs to be met and that the assessment of impacts and effects is robust.</p> <p><b>Updated position (Deadline 1):</b> Repeat issue. Given the heavy lifting done by the charges (compared to other modes) it is vital that SCC has confidence that the charges will deliver results as modelled.</p>	<p>The tiered approach adopted to calibrate and validate the highway assignment model on screenline performance was agreed with the local highway authorities and National Highways. The link level criteria was retained as per the guidance in TAG Unit M3.1 - it was considered suitable to not tier the impact assessment.</p> <p>The committed mode shares are informed by the strategic modelling work and the parking and forecourt charges set out in Chapter 7 of the Transport Assessment. Further information is being prepared on the justification for the proposed number of car parking spaces. This will be shared with the local authorities in due course.</p>	<p>Chapter 7 of the <b>Transport Assessment</b> [AS-079]</p>	<p>Under discussion</p>
<b>Mitigation and Compensation</b>					
2.20.4.1	Mitigation and Enhancement Measures Adopted as Part of the Project	<p>SCC is concerned that the following elements of the surface access interventions which form part of the SAC remain unspecified:</p> <ul style="list-style-type: none"> <li>• Financial support for enhanced regional express bus or coach services and local bus services;</li> <li>• Funding to support local authorities in implementing additional parking controls or in enforcement action against unauthorised off-airport passenger parking sites;</li> <li>• Charges for car parking and forecourt access to influence passenger travel choices;</li> <li>• Introducing measures to discourage single occupancy private vehicle use by staff, incentivise active travel use and increase staff public transport discounts;</li> <li>• Use of the Sustainable Transport Fund to support sustainable transport initiatives; and</li> </ul>	<p>The funding of the committed bus and coach interventions will be subject to discussions with operators at the time. GAL is committed to using parking charges to influence air passenger travel choices and to achieve the mode share commitments. GAL needs to be able to retain flexibility to review and amend its parking charges in response to progress against the mode share commitments and to anticipated parking demand at different times of year. Further information is being prepared on the application of these measures in support of the Surface Access Commitments.</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090]</p>	<p>Under discussion</p>



		<p>Provision of a Transport Mitigation Fund to support additional measures should these be needed as a result of growth related to the Airport.</p> <p><b>Updated position (Deadline 1):</b> Awaiting further information.</p>			
2.20.4.2	Mitigation and Enhancement Measures Adopted as Part of the Project	<p>SCC note that a heavy reliance is placed on charges for car parking and forecourt access (see above) and also for rail projects to deliver surface access commitments. However, there are no new rail proposals associated with the project, just 2-3 extra peak hour trains and 10 extra off-peak trains per hour that are planned to happen regardless of the project.</p> <p><b>Updated position (Deadline 1):</b> SCC recognise that normal transport modelling practice is being adopted. However, without these schemes being delivered in full and against pre-Covid-19 timetable levels, uncertainty remains.</p>	Committed rail projects are included in the future baseline and the with Project scenarios where they have a sufficient level of certainty, in line with normal transport modelling practice. The assessment for the Project shows that there is no significant adverse impact on rail 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. In general, the greatest increases in patronage related to the Project will be in the counter-peak direction.	<b>Transport Assessment</b> <a href="#">[AS-079]</a>	Under discussion
2.20.4.3	Mitigation and Enhancement Measures Adopted as Part of the Project	<p>SCC is concerned that the bus and coach services seem to be under-played: they fail to meet the target in the 2014 ASAS for a second runway, and there is no indication of the willingness of operators to provide these services or advise if others may be required</p>	The SACs set out GAL's commitment to deliver bus and coach improvements and these inform the mode share commitments. GAL routinely liaises with public transport operators, whether separately or as part of discussions with the Transport Forum Steering Group and wider Gatwick Transport Forum and will continue to do so prior to and after the delivery of the Project.	<b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a>	Under discussion
2.20.4.4	Mitigation and Enhancement Measures Adopted as Part of the Project	<p>Feedback provided by SCC in February 2023 (GAL NRP DCO_Review of Highways Design Strategy Report_v1) with regard to the highway and active travel infrastructure proposals do not appear to have been satisfactorily actioned, while review of the submitted material associated with the DCO application has identified further queries and concerns.</p> <p>While GAL has now provided further explanation in response to this feedback via their consultants Arup on 5th October 2023, SCC considers that many of the concerns and issues raised are still outstanding.</p> <p><b>Updated position (Deadline 1):</b> SCC considers that this is still outstanding. SCC reviewed the information provided by Arup on 5<sup>th</sup> October and provided comments accordingly.</p>	<p>The Rights of Way and Access plans and corresponding DCO schedules (Schedule 4) will be updated to provide improved clarity on the distinction between different types of footway / shared-use cycle track and segregated cycle track provision included as part of the scheme proposals.</p> <p>In addition to the information shared through technical design engagement (including the Topic Working Group sessions focussed on Active Travel), the DCO application documents include General Arrangement Drawings, Engineering Section Drawings and Structure Section Drawings that provide additional detail on the preliminary scheme proposals. Typical minimum widths of footway provision through the scheme is 2.0m, typical minimum width of shared-use paths provided through the scheme is 3.0m and typical minimum width of segregated cycle tracks is 5.0m (3.0m for two way cyclist use and 2.0m for pedestrians). Separation distances to the carriageway vary in accordance with proposed speed limits and as a result of local site features that influence the design.</p>	<p><b>Rights of Way and Access Plans</b> (Doc Ref. 4.6)</p> <p><b>Surface Access Highways General Arrangements</b> <a href="#">[APP-020]</a></p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a></p>	Under discussion

			<p>Localised reductions in active travel infrastructure width provision are proposed at constraints (e.g. at bridge structures) with due consideration of relevant design guidance (e.g. as set out in LTN 1/20). Detailed design drawings would be developed at the detailed design stage after the DCO has been granted in consultation with the relevant highway authorities.</p> <p>As set out in the responses provided on 5th October, no further mitigation is considered to be required to meet the mode share targets set out in the SAC.</p>		
<b>2.20.4.5</b>	Mitigation and Enhancement Measures Adopted as Part of the Project	<p>The active travel infrastructure proposed is unsatisfactory, especially considering ambitious sustainable mode share targets set.</p> <p><b>Updated position (Deadline 1):</b> SCC considers that this is still outstanding. SCC reviewed the information provided by Arup on 5th October and provided comments accordingly.</p>	<p>The proposed improvements are illustrated in the Surface Access Highways – General Arrangements and Rights of Way and Access Plans. A further summary of the proposals is provided in Section 5.2 of the ES Project Description.</p> <p>No further mitigation is considered to be required to achieve the mode share targets set out in the SACs.</p>	<p><b>Rights of Way and Access Plans</b> (Doc Ref. 4.6)</p> <p><b>Surface Access Highways General Arrangements</b> [<a href="#">APP-020</a>]</p> <p><b>ES Chapter 5: Project Description</b> (Doc Ref. 5.1)</p>	Under discussion
<b>2.20.4.6</b>	Surface Access Commitments	<p>It is a concern to SCC that GAL appear to have proposed a less ambitious sustainable transport mode share target than previous documents aimed for and that efforts to meet them in a business-as-usual scenario seem to have been neglected.</p> <p><b>Updated position (Deadline 1):</b> Business as usual would see a 53% public transport mode share in 2032 (Table 72). A 55% target is not that ambitious on that basis.</p>	<p>For business as usual operations, the targets set out in our Decade of Change strategy and our current ASAS remain in place and we will continue to work to achieve those prior to the opening of the Project.</p> <p>The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which we will be working towards, but we have set the committed mode shares explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport and in the Transport Assessment are delivered. Further clarification is sought as to why the commitments are not considered ambitious.</p> <p>We have carefully considered the approach to growth and surface access commitments. We are confident that the commitments we are making and the way in which they are structured are appropriate in the context of the anticipated rate of growth which is forecast for dual runway operations at the airport.</p>	<p><b>ES Chapter 12 Traffic and Transport</b> [<a href="#">AS-076</a>]</p> <p><b>Transport Assessment</b> [<a href="#">AS-079</a>]</p>	Under discussion

2.20.4.7	Securing mitigation	<p>SCC is concerned that the highway-based mitigation, secured through this DCO, is planned to commence as soon as the airside works have been completed rather than establishing whether they would be required at that time if the SAC were met or exceeded. That the first Annual Monitoring Report (AMR) will be produced no later than six months before the commencement of dual runway operations provides the opportunity for evidenced based growth to occur.</p>	<p>The assessment assumes that the highway works would be commenced once the airside works have been completed, as the modelling indicates that completion of the highway works by three years after dual runway operations commence is appropriate in order to provide sufficient capacity for traffic generated by the Project, based on the air passenger forecasts used in the assessment. Based on VISSIM local modelling work, the need for the highway improvements is set out in Chapter 13 of the Transport Assessment.</p>	<p><b>Transport Assessment</b> [AS-079]</p>	<p>Under discussion</p>
2.20.4.8	Securing mitigation	<p>SCC is concerned that “if the AMR shows that the mode share commitments have not been met or, in GAL's reasonable opinion, suggests they may not be met (having regard to any circumstances beyond GAL's control which may be responsible)”, GAL has the opportunity to prepare an action plan for the next two years to address any shortfall but that there does not appear to be any sanction if the SAC are not met by that time.</p>	<p>The SAC set out the monitoring strategy which is in keeping with the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group, and which could ultimately require approval by the TFSG in the event of successive AMRs demonstrating that the mode share commitments have not been met.</p>	<p><b>ES Appendix 5.4.1 Surface Access Commitments</b> [APP-090]</p>	<p>Under discussion</p>
2.20.4.9	Additional complimentary RoW improvements not fully explored	<p>The scheme has not fully explored how further improvements to the Rights of Way network around the airport could increase opportunities for sustainable travel from surrounding residential areas such as Charlwood, Hookwood and Povey Cross.</p>	<p>The proposed active travel improvements are designed to benefit as large a population as possible by targeting densely populated residential areas where employees reside with improved active travel infrastructure in an effort to maximise the uptake of sustainable travel.</p> <p>Povey Cross and Hookwood will both benefit from the improved Longbridge to South Terminal active travel provision due to their proximity to the Longbridge active travel improvements.</p>	<p><b>Transport Assessment</b> [AS-079]</p>	<p>Under discussion</p>
2.20.4.10	Mitigation and enhancement measures adopted as part of the project	<p>In particular, SCC has previously highlighted concerns with the active travel route being promoted via Longbridge Roundabout as it is not the most direct route and incorporates sections of shared use on bridges that are being widened in any case; users are thus twice compromised. SCC highlighted that these concerns would be lessened if the more direct route between Gatwick and Horley via the new signalised crossing of A23 London Road and Riverside Garden Park was provided for pedestrians and cyclists. SCC has also expressed concern with the decision not to improve links over the Brighton Mainline for cyclists.</p> <p><b>Updated position (Deadline 1):</b> SCC has repeatedly requested that the route through Riverside Park is promoted as the preferred active travel route, along with a new railway crossing for cyclists. However, the requests have not been actioned.</p>	<p>The proposed introduction of a pedestrian crossing provision at the new A23 London Road signal controlled junction at North Terminal seeks to minimise environmental impacts to Riverside Garden Park through the provision of an upgraded footway connection to the existing access into the park, east of the proposed junction.</p> <p>The provision of the new pedestrian crossing at this location takes account of journey time considerations for pedestrians travelling between southern Horley and the airport. The new more direct route for pedestrians is expected to lead to an increased proportion of staff travelling by foot from this area.</p>	<p><b>Transport Assessment</b> [AS-079]</p>	<p>Under discussion</p>

			<p>The design proposals don't preclude potential future provision of a shared-use path connection to / from the park, noting that it may not be considered desirable by all park users/project stakeholders for additional cyclists to travel through the middle of the park between the existing car park and the junction as opposed to on route around the edge of the park such as NCR 21. The proposed cross section of the widened central reserve on A23 London Road at the staggered crossing and the proposed footway link on the western side of North Terminal Link have been future proofed to enable potential future upgrade to shared-use path provision. The footway connection into Riverside Garden Park on the eastern side of A23 London Road would need to be widened to accommodate a section of shared-use path resulting in increased footprint impacts in the park.</p> <p>The route is proposed as pedestrian only as cyclists are anticipated to prefer to travel between Horley and the airport either via the new active travel path connection between Longbridge Roundabout and North Terminal Roundabout on the western side of A23 London Road or via the existing NCR 21 route to South Terminal (including the A23 London Road subway). The section of shared-use path provision on the western side of A23 London Road would be substantially wider than the desirable minimum value of 3.0m with a 5.3m wide provision (including separation distance to the carriageway) proposed. This is not expected to materially impede usage or impact the attractiveness of the route by cyclists.</p> <p>The introduction of a pedestrian only crossing will reduce the number of pedestrians present on NCR21 and the Longbridge to South Terminal cycle track, reducing the potential opportunity for conflict between users.</p> <p>With regards to improved links over the London to Brighton Rail line, as set out in TWG 5 on Active Travel, three potential options were developed for consideration in relation to enhanced east-west crossing provision for pedestrians and cyclists over the rail line. Options 1 (Replacement of the existing rail footbridge) and Option 3 (Additional widening of the Airport Way Rail bridge on its northern side) were on the northern side of Airport Way. Option 2 (Additional widening of the Airport Way Rail</p>		
--	--	--	--	--	--

			<p>bridge on its southern side) was on the southern side of Airport Way. None of the options examined were taken forward into the final preliminary design proposals. The key reasons for the decision can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• Existing crossing provision over the railway provides good connectivity for walkers and cyclists wishing to access the airport. NRP proposals create no additional severance effects to existing routes</li> <li>• Design options considered would have a range of environmental (e.g. vegetation loss, impacts on proposed planting and increased embodied carbon), visual, disruption (road and rail), constructability and cost dis-benefits, considered to be disproportionate to the value brought about by the options considered.</li> <li>• For residents of southeast Horley (east of the rail line), Victoria Road rail bridge provides connectivity for cyclists to NCR 21 and onward connection to airport assets and Gatwick train station across the rail line with journey distances less than 5km. Similarly for residents of eastern and north-eastern Horley north of Victoria Road Rail bridge NCR 21 passes from the eastern side of the rail line to the western side of the rail line via an existing rail subway located approximately 440m north of Victoria Rail bridge providing onward connectivity to/from the airport.</li> <li>• Access to South Terminal Hilton hotel from Balcombe Road for pedestrians is to be via the proposed new pedestrian access route off Balcombe road to be introduced just south of Airport Way and connecting into existing Gatwick footway network.</li> <li>• The train station / terminal access points at South Terminal and the associated elevated Passenger Transport Interchange link bridges provide connectivity over the rail line with cycle storage facilities available either side of the rail line and onward connectivity to/from North Terminal provided via the Inter Terminal shuttle and the proposed upgrade shared use-path connection between North Terminal and South Terminal.</li> </ul>		
2.20.4.11	Mitigation and enhancement measures adopted as part of the project	Based on the DCO proposals, SCC considers that the active travel infrastructure proposed is unsatisfactory, especially considering the ambitious sustainable mode share targets set [it is noted that section 8.6.16 of the Transport Assessment APP-258] states “The model outputs also indicate that around 9% to 10% of staff journeys made to and from locations within 8km of the airport, compared to	The proposed improvements are illustrated in the Surface Access Highways – General Arrangements and Rights of Way and Access Plans. A further summary of the proposals is provided in Section 5.2 of the ES Project Description.	<b>Rights of Way and Access Plans</b> (Doc Ref. 4.6)  <b>Surface Access Highways General Arrangements</b> <a href="#">[APP-020]</a>	Under discussion

		<p>the target of 15% for such journeys. Thus, improvement to the more direct route between Gatwick and Horley via the new signalised crossing of A23 London Road and Riverside Garden Park to provide for pedestrians and cyclists, as well as cycle links over the Brighton mainline, is considered by SCC to be vital if GAL are to achieve their sustainable mode share targets set.</p> <p><b>Updated position (Deadline 1):</b> SCC has repeatedly requested that the route through Riverside Park is promoted as the preferred active travel route, along with a new railway crossing for cyclists. However, the requests have not been actioned.</p>	<p>No further mitigation is considered to be required to achieve the mode share targets set out in the SACs.</p> <p>The proposed introduction of a pedestrian crossing provision at the new A23 London Road signal controlled junction at North Terminal seeks to minimise environmental impacts to Riverside Garden Park through the provision of an upgraded footway connection to the existing access into the park, east of the proposed junction.</p> <p>The provision of the new pedestrian crossing at this location takes account of journey time considerations for pedestrians travelling between southern Horley and the airport. The new more direct route for pedestrians is expected to lead to an increased proportion of staff travelling by foot from this area.</p> <p>The design proposals don't preclude potential future provision of a shared-use path connection to / from the park, noting that it may not be considered desirable by all park users/project stakeholders for additional cyclists to travel through the middle of the park between the existing car park and the junction as opposed to on route around the edge of the park such as NCR 21. The proposed cross section of the widened central reserve on A23 London Road at the staggered crossing and the proposed footway link on the western side of North Terminal Link have been future proofed to enable potential future upgrade to shared-use path provision. The footway connection into Riverside Garden Park on the eastern side of A23 London Road would need to be widened to accommodate a section of shared-use path resulting in increased footprint impacts in the park.</p> <p>The route is proposed as pedestrian only as cyclists are anticipated to prefer to travel between Horley and the airport either via the new active travel path connection between Longbridge Roundabout and North Terminal Roundabout on the western side of A23 London Road or via the existing NCR 21 route to South Terminal (including the A23 London Road subway). The section of shared-use path provision on the western side of A23 London Road would be substantially wider than the desirable minimum value of 3.0m with a 5.3m wide provision (including</p>	<p><b>ES Chapter 5: Project Description</b> (Doc Ref. 5.1)</p>	
--	--	---	--	--	--

			<p>separation distance to the carriageway) proposed. This is not expected to materially impede usage or impact the attractiveness of the route by cyclists.</p> <p>The introduction of a pedestrian only crossing will reduce the number of pedestrians present on NCR21 and the Longbridge to South Terminal cycle track, reducing the potential opportunity for conflict between users.</p> <p>With regards to improved links over the London to Brighton Rail line, as set out in TWG 5 on Active Travel, three potential options were developed for consideration in relation to enhanced east-west crossing provision for pedestrians and cyclists over the rail line. Options 1 (Replacement of the existing rail footbridge) and Option 3 (Additional widening of the Airport Way Rail bridge on its northern side) were on the northern side of Airport Way. Option 2 (Additional widening of the Airport Way Rail bridge on its southern side) was on the southern side of Airport Way. None of the options examined were taken forward into the final preliminary design proposals. The key reasons for the decision can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• Existing crossing provision over the railway provides good connectivity for walkers and cyclists wishing to access the airport. NRP proposals create no additional severance effects to existing routes</li> <li>• Design options considered would have a range of environmental (e.g. vegetation loss, impacts on proposed planting and increased embodied carbon), visual, disruption (road and rail), constructability and cost dis-benefits, considered to be disproportionate to the value brought about by the options considered.</li> <li>• For residents of southeast Horley (east of the rail line), Victoria Road rail bridge provides connectivity for cyclists to NCR 21 and onward connection to airport assets and Gatwick train station across the rail line with journey distances less than 5km. Similarly for residents of eastern and north-eastern Horley north of Victoria Road Rail bridge NCR 21 passes from the eastern side of the rail line to the western side of the rail line via an existing rail subway located approximately 440m north of Victoria Rail bridge providing onward connectivity to/from the airport.</li> <li>• Access to South Terminal Hilton hotel from Balcombe Road for pedestrians is to be via the proposed new</li> </ul>		
--	--	--	--	--	--

				<p>pedestrian access route off Balcombe road to be introduced just south of Airport Way and connecting into existing Gatwick footway network</p> <p>The train station / terminal access points at South Terminal and the associated elevated Passenger Transport Interchange link bridges provide connectivity over the rail line with cycle storage facilities available either side of the rail line and onward connectivity to/from North Terminal provided via the Inter Terminal shuttle and the proposed upgrade shared use-path connection between North Terminal and South Terminal.</p>		
2.20.4.12		Mitigation and enhancement measures adopted as part of the project	<p>SCC requires:</p> <ul style="list-style-type: none"> <li>Plans to be provided or conditioned that are detailed enough to judge design compliance and that cover all the proposed improvements, with acceptance of the design also conditioned accordingly; and</li> <li>GAL to revise the highway and active travel infrastructure proposals to address the issues raised.</li> </ul> <p><b>Updated position (Deadline 1):</b> SCC has repeatedly requested that the route through Riverside Park is promoted as the preferred active travel route, along with a new railway crossing for cyclists. However, the requests have not been actioned.</p>	<p>The Rights of Way and Access plans and corresponding DCO schedules (Schedule 4) will be updated to provide improved clarity on the distinction between different types of footway / shared-use cycle track and segregated cycle track provision included as part of the scheme proposals.</p> <p>In addition to the information shared through technical design engagement (including the Topic Working Group sessions focussed on Active Travel), the DCO application documents include General Arrangement Drawings, Engineering Section Drawings and Structure Section Drawings that provide additional detail on the preliminary scheme proposals. Typical minimum widths of footway provision through the scheme is 2.0m, typical minimum width of shared-use paths provided through the scheme is 3.0m and typical minimum width of segregated cycle tracks is 5.0m (3.0m for two way cyclist use and 2.0m for pedestrians). Separation distances to the carriageway vary in accordance with proposed speed limits and as a result of local site features that influence the design. Localised reductions in active travel infrastructure width provision are proposed at constraints (e.g. at bridge structures) with due consideration of relevant design guidance (e.g. as set out in LTN 1/20). Detailed design drawings would be developed at the detailed design stage after the DCO has been granted in consultation with the relevant highway authorities.</p> <p>As set out in the responses provided on 5th October, no further mitigation is considered to be required to meet the mode share targets set out in the SAC.</p>	<p><b>Rights of Way and Access Plans</b> (Doc Ref. 4.6)</p> <p><b>Surface Access Highways General Arrangements</b> <a href="#">[APP-020]</a></p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a></p>	Under discussion



<p><b>2.20.4.13</b></p>	<p>Surface access commitments</p>	<p>In GAL's Second Decade of Change (2023), it is reported that "By 2030, Gatwick aims to achieve 60% passenger and staff travel to the airport by public transport and zero and ultra-low emissions journey modes." This 60% target applies to both passengers and staff separately, with the following detailed targets:</p> <ul style="list-style-type: none"> <li>52% of passenger journeys by public transport by 2030, with remaining journeys by zero and ultra-low emission modes; and</li> </ul> <p>48% of staff journeys by public transport, shared travel and active travel by 2030; with remaining journeys by zero and ultra-low emission modes.</p> <p>However, data provided in Tables 8.6.2 (landside passenger two-way rail demand and mode share) and 8.6.3 (landside passenger two-way bus/coach demand and mode share) of the Transport Assessment [AS-079] paint a different picture. The data shows that, in 2029, the 24hr future baseline for public transport mode share (comprising rail mode share (42%) and bus/coach mode share (7%)) would be 49%. The 24hr future baseline for public transport mode share with the Project (comprising rail mode share (43%) and bus/coach mode share (8%)) would be 51%. (The council acknowledges that the latter figure would be 52% by 2032). Targets for staff are also missed.</p>	<p>The mode shares reported in Tables 8.6.2 and 8.6.3 of the Transport Assessment are the results from the strategic transport modelling work for a busy summer day, as described in paragraph 8.6.5. The SACs committed mode shares are annualised (paragraph 4.2.1 of the SACs), and as set out in paragraph 8.6.7 of the Transport Assessment, the annual average mode shares are estimated to be higher than the busy summer day. Seasonal variation of the data is described in Section 8.1 of the Transport Assessment.</p>	<p>Chapter 8 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a></p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a></p>	<p>Under discussion</p>
<p><b>2.20.4.14</b></p>	<p>Surface access commitments</p>	<p>SCC would like GAL to propose an alternative set of commitments that follow the principle of environmentally managed growth, such as those being pursued by Luton Airport in their DCO application. These commitments would prevent growth until interim surface access commitments had been met and thus ensure that sustainable travel was at the heart of Gatwick's growth, rather than a target after growth.</p>	<p>We have carefully considered the approach to growth and surface access commitments. We are confident that the commitments we are making and the way in which they are structured are appropriate in the context of the anticipated rate of growth which is forecast for dual runway operations at the airport.</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a></p>	<p>Under discussion</p>
<p><b>2.20.4.15</b></p>	<p>Traffic and transport conclusion</p>	<p>To reduce uncertainty, SCC request that GAL change its approach to growth and, like Luton Airport's proposals, pursue a sustainable growth agenda which is constrained until Surface Access Commitments have been met. As an approach, it delivers the same outcomes as that which is proposed, but delivers them ahead of growth, not retrospectively. It will add incentive to the action plans that would be delivered should the AMR show that the SAC have not been met.</p>	<p>For business as usual operations, the targets set out in our Decade of Change strategy and our current ASAS remain in place and we will continue to work to achieve those prior to the opening of the Project.</p> <p>The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which we will be working towards, but we have set the committed mode shares explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport and in the</p>	<p><b>ES Chapter 12 Traffic and Transport</b> <a href="#">[AS-076]</a></p> <p><b>Transport Assessment</b> <a href="#">[AS-079]</a></p>	<p>Under discussion</p>

			<p>Transport Assessment are delivered. Further clarification is sought as to why the commitments are not considered ambitious.</p> <p>We have carefully considered the approach to growth and surface access commitments. We are confident that the commitments we are making and the way in which they are structured are appropriate in the context of the anticipated rate of growth which is forecast for dual runway operations at the airport.</p>		
<i>Other</i>					
<b>2.20.5.1</b>	Traffic and transport conclusion	SCC has also requested information regarding the plans and schedules of the DCO; receipt of which could reduce other uncertainties.	The responses to issues raised in relation to the draft DCO are contained in Table 2.7 of this SoCG	<b>Draft DCO</b> (Doc Ref. 2.1)	Under discussion

2.21. Waste and Materials

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

**Table 2.21 Statement of Common Ground – Waste and Materials Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Waste and Materials. It may be necessary to add points in light of any DCO change application relating to the CARE facility.</i>					

2.22. Water Environment

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

**Table 2.22 Statement of Common Ground – Water Environment Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
<b>Assessment Methodology</b>					
2.22.2.1	Clarity required around climate change allowances used in relation to the water environment	<p>Only contains details of fluvial climate change allowance. Surrey County Council design guidance recommends using the Upper End rather than Central when determining climate change allowances. Clarity is required about climate change allowances used in relation to the water environment.</p> <p><b>Updated position (Deadline 1):</b> SCC would like to understand GAL’s justification for a 40 year design life for the airfield as opposed to the 100 years for highway works?</p>	<p>An assessment of the effects of the Project on flood risk are reported in the flood risk assessment informed by hydraulic modelling including fluvial, pluvial, airfield and highway drainage flood risk.</p> <p>The modelling has incorporated the predicted impacts of climate change on peak river flows for fluvial flood risk and rainfall intensity for drainage in accordance with current Environment Agency guidance based on UKCP18. Additionally, an Integrated Catchment Model has been developed to consider and assess the interaction between fluvial and pluvial flood risk.</p> <p>Section 3.7 of the FRA sets out the climate change allowances adopted and assessed for the Project.</p>	<b>ES Appendix 11.9.6: Flood Risk Assessment</b> [APP-147]	Under discussion
2.22.2.2	In the Flood Risk Assessment there are only very limited references to sustainable drainage	<p>The non-statutory technical standards for sustainable drainage have not been referenced. These state that discharge should be to pre-development greenfield run-off rates for the 1 in 1 year and 1 in 100 year events.</p> <p>The limited reference to sustainable drainage in the proposals, including a lack of reference to non-statutory technical standards for sustainable drainage or SCC guidance for sustainable drainage.</p> <p><b>Updated position (Deadline 1):</b> SCC is disappointed that there has been no attempt to achieve to betterment.</p>	<p>SCC SuDS Guidance has been considered and referenced through technical engagement with the LLFA (see Design and Access Statement Volume 5 Section 6.11).</p> <p>Discharge is proposed to be limited to greenfield runoff rates in accordance with the SuDS Guidance where practical.</p> <p>Due consideration has been given to sustainable drainage elements at preliminary design stage as set out in the technical note shared with LLFA. Sustainable drainage elements with multifunctional benefits (e.g. amenity) have been proposed within SCC catchment including basin and ditch. The design is to be further developed at detailed design stage in accordance with the Design Principles in Volume 5 of the Design and Access Statement. after DCO has been granted. Requirements 10 and 11 of the draft DCO state that approval will be required from the lead local flood</p>	<p><b>Design and Access Statement Volume 5</b> [APP-257]</p> <p><b>Draft DCO</b> (Doc Ref. 2.1)</p>	Under discussion

			authority and highways authority respectively to the drainage detailed designs before construction may commence.		
<b>Assessment</b>					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
<b>Mitigation and Compensation</b>					
<b>2.22.4.1</b>	Revisions required to Code of Construction Practice Annex 1 Water Management Plan	<p>Revisions required relating to temporary diversion of an ordinary watercourse, discharges to a watercourse and ordinary watercourse consent.</p> <p><b>Updated position (Deadline 1):</b> Revisions required to Code of Construction Practice Annex 1 – Water Management Plan to correctly reference processes relating to ordinary watercourse consent. For example, inconsistency between para 8.1.2 and 8.2.1</p> <p>Revisions also required to schedule 1 and 2 of the dDCO for accuracy purposes. For example foul drainage is not reviewed by the LLFA.</p>	It would be helpful for SCC to clarify what revisions are required.	n/a	Under discussion
<b>Other</b>					
<b>2.22.5.1</b>	Protective Provisions for Lead Local Flood Authority	<p>Protective Provisions for Lead Local Flood Authority in respect of Ordinary Watercourses are not in dDCO.</p> <p><b>Updated position (Deadline 1):</b> Design principles with regards to ordinary watercourse works have not been discussed or agreed with SCC.</p> <p>We understand every eventuality cannot be considered, but some details about culverting (when, where, how), crossing and outfalling into watercourses should included</p> <p>See comment at chapter 2.7 about the need for Protective provisions</p>	<p>Requirements 10 and 11 of the draft DCO state that approval will be required from the lead local flood authority and highways authority respectively to the drainage detailed designs before construction may commence. In addition these requirements state that the designs must be in accordance with the design principles in Appendix 1 of the Design and Access Statement.</p> <p>If SCC has any specific requests please share those with us.</p>	<b>Draft DCO</b> (Doc Ref. 2.1)  <b>Design and Access Statement Volume 5 Appendix A1</b> <a href="#">[APP-257]</a>	Under discussion

### 3 Signatures

3.1.1 The above SoCG is agreed between the following:

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

## Appendix 1: Record of Engagement Undertaken

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

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