



# Gatwick Airport Northern Runway Project

## Relevant Representations Report

**Book 10**

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## Executive Summary

A total of 4,843 RRs were submitted by Interested Parties (**IPs**). Of these:

- a. 20 were submitted by local authorities;
- b. 42 were submitted by parish councils;
- c. 16 were submitted by other statutory consultees; and
- d. 4,735 were submitted by members of the public, landowners, businesses and non-statutory organisations.

Due to the high volume of RRs received, all RRs have been triaged and categorised into one of three categories:

- e. Category 1: Statement of Common Ground parties;
- f. Category 2: Other Individual and Technical Stakeholders; or
- g. Category 3: Themed Responses where similar issues have been raised.

The Applicant has entered into Statements of Common Ground (**SoCGs**) with a number of parties that have submitted a RR. The issues that have been raised within the RRs by those parties have been responded to within the SoCG rather than duplicating the responses within this report. Section 2 sets out the parties with which the Applicant has a SoCG and explains the process being followed for updating and introducing new issues into the SoCGs in light of the RRs received.

Other Individual and Technical Stakeholders refers to defined groups that GAL does not plan to enter into a SoCG with are statutory consultees (e.g. elected representatives, parish councils, non-statutory organisations).

All other RRs have been responded to thematically within this report. Common issues raised by IPs that do not fall into either of the first two categories have been identified and grouped together according to their principal themes. The Applicant has then provided responses to these common issues, including signposting to the relevant sections of the DCO Application.

## 1 Introduction

### 1.1 Overview

- 1.1.1 This report provides thematic responses to the issues raised in the Relevant Representations ('RRs') submitted to the Planning Inspectorate in respect of the Gatwick Northern Runway Project (the Project). This report also sets out the Applicant's responses to the issues raised.
- 1.1.2 A total of 4,843 RRs were submitted by Interested Parties ('IPs'). Of these:
- 20 were submitted by local authorities;
  - 42 were submitted by parish councils;
  - 16 were submitted by other statutory consultees; and
  - 4,735 were submitted by members of the public, landowners, businesses and non-statutory organisations.
- 1.1.3 All of the RRs have been reviewed and considered by the Applicant. Technical specialists who were responsible for producing the documents that form the Applicant's application for development have been involved in responding to the issues raised. In providing these responses, this report provides appropriate cross-referencing to where the issues have been addressed within the DCO Application.
- 1.1.4 Due to the high volume of RRs received, all RRs have been triaged and categorised into one of three categories:
- Category 1: Statement of Common Ground parties;
  - Category 2: Other Individual and Technical Stakeholders; or
  - Category 3: Themed Responses where similar issues have been raised.
- 1.1.5 The Applicant has entered into Statements of Common Ground ('SoCGs') with a number of parties that have submitted a RR. The issues that have been raised within the RRs by those parties have been responded to within the SoCG rather than duplicating the responses within this report. Section 2 sets out the parties with which the Applicant has a SoCG and explains the process for updating and introducing new issues into the SoCGs in light of the RRs received.
- 1.1.6 Other Individual and Technical Stakeholders refers to defined groups that GAL does not intend to enter into a SoCG with or are statutory consultees (e.g. elected representatives, parish councils, non-statutory organisations).

1.1.7 All other RRs have been responded to thematically within this report. Common issues raised by IPs that do not fall into either of the two aforementioned categories have been identified and grouped together according to their overarching themes. The Applicant has then provided responses to these common issues, including signposting to the relevant sections of the DCO Application.

1.1.8 While all RRs have been reviewed and considered, this report does not to provide a direct response to each RR in order to avoid repetition.

## 1.2 [Structure of this document](#)

1.2.1 This report comprises three main sections:

- Section 2: Statement of Common Ground Parties which summarises the parties in which the Applicant has entered into SoCGs.
- Section 2: Individual and Technical Stakeholders where the Applicant has provided bespoke responses to each of the points raised within the RRs by these parties.
- Section 3: Thematic Responses which summarises the issues raised throughout the RRs and the Applicant's response.

## 2 Relevant Representations – Statement of Common Ground Parties

### 2.1 Overview

2.1.1 As set out in Section 1 of this report, RRs were submitted by IPs with whom the Applicant has produced a SoCG. Table 2.1.1 sets out these parties and the corresponding RR reference number assigned by the Planning Inspectorate.

**Table 2.1.1 Statement of Common Ground parties**

SoCG Party	RR Reference Number	SoCG Reference
Crawley Borough Council	RR-0935	10.1.1
East Sussex County Council	RR-1252	10.1.2
Horsham District Council	RR-1742	10.1.3
Kent County Council	RR-2422	10.1.4
Mid Sussex District Council	RR-3043	10.1.5
Mole Valley District Council	RR-3073	10.1.6
Reigate and Banstead Borough Council	RR-3734 & RR-3735	10.1.7
Surrey County Council	RR-4398 & RR-4399	10.1.8
Tandridge District Council	RR-4487	10.1.9
West Sussex County Council	RR-4773	10.1.10
Civil Aviation Authority	RR-0831	10.1.11
Environment Agency	RR-1374	10.1.12
Historic England	RR-1736	10.1.13
National Highways	RR-3222	10.1.14
Natural England	RR-3223	10.1.15
Network Rail	RR-3247	10.1.16
Thames Water	RR-4518	10.1.17

2.1.2 All RRs and PADSS have been reviewed by the Applicant and initial responses provided in the format of an issues tracker. These responses were shared with stakeholders in December 2023 as part of SoCG discussions.

2.1.3 The Applicant prefers to use the SoCGs as the primary means to communicate the status of issues with these Category 1 parties to avoid duplication of documentation. The SoCGs have been updated in light of the RRs and PADSS to either update the existing issues or add new issues that were not previously raised by a stakeholder, alongside other engagement that has occurred.

- 2.1.4 The SoCGs are 'living' documents and will continue to evolve and be updated to reflect the latest position at each point they are submitted as part of the Examination.
- 2.1.5 The Applicant directs the reader to the SoCGs contained as part of **Statement of Commonality and Statements of Common Ground** (Doc Ref. 10.1) for further information on the issues raised and the Applicant's response.

### 3 Relevant Representations – Responses to Selected Individual and Technical Consultees

#### 3.1 Overview

3.1.1 This section sets out alphabetically the other local authorities, parish councils for areas where the proposed development takes place, elected representatives, statutory consultees, statutory undertakers and non-statutory organisations who have submitted RRS, excluding those parties with whom the Applicant is seeking to enter into a SoCG, and the Applicant’s response.

#### 3.2 Abinger Parish Council

3.2.1 Table 3.2.1 below sets out the Applicant’s response to the issues raised within the RR from Abinger Parish Council [[RR-0012](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.2.1 Applicant’s response to the matters raised by Abinger Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration	Already excessive aircraft noise will be greatly increased. A reduction in aircraft noise of 2dBA is at the threshold of human ability to differentiate and is not accepted in mitigation.	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [<a href="#">APP-039</a>].</p> <p>Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Abinger currently has, and will have with the Project in all assessment years,</p>



		<p>noise levels below the day and night Lowest Observable Adverse Effects Levels (LOAELs), below N65 20 in the daytime and below N60 10 at night as can be seen on the online Air Noise Viewer the link to which is provided in ES Chapter 14 paragraph 14.9.80. The Project is expected to increase flight numbers on an average summer day by 19% and on an average summer night by 9%. Although noise modelling results are not available for this area because levels are below the values stated above, noise levels are likely to increase in the noisiest year by Leq 16 hr 0-2dB and Leq 8 hr night-time by 0-1dB as a result of the Project. The reduction in 2dB stated in the representation may be a reference to next generation aircraft being quieter than current aircraft. This has been factored into the noise modelling for future years and, as reported in ES Chapter 14, goes some way to offsetting increased in noise over time.</p>
Air Quality	Existing air pollution from aircraft and road traffic will be greatly increased.	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Project would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport's contribution to local air quality regardless of significance.</p>

<p>Traffic and Transport</p>	<p>The railway line to Gatwick cannot be expanded. Unlike virtually all airports serving capital cities, Gatwick has no connection to the capital’s mass transit system, the London Underground. Gatwick is only served by a single motorway from the north. East and west road access is particularly poor. Due to the restricted rail and limited road access there will be increased traffic on unsuitable minor rural roads.</p>	<p>A comprehensive assessment has been undertaken of rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users.</p> <p>Extensive modelling work has been undertaken to assess the performance of the highway network. Strategic modelling is set out in Chapter 12 and microsimulation VISSIM modelling is set out in Chapter 13 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. Based on the strategic and microsimulation modelling assessments, together with the proposed highway improvement works, the Project is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation additional to the highway works already proposed.</p>
<p>Greenhouse Gases</p>	<p>Gatwick makes much of the green credentials of its infrastructure. Air travel is environmentally damaging. Emissions created by the increased airport capacity will be greatly increased. The alternative fuels suggestion is</p>	<p>The increase in emissions from a range of GHG sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (future baseline, in the absence of the Project) scenario is not disputed. The impact of</p>

	<p>embryonic technology and there are immense technical problems to be overcome with hydrogen. Any alternative fuels must be brought to Gatwick by road further increasing traffic, pollution, and carbon emissions.</p>	<p>these changes has been assessed in line with relevant regulations and guidance as set out in <b>Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]</b>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. 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>
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		<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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.</p> <p>With regards to the transportation of alternative fuels in a future scenario - it cannot be determined if this will indeed be the mechanism whereby supplies of energy for aircraft are brought for refuelling/recharging (an in some scenarios - e.g. electric aircraft - deliveries will be through electricity networks). The existing fuel regime requires transportation of liquid aviation fuel by road, and any increase in this arising from changes in aviation profiles is not expected to be so different in scale from existing patterns as to represent a significant impact.</p>
<p>General</p>	<p>The poll conducted by Gatwick to gauge support claims that 78% of local people favour its proposals. This poll was not representative since it followed presentations in urban areas not overflowed and where significant numbers of airport employees live, EG Brighton</p>	<p>The survey referred to in the response was the most recent commissioned by the Applicant between 18<sup>th</sup> May and 1<sup>st</sup> June 2023. This has been conducted separately from any consultations undertaken as part of the DCO application process.</p>

	<p>and Croydon. Further, Gatwick’s poll question was a selective one and excluding “don’t knows”. “Strongly support” was actually just 13%. An earlier poll that set out options and asked genuinely local people resulted in 66% objecting to expansion at Gatwick.</p>	<p>The survey was conducted via online interviews administered to members of the YouGov Plc UK panel (over 2.5 million individuals) with the total sample size of the survey being 3,180 adults (age 18+) living in Croydon, Surrey, Kent or Sussex. Of those 3,180 respondents, 1,716 respondents expressed an opinion in support or opposition for the Applicant’s plans to bring its standby runway into route use alongside its main runway. The remaining 1,464 respondents did not express an opinion.</p> <p>Of this sample, 78% of respondents indicated they were in favour of the NRP proposals (either ‘strongly support’ or ‘tend to support’, with 22% of respondents in opposition (either ‘strongly oppose’ or ‘tend to oppose’).</p>
<p>Planning and Policy</p>	<p>The government appointed the Airports Commission to decide where additional runway capacity should be. After three years’ study the Commission’s Chairman, Sir Howard Davies, announced the “unanimous and unequivocal” decision that Heathrow was the preferred site, not Gatwick. Sir Howard went on to describe protestations as, “...Gatwick’s propaganda.” Expansion does not comply with the Airports National Policy Statement.</p>	<p>The application of planning policy for the Project is set out in the <b>Planning Statement</b> [APP-245]. Most notably, Section 8.2 of the <b>Planning Statement</b> explains that, whilst the Airport National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it does not in any way exclude Gatwick Airport from the policy encouragement to intensify the use and capacity of other airports. For instance, paragraph 1.42 of the ANPS states that “<i>the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need</i></p>

		<p><i>which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>As such, no conflict arises between the ANPS and the NRP.</p>
Greenhouse Gases	<p>Downstream Emissions. The forthcoming and imminent verdict in the matter of oil extraction at Horse Hill near Gatwick may be relevant, the Supreme Court currently considering whether the environmental impact of a development includes its downstream emissions. In conclusion Abinger Parish Council is strongly opposed to the expansion of Gatwick, as are other adjoining local authorities and county councils.</p>	<p>The case of <i>R (oao Finch on behalf of the Weald Action Group) v Surrey County Council and others</i> regarding the grant of planning permission for commercial extraction of crude oil at Horse Hill was heard by the Supreme Court in June 2023 and judgment is awaited.</p> <p>Both the High Court and Court of Appeal rejected Mrs Finch's claim that Surrey County Council erred in law by not requiring the EIA of downstream emissions of oil extracted. Upholding the High Court's conclusion, the Court of Appeal held that whether downstream emissions needed to be assessed was a question of fact and evaluative judgment for the planning authority, challengeable only on a public law irrationality basis. A majority of the court upheld the Council's approach as lawful.</p> <p>The development challenged in <i>Finch</i> – a facility for the extraction of hydrocarbons - differs significantly from the Northern Runway Project. In any event, and as detailed in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>], the EIA for the Northern Runway Project has taken a conservative approach to assessing GHG emissions to avoid under-estimation of impact. The assessment factors in all emissions from the take-off,</p>

		climb, cruise and descent and landing stages of outward flights.
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### 3.3 Alfold Parish Council

3.3.1 Table 3.3.1 below sets out the Applicant’s response to the issues raised within the RR from Alfold Parish Council [[RR-0103](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.3.1 Applicant’s response to the matters raised by Alfold Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
General	We are an interested party, and are scoping village residents to ascertain what the situation is regarding comments, either positive or negative. we wish to make representations on the runway expansion plans as it affects Alfold and its residents.	Noted.

### 3.4 Aurigny Air Services

3.4.1 Table 3.4.1 below sets out the Applicant’s response to the issues raised within the RR from Aurigny Air Services [[RR-0104](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.4.1 Applicant’s response to the matters raised by Aurigny Air Services**

Topic	Matter raised in the RRs	The Applicant’s response
Capacity and Operations	Due to congestion at Gatwick Airport in having one runway results in the lack of ATC slots	Demand for slots at London Gatwick continues to be oversubscribed. The Northern Runway Project will allow the release of new slot capacity which will facilitate take up by existing and additional carriers and enable airlines to launch new destinations in new markets.

### 3.5 Aviation Environment Federation

3.5.1 Table X below sets out the Applicant’s response to the issues raised within the RR from Aviation Environment Federation [[RR-0407](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.5.1 Applicant’s response to the matters raised by Aviation Environment Federation**

Topic	Matter raised in the RRs	The Applicant’s response
General - Opposition	AEF opposes this application for a Development Consent Order (DCO) on the basis that it is likely to generate a significant increase in greenhouse gas emissions, and other climate impacts, that runs counter to the UK’s net zero obligations.	Noted. The Applicant’s response to the Aviation Environment Federation’s detailed points is set out below.
Greenhouse Gases	There is a high risk that the carbon dioxide (CO2) emissions reductions from aircraft, relied upon by Gatwick Airport Limited (GAL) in its forecasts, will not be achieved. If the airport feels confident that in fact the emissions increases will be aligned with Government’s policies and measures then it should agree to a binding set of annual emissions caps in line - at least - with the Government’s proposed CO2 trajectory for aviation.	<p>It is not necessary to impose requirements or obligations on any DCO consent for the NRP aligning growth with a precise carbon trajectory. Even if it were, it would not be appropriate to apply the Government’s national trajectory for aviation to specific projects. The Government manages aviation emissions as a whole, recognising that different projects will have different trajectories.</p> <p>Such a requirement or obligation would fail normal planning tests, such as those set out in paragraphs 55-57 of the NPPF. In particular, such a requirement would not be “<i>necessary to make the development acceptable in planning terms</i>” for the following principal reasons:</p> <ul style="list-style-type: none"> <li>- the Environmental Statement concludes that the climate change impacts of the NRP project would not be significant;</li> <li>- the Government has made clear its commitment to manage national aviation emissions consistently with its published</li> </ul>



		<p>trajectory and to intervene where necessary to ensure the trajectory is met and it is not necessary or appropriate for that to be replicated in the DCO; and</p> <ul style="list-style-type: none"> <li>- managing aviation emissions requires the application of a wide range of national economic mechanisms which are outside the control of the Applicant.</li> </ul>
<p>Greenhouse Gases</p>	<p>While our focus as an organisation is on policy, we recognise that it is not the role of the Planning Inspectorate to change or to challenge Government policy. Our comments here therefore focus on those areas in which the Planning Authority does have an important role. All statements of Government support for airport expansion are qualified with wording about justification and sustainability to be judged by the relevant planning authority. There is nowhere in Government policy that states that climate considerations should be excluded or given zero weight in the planning process for airport expansion. Instead, the Government establishes a clear test that the expansion of any airport must meet its climate change obligations. We therefore highlight here what we consider to be relevant</p>	<p>It is not the Applicant’s position that climate change considerations should be excluded from the decision-making process or given zero weight in the planning process for airport expansion. In fact, issues relating to climate change are addressed extensively in the submitted application documents.</p> <p>Rather than relying on assertion, however, the application documents rely on assessment and the detailed consideration of planning policy. The significance to be attached to the impacts of the NRP on climate change are assessed in detail in <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> and the weight to be attached to those impacts is addressed in the <b>Planning Statement</b> <a href="#">[APP-245]</a> at Section 8.7.</p> <p>The analysis demonstrates that the emissions arising from the NRP project would not be so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets.</p>

	evidence on the climate impact of this proposal to be taken into account in the planning decision-making process.	
Greenhouse Gases	<p>We further argue that if the scheme is given approval, it must come with enforceable conditions that greenhouse gas emissions will be capped, at least in line with the emissions forecast presented by the Applicant. This proposal would generate a larger increase in both passengers and emissions than any airport expansion proposal since the passing of net zero legislation in the UK, so the issue requires some close attention. The Applicant is wrong to rely on the efficacy of current policy measures to reduce emissions to net zero by 2050.</p>	<p>The fact that AEF states that the NRP would be the largest increase in passengers and emissions since the passing of net zero legislation (in 2008) is testament to the failure of the planning system to bring forward additional aviation capacity despite the clear need and support for it in government policy.</p> <p>In terms of scale, however, the significance of the NRP should not be overstated. It is GAL’s case that the NRP would support an additional 13 mppa at Gatwick.</p> <p>To put this into context, the latest Government forecasts (Jet Zero 2023) is that demand for aviation in the UK will grow by more than 100 mppa by 2040. In its Jet Zero Strategy (JZS), the Government expresses confidence that this growth can be accommodated consistent with its commitment to net zero.</p> <p>GAL does not accept that it is wrong to rely on the efficacy of current policy measures to reduce emissions. AEF’s case amounts to a criticism of and failure to accept government policy, rather than a meaningful objection to the NRP application.</p>
Greenhouse Gases	The emissions forecast from the Applicant has been based	Whilst AEF asserts that the Applicant should not use the Government’s “High

	<p>on the Government’s ‘High Ambition’ trajectory for aviation in the Jet Zero Strategy. This includes modelling assumptions – on alternative fuels and more efficient aircraft – that are significantly more optimistic than earlier forecasts. Anticipated emissions associated with the project are therefore much lower than previously expected: using the Government’s pre-Jet Zero assumptions, the increase in emissions associated with this project would have been in the region of 1MtCO<sub>2</sub> in 2050; the adoption of the Jet Zero assumptions sees this number fall to 0.513MtCO<sub>2</sub> in 2050. This highlights the sensitivity of the forecasts to the assumptions regarding proposed mitigation.</p>	<p>“Ambition” trajectory, it fails to acknowledge that this is the same trajectory used by Government in its Jet Zero Strategy and confirmed in Jet Zero – one year on. It is that trajectory which the Government has committed to monitor and enforce, and it therefore forms an entirely appropriate basis for the Applicant’s forecasts when considering likely significant effects.</p>
<p>Greenhouse Gases</p>	<p>The Applicant claims that “Jet Zero commits the UK Government to implementing measures to fulfil its legal duty on net zero, and to management of emissions from aviation within this.” In fact, however, while the Jet Zero Strategy set out the Government’s targets and aspirations for emissions reduction, many of the measures that would be required to achieve this are uncertain and some are</p>	<p>The Government (and the Applicant) acknowledges that certainty cannot be applied to any specific measure and that the journey to net zero will be marked by changes in technologies, market mechanisms etc. It is for that reason, however, that the JZS explains that the Government has “<i>a clear goal, with multiple solutions</i>”. As the JZS acknowledges:</p> <p><i>“Although we recognise the high level of uncertainty associated with new technologies, we believe the principles and measures set out in this Strategy</i></p>

	<p>beyond the Government’s control. The rate of commercialisation of more efficient aircraft, for example, is not typically a matter for national governments and the Jet Zero Strategy makes no policy proposals on this topic. Similarly, the strategy makes optimistic assumptions about global carbon markets but beyond advocating for global policy change, the UK has no power to ensure that the CORSIA scheme does in fact become more rigorous after it ends in 2035, and the strategy does not propose any backstop policies if the plan to rely on the international carbon market is not successful.</p>	<p><i>will provide the framework required to achieve ambitious in-sector emissions reductions.”</i> (para 1.8).</p> <p>Similarly, <i>JZS – one year on</i> emphasises the importance which the Government attaches to monitoring, particularly because the JZS contains a range of strategic principles and policy measures that adds complexity to evaluating the strategy and, therefore, that the Government must be alert to changes in each of these so that it can respond in order to meet its commitments (page 12).</p>
Greenhouse Gases	<p>While the UK ETS, applicable to domestic and international departures to EEA destinations, offers a more robust scheme that the Government intends to align with net zero, its international route coverage is also subject to CORSIA rules and the Government is still “carefully considering the approach to [this] interaction”.</p>	Noted.
Greenhouse Gases	<p>On uptake of Sustainable Aviation Fuel (SAF), while the Government has begun to develop proposals for a SAF mandate, big questions remain to be addressed about issues</p>	<p>Please refer to the comment above regarding the level of uncertainty around new technologies.</p>

	<p>such as feedstock sourcing, and proposals to develop a UK SAF industry, beginning with the construction of five SAF plants by 2025, already look off track.</p>	
<p>Greenhouse Gases</p>	<p>The Climate Change Committee’s most recent Progress Report characterised the approach of the Jet Zero Strategy as “high risk due to its reliance on nascent technology” (echoing a similar conclusion from Element Energy, in a report commissioned by AEF <a href="http://aef.org.uk/uploads/2022/05/The-Role-of-Aviation-Demand-in-Decarbonisation-Full-Report.pdf">http://aef.org.uk/uploads/2022/05/The-Role-of-Aviation-Demand-in-Decarbonisation-Full-Report.pdf</a> ). The CCC report argues that the expansion of airports permitted by the Government in recent years is “incompatible with the UK’s Net Zero target unless aviation’s carbon-intensity is outperforming the Government’s pathway and can accommodate this additional demand” and that “No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects.” We recognise that the Government has the right to reject the CCC’s advice and</p>	<p>Whilst the AEF recognises that the Government has the right to reject the CCC’s advice, it fails to recognise the nature of the Government’s formal Response to the recent reports of the CCC. In its latest Response (October 2023), the Government advised:</p> <p><i>“The JZS 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 focussing on new fuels and technology, rather than capping demand, with knock on economic and social benefits.</i></p> <p><i>If we find the sector is not meeting the emissions reductions strategy, we will consider what further measures may be needed to ensure that the sector maximises in the – sector reductions to meet the UK’s overall 2050 net zero target.”</i></p>

	<p>has recently published its response. As noted by the Applicant, however, the Secretary of State ultimately has responsibility for ensuring that climate change legislation is adhered to.</p>	
<p>Greenhouse Gases</p>	<p>The application states: "An important element of Jet Zero is that the emissions trajectory for the aviation sector will be monitored on an annual basis whilst the Strategy itself will be reviewed every five years. This acknowledges that decarbonisation will rely on new technologies which require time to develop and test. However, the Strategy explains (for example, on page 10) that the Government will intervene with new measures if the sector is not meeting its emissions trajectory." It would seem to us that if the CCC is correct about the Government's strategy being unrealistic in its reliance on new fuels and technologies coming rapidly to the market, and if its modelling for airport expansion is therefore inappropriate, then the Government will in the near future need to act to rein in emissions by way of demand reduction. This should – at least – be recognised as a risk to the financial case being made for expansion at Gatwick</p>	<p>AEF asserts that Government may need to intervene to limit airport expansion if its JZS strategy is unsuccessful. However, this does not amount to a robust objection to the NRP application proposals because:</p> <ul style="list-style-type: none"> <li>- planning and DCO decisions cannot be made on the basis that Government policy will be unsuccessful.</li> <li>- That is particularly the case for the policies up to date, closely monitored and directly aligned with a binding Government legal commitment.</li> <li>- As recently as October 2023 in its Response to the CCC, the Government confirmed its confidence that good progress was being made with the JZS and "<i>in all modelled scenarios</i>" the country can achieve its net zero targets.</li> </ul> <p>The Government has made it clear that it will intervene if it needs to. That is a matter for government.</p>

	(and at other airports). The downward revision of the level of demand forecasted by the Government from 70% to 50% within the space of a year (between the publication of the Jet Zero Strategy and of Jet Zero: One Year On) illustrates how vulnerable these estimates are to change.	
Greenhouse Gases	The Government’s climate change obligations are not confined to 2050: the Sixth Carbon Budget (2033-37) and the Government’s interim target of a 78% reduction in emissions below 1990 levels by 2035 are also notable milestones. The emissions associated with this project during the 2030s should be examined closely given that GAL forecasts a higher trajectory for emissions in this decade (and for its cumulative emissions generally out to 2050) compared to the Government’s Jet Zero strategy (see Diagram 16.9.3 in TR020005).	<p>The assessment has sought to consider GHG emissions against carbon budgets for the UK where they currently exist.</p> <p>In addition, the assessment also seeks to contextualise in line with IEMA guidance by comparison to appropriate sectoral trajectories to achieve Net Zero at a national scale, and this has been carried out for aviation emissions.</p> <p>However, it should be noted that Diagram 16.9.3 referred to in the representation does not reflect an average across all airports – it represents the total residual emissions from the aviation sector as set out in the Jet Zero Strategy.</p> <p>Jet Zero commits the UK Government to implementing measures to fulfil its legal duty on net zero, and to management of emissions from aviation within this.</p>
Greenhouse Gases	The Applicant should have modelled the non-CO2 impacts of the proposal. There is a longstanding policy gap related to the non-CO2 climate warming impact of flying. The	The approach adopted on non-CO2 impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in Section 16.4.12 onwards within the <b>ES</b>

CCC states in its sixth carbon budget advice (box 8.6) “non-CO2 effects contribute around two-thirds of the total aviation effective radiative forcing – twice as much as historical CO2 emissions from aviation.” The Applicant argues, however, that: “[Given] that there remains no well-established methodology for quantifying non-CO2 emissions impacts, and there is uncertainty on how to identify the magnitude of their impact, this assessment does not attempt to quantify non-GHG and RF effects of emissions at altitude. Providing a comparative set of figures alongside the CO2 emissions would be incompatible with an assessment against national CO2 targets, and as noted above, the generalised approach to providing CO2 equivalent estimates to reflect the combined impact of different GHGs is not transferrable to non-CO2 emissions.” We don’t agree with the decision not to provide an appraisal of the non-CO2 impacts of the proposal. While it is true that uncertainties remain about the correct methodology for quantification of these effects for the purposes of policy, failure to provide any estimate is not an adequate response. While we

**Chapter 16: Greenhouse Gases** [\[APP-041\]](#).



	<p>await policy proposals for tackling aviation’s non-CO2 impacts (the Government, working with the Jet Zero Council, has launched a work programme on this issue), it would improve the transparency of the proposal for an estimate of non-CO2 impacts to be provided, for example using the approach recommended by the Government for company reporting of travel emissions (which is to apply a multiplication factor of 0.7 to the CO2 impact to account for non-CO2) in order for the inspectors to weigh this additional harm in the balance. It should also be noted that the European Commission is consulting on the objectives, scope and first steps for establishing a monitoring, reporting and verification system for non-CO2 effects in aviation as part of the EU Emissions Trading Scheme (ETS), while the UK Government recently consulted on how non-CO2 impacts could potentially be included in the UK ETS in the future.</p>	
<p>Greenhouse Gases</p>	<p>The Applicant should have made a commitment to cap aviation emissions as part of its Climate Action Plan As set out above, our view is that a significant airport expansion</p>	<p>The Applicant has responded to this representation from AEF above. It is for the Government to control aviation emissions rather than seeking to do so through individual DCOs.</p>

	<p>such as the proposal at Gatwick should not be permitted in the absence of much greater certainty about the effectiveness of proposed mitigations for aviation emissions. If, however, the airport has confidence in the Government's plan – as indicated in its Environmental Statement and as reflected in its use of the Jet Zero modelling assumptions – then the Applicant should agree to the imposition by the planning authority of an enforceable annual cap on aviation emissions associated with the airport.</p>	
<p>Greenhouse Gases</p>	<p>The Applicant states. In relation to its Carbon Action Plan or CAP: "Our commitment to play our part in the UK's Jet Zero trajectory is not contingent on the Project being consented, but the CAP uses the legally binding nature of the DCO application to provide an additional level of assurance to stakeholders." However, aircraft emissions are essentially excluded from the Plan. While the airport may argue that these emissions are beyond its direct control, the same could surely be said of aircraft noise, which is nevertheless frequently subject to planning conditions and limits on capacity.</p>	<p>Whilst AEF asserts that the Applicant should take the same approach to carbon emissions as it does to noise, AEF fails to recognise the different approach required by policies of the ANPS.</p> <p>In relation to carbon, the ANPS contains no expectation that the Applicant will commit to mitigation measures in relation to aircraft in flight (ANPS paragraphs 5.78-5.81). At paragraph 5.75, the ANPS recognises that these matters are largely outside the Applicant's control.</p> <p>In relation to matters such as surface access, airport infrastructure and construction, the ANPS does anticipate that mitigation measures would be appropriate, and these are proposed by the Applicant.</p>

		<p>In relation to noise, the ANPS is clear that the Applicant should put forward plans for a “noise envelope” as part of a range of mitigation measures (ANPS para 5.60).</p>
Greenhouse Gases	<p>We note that despite adopting the Jet Zero modelling assumptions, Gatwick anticipates its own emissions trajectory being very different from the national trajectory – increasing from current emissions levels and then flattening out but not falling nearly as steeply as the average across all airports (Diagram 16.9.3 in TR020005). We would suggest that - as a minimum – it should be required by way of conditions that the Applicant’s forecast level of emissions must not be exceeded in any year. A more stringent set of annual caps could also be considered.</p>	<p>It should be noted that Diagram 16.9.3 referred to in the representation does not reflect an average across all airports – it represents the total residual emissions from the aviation sector as set out in the Jet Zero Strategy.</p> <p>Government policy does not anticipate that a carbon budget will be set for each airport. Rather, the Government’s Jet Zero Strategy sets out the Government’s commitment to regulate the aviation sector as a whole so that its carbon trajectory is consistent with the Government’s commitment to Net Zero.</p>
Greenhouse Gases	<p>The Jet Zero Strategy still allows for a high level (nearly 20 Mt) of emissions to be generated by the sector even by 2050, with ‘out of sector’ carbon removals assumed to be in place to balance these emissions. Arguably the curve towards zero should be much steeper. The setting of an emissions condition would help to provide accountability for the claims and assumptions being</p>	<p>The AEF’s representations amount to a disagreement with Government policy and, in particular, with the specific trajectory used by the Government in the JZS strategy to monitor and enforce the reduction in aviation emissions. AEF then seeks to require restrictions on this DCO application in order to support that criticism.</p> <p>These are matters which AEF should take up with Government rather than with this DCO Examination.</p>

	<p>made. While this approach would be new, and would require some additional work to be done in terms of developing the appropriate wording for a planning condition, we see a strong case for introducing one if the scheme should go ahead given the importance of the climate change issue and the current lack of enforceability of hoped-for emissions reductions.</p>	
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### 3.6 Betchworth Parish Council

3.6.1 Table 3.6.1 below sets out the Applicant's response to the issues raised within the RR from Betchworth Parish Council [[RR-0464](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.6.1 Applicant's response to the matters raised by Betchworth Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
Traffic and Transport	<p>Our Parish lies between the airport and the M25 and increased road traffic and congestion, traffic noise and air pollution will be a major problem. A high volume of traffic exits from the M25 and takes a short cut through the rural roads to the north of Gatwick rather than joining the very often congested M23. Pebble Hill Road (B2032) and the Street in Betchworth are unsuitable even for the current volume of Gatwick traffic. These roads were not designed for this volume of traffic and are continually in need of repair. This level of traffic on rural roads brings</p>	<p>Strategic transport modelling has been undertaken as part of the Application, which includes the parish of Betchworth. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work, no significant increases in traffic are expected through Betchworth. Local authorities are responsible for the maintenance of the public highway and therefore the condition of road surfaces.</p>

	<p>noise disturbance particularly at anti-social times, safety concerns, air pollution, carbon emission increase and roadside littering. Nothing material is proposed in the application to fundamentally change the existing poor road and rail connectivity. The effect on local infrastructure and our community of any increase in traffic would be wholly unacceptable.</p>	
<p>Noise and Vibration</p>	<p>Gatwick has not met the ANPS requirement that noise envelopes are “defined in consultation with local communities”, nor CAA guidance that noise envelopes are agreed with stakeholders.</p> <p>Gatwick rejected community stakeholder requests to change the format and timetable for engagement to improve compliance; failed to provide additional data and analysis for effective engagement; and its proposals were not agreed as they excluded almost all stakeholder comments. Gatwick’s draft Noise Envelope Group Output Report fails to reflect community group views on Gatwick’s proposals or its engagement process. Gatwick’s proposals do not:</p> <ul style="list-style-type: none"> <li>• Meet government policy (APF 2013) that “Future</li> </ul>	<p>A summary of consultation undertaken in developing the Noise Envelope is provided in Section 4 of <b>ES Appendix 14.9.7 The Noise Envelope</b> [<a href="#">APP-177</a>]. This includes a summary of consultee comments on GAL’s outline of the Noise Envelope published in the Preliminary Environmental Information Report (PEIR) in September 2021.</p> <p>The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>] explains that a total of 12 two-hour meetings dedicated to the Noise Envelope development were held between 26 May and 11 October 2022 between the airport and local authority, community and industry stakeholders. This appendix also included the bulk of the material presented and discussed in those meetings and exchanged through correspondence in between including:</p>

	<p>growth in aviation should ensure that benefits are shared between the aviation industry and local communities [so] continue to reduce and mitigate noise as airport capacity grows.” Instead, the proposals would permit noise to increase substantially and potentially indefinitely, so benefits of growth accrue almost entirely to Gatwick and its customers.</p> <ul style="list-style-type: none"> <li>• Give communities certainty about future noise levels (APF para.3.29), contain any proposals to limit noise in the winter period, and will actually allow future reviews to increase noise limits.</li> <li>• Incentivise airlines to introduce the quietest suitable aircraft as quickly as is reasonable. Gatwick should be required to engage properly with community groups and councils, under agreed independent chairmanship, to develop new proposals that comply with policy and guidance.</li> </ul>	<ul style="list-style-type: none"> <li>• Appendix 1 - Noise Envelope Engagement Process Terms of Reference P8-11</li> <li>• Appendix 2 - Gatwick Airport Noise Envelope Group Meetings Dates and Attendees P12-15</li> <li>• Appendix 3 – Meeting Notes P16-91</li> <li>• Appendix 4 - Themed Presentations and papers P92-231</li> <li>• Appendix 5 – Stakeholder presentations and papers P232-296</li> <li>• Appendix 6– Stakeholder Feedback Correspondence and GAL Responses P297-378</li> </ul> <p>Sharing the benefits was discussed in various Noise Envelope Group (NEG) meetings. GAL presented its estimates of sharing the benefits to the NEG on 23 June 2022, see <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>] p164 to 175, using the methodology referred to in the Bristol Airport Planning Appeal Decision, Appeal Ref: APP/D0121/W/20/3259234, 2 February 2022. GAL noted that the policy gives no method for assessing the degree of sharing nor the extent that should be shared, and the planning inspector for the Bristol case approved the scheme as consistent with noise policy, whilst noting that 77% of this potential noise benefit was to be taken by ATM growth.</p> <p>An annual cap of 380,000 commercial Air Transport Movements is included in the DCO that covers the winter as well</p>
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		<p>as the summer when noise impacts are at their greatest.</p>
<p>Noise and Vibration</p>	<p>The proposal would create an unacceptable increase in noise over a very wide area around LGW outside of the area covered by the Noise Envelope, much of which is rural and contains large Areas of Outstanding Natural Beauty. The proposal makes no plans to mitigate this huge environmental impact on a very large population. Departure Routes 3 and 4, one of which is always in use, affect the residents of Betchworth who therefore have no respite at all from aircraft noise. Route 4 is Gatwick’s busiest departure route. An increasing number of Heathrow flights also route over Betchworth. A 35% increase in Gatwick aircraft numbers would be devastating for the residents of this rural area. The ANPS states that the Government expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented and that the rules around its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders.</p>	<p>The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to minimise noise impacts. See <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">AS-039</a>].</p> <p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">AS-039</a>]. The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>]. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive, dominant qualities.</p>

<p>Noise and Vibration</p>	<p>In addition, outside the hours of a ban, it states that the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night. The government has been clear that the ANPS is an important and relevant consideration in respect of applications for any airport nationally significant infrastructure project in the South East of England, not just Heathrow, and that its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications. Gatwick has not proposed a ban on night flights or offered any other limitation on night flights. It has also not explained what particular efforts it would make to incentivise the use of the quietest aircraft at night outside the hours of a ban.</p>	<p>The assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p>
<p>Need and Forecasting</p>	<p>In our view there is no need for additional capacity at Gatwick, which serves a predominately leisure market. The current airport capacity more than satisfies current demand. This expansion will encourage airlines to stimulate greater demand through pricing and to attract additional customers away from the UK regional</p>	<p>Gatwick Airport Limited has drawn together a <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6) which the Parish Council may find it helpful to refer to.</p> <p>The Topic Paper has been prepared in response to requests from the host authorities through the Statement of Common Ground discussions and it draws together the principal issues</p>



	<p>airports. London Heathrow will have more than enough capacity to satisfy any increase in the business travel and cargo markets. This application is all about increasing the size of the GAL business and not at all about satisfying a realistic market demand. Gatwick has not put forward a credible needs case for the proposed development. Its traffic forecasts do not in our view constitute a reasonable basis for assessing the need for additional capacity and its overall case does not comply with the Airports National Policy Statement (ANPS) which requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which would be met by the provision of a Northwest Runway at Heathrow.</p>	<p>relating to need and forecasts, including those covered by the Parish Council in its representations.</p> <p>The Applicant’s need case is also set out extensively in the <b>Planning Statement</b> [APP-245] and in the submitted <b>Needs Case</b> [APP-250]. Those documents address the issues and concerns raised by the Parish Council which, with respect, do not engage with the application material or raise new issues.</p> <p>In particular, it is demonstrably not the case that the existing capacity at Gatwick meets the demand. Gatwick has been over-subscribed for a number of years and the evidence from the independent slot regulators (ACL) demonstrates an excess of demand throughout the peak periods and peak season. Gatwick has to turn away demand to the dis-benefit of the economy and passengers. The unsatisfied demand creates fare price pressure and limits competition.</p> <p>The Parish Council is right that the ANPS requires applications for airport expansion to make their case for expansion. It is important to recognise, however, that the ANPS (at paragraph 1.42) recognises that airports may well be able to make that case due to the known shortage of airport capacity in the South East. In recognition, government policy directly encourages “better use” of existing airport infrastructure and the Government’s own forecasts of aviation capacity that</p>
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		can be achieved by making better use includes the Northern Runway Project at Gatwick.
Greenhouse Gases	Expansion of Gatwick would have very substantial climate change impacts. Gatwick’s proposals would increase the airport’s CO2 emissions by almost 50%. If it were permitted to expand as proposed, Gatwick alone would be responsible for over 3 - 5% of the UK’s sixth carbon budget, with or without Jet Zero mitigations. Approval would require government to ignore the Climate Change Committee’s 2023 Progress Review recommendation to not permit any airport expansion without a UK-wide capacity-management framework being in place. An increase in emissions of this (or any) magnitude would be inconsistent with Government policy and would clearly have a material impact on the UK’s ability to meet its carbon reduction targets. It would be wholly unacceptable to allow CO2 increases and other climate and community impacts on this scale to facilitate any increase in air travel but most particularly to facilitate an increase in the leisure travel market that Gatwick primarily serves, predominantly for the benefit of	<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK’s legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</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. 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</i></p>

	<p>a minority of the population. The Committee on Climate Change has advised that there is no need for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impacts. The application addresses only the emissions caused by operations within the airport. It totally ignores the vast increase in emissions which will be caused by the additional aircraft utilising the airport.</p>	<p><i>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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.</p> <p>The final comment relating to the exclusion of emissions arising from additional aircraft using the airport is incorrect. This is detailed within Table 16.4.1 of the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> and also in Section 5 of <b>ES Appendix 16.9.4: Assessment of Aviation Greenhouse Gas Emissions</b> <a href="#">[APP-194]</a> which provides the results of this quantification process.</p>
<p>Water Environment &amp; Climate Change</p>	<p>Over the years, the River Mole has caused flooding in Betchworth, and many other towns and villages further downstream, on many occasions, especially when Gatwick discharges water in extreme events. Climate change is making these extreme events more frequent</p>	<p>GAL (the Applicant) and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the Northern Runway Project (NRP). The model extends approximately 1.5km downstream of the NRP boundary which is considered sufficient to fully assess</p>

and severe. This application deals with flood risk on the airport and immediate vicinity in great detail but does not do so for the effects downstream. A full review of the effects on the full length of the River Mole should be required and mitigations put in place.

any potential downstream effects. The Environment Agency reviewed and accepted the updated baseline model that has informed **ES Appendix 11.9.6: Flood Risk Assessment** [[AS-078](#)] in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.

Climate change will exacerbate both types of flooding relevant to Gatwick Airport (river/fluvial, surface water/pluvial), irrespective of the Project. The average number of days of heavy rain (the Met Office definition when precipitation is greater than 25 mm per day) is increasing for both the construction period for the 2030s (2020-2049) and the 2060s (2050-2079) (see Tables 15.5.5 and 15.5.6 in **ES Chapter 15: Climate Change** [[APP-040](#)]).

The Project is not expected to increase future flood risk given the **ES Appendix 11.9.6: Flood Risk Assessment** [[APP-147](#)] which takes into account relevant climate change allowances as agreed with the Environment Agency, and the embedded mitigation (as set out in Table 11.8.1 of **ES Chapter 11: Water Environment** [[APP-036](#)], Tables 15.8.4 and 15.9.1 of **ES Chapter 15: Climate Change** [[APP-040](#)] and also summarised specifically for Climate Change in **ES Appendix 5.2.3: Mitigation Route Map** [[APP-078](#)]). The Project is not expected to increase future flood risk given the **ES Appendix**

		<p><b>11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>] which takes into account relevant climate change allowances as agreed with the Environment Agency, and the embedded mitigation (as set out in Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>], Tables 15.8.4 and 15.9.1 of <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and also summarised specifically for Climate Change in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [<a href="#">APP-078</a>]).</p> <p>The multiple potential risks from river and surface water flooding, collectively with the Project, are deemed not significant. The multiple potential risks from river and surface water flooding, collectively with the Project, are deemed not significant.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>].</p>
Climate Change	Gatwick should also not be allowed to understate the climate impact on flooding by selecting a short (40-year)	<b>Consideration of Climate Change and Design Life</b>

	<p>runway design life. The full flood risk must be modelled, and mitigated. The impact of empirical data on how climate change is already increasing the frequency and severity of flooding must be fully assessed.</p>	<p>The adopted lifetime for the airfield works is 40 years (up to 2069), therefore the airfield surface water drainage design has been based on the Central allowance of + 25% for the 2070s epoch (2061 to 2125) the 1 per cent (1 in 100) Annual Exceedance Probability (AEP) event for rainfall intensity in accordance with the same Environment Agency guidance, as stated in Paragraph 3.7.15 of <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[AS-078]</a>.</p> <p>It is considered that a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. Assessment of climate change allowances over a longer design life is therefore considered disproportionate as the aviation industry has changed considerably during the past 40 years and this rate of change is anticipated to continue, see section 3.7.6 of <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[AS-078]</a>.</p> <p>The assessment of flood risk impacts incorporates the predicted impact of climate change over the lifetime of NRP in compliance with national planning policy, see Section 3.7 of <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[AS-078]</a>.</p>
<p>Socio-Economics and Economics</p>	<p>Gatwick’s assessment of the economic benefits and costs of the proposed project is based on unsupportable or out-of-date assumptions, together</p>	<p>The assessment of national impacts (Section 8 of the <b>Needs Case</b> <a href="#">[APP-250]</a>) follows DfT’s TAG (at the time of submission) and assesses costs and benefits from the scheme where</p>

	<p>with omissions and errors. Correction of these assumptions, omissions and errors would have a very significant effect on the overall benefit-cost of the proposed scheme. It is likely that the scheme in fact has a negative net present value and therefore represents a highly unattractive proposition from a public interest perspective. The leisure travel market does not make a positive contribution to the UK economy. The outbound market, adding income to overseas economies outweighs the inbound market by a very substantial margin.</p>	<p>possible given the available data and information at the time of submission. All assessments draw on data for 2019 because that is a robust baseline year since it is the last one not to be affected by Covid-19.</p> <p>While this type of assessment is not required for private-sector schemes, GAL has used 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 (“NPV”) calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>The impact of tourism is set out in Section 6.8 of APP-251 National Economic Impact Assessment. This makes clear that there are significant tourism benefits. There is also strong policy support for outbound leisure travel because of its welfare benefits, even if these cannot be monetised within the TAG framework. This is set out in the Aviation Policy Framework at paragraphs 1.15 - 1.19 and on p.60 of Flightpath to the Future.</p>
<p>Socio-Economics and Economics</p>	<p>Gatwick’s presentation of the asserted employment benefits of the proposed development is misleading: the project is not expected to result in material net job creation at the national</p>	<p>Employment estimates at the local and sub-regional level include an assessment of net impacts (ie after displacement) and are estimated on the basis of an elasticity relationship derived between air traffic and local</p>

	<p>level. Any local or regional job creation would be by displacement from other regions and therefore likely to be inconsistent with the government’s levelling up agenda. Over the past 20 years as Gatwick passenger numbers have grown airport employment numbers have actually decreased.</p>	<p>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 estimate of total net effect (direct, indirect, induced and catalytic) i.e. taking account of additionality is set out in Table 6.1, <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> [<a href="#">APP-200</a>]. Para 6.3.5 refers to estimating net Direct, Indirect and Induced (DII) only.</p> <p>Gatwick relies on workers from a range of districts around the airport, some of which have significant areas of deprivation, including some which are priorities for Levelling Up and have received Levelling Up funds. The Districts have economic and employment growth targets. There is no inconsistency with the Government’s Levelling Up agenda.</p>
<p>Planning and Policy</p>	<p>If the expansion is allowed conditions such as listed below should be put in place.</p> <ul style="list-style-type: none"> <li>• Ban on night flights.</li> <li>• Incentivising airlines to use the quietest aircraft.</li> <li>• Payments to local councils for roads and other infrastructure costs occasioned by the airport expansion.</li> <li>• Releasing the land outside of the current airport boundary currently held to build a second main runway.</li> </ul>	<p>Each point is taken in turn below:</p> <ul style="list-style-type: none"> <li>• <b><u>Night flights</u></b> – Requirement 19(3) in Schedule 2 to the <b>Draft Development Consent Order</b> [<a href="#">AS-127</a>] provides that the repositioned northern runway must not be routinely used between the hours of 23:00 – 06:00.</li> <li>• <b><u>Controlling aircraft noise</u></b> – a Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and</li> </ul>



	<ul style="list-style-type: none"> <li>• No further expansion of the airport boundary.</li> <li>• No landings to be allowed routinely on the northern runway.</li> <li>• Dispersal of flight paths.</li> </ul>	<p>procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>.</p> <ul style="list-style-type: none"> <li>• <b>Funding</b> – GAL will be responsible for funding required supporting infrastructure, such as the surface access works <a href="#">[APP-020 to APP-022]</a> forming part of the Project, the <b>Surface Access Commitments</b> contained in <b>ES Appendix 5.4.1</b> <a href="#">[APP-090]</a> and secured by Requirement 20 of the <b>Draft DCO</b> <a href="#">[AS-127]</a> and the provision of a Sustainable Transport Fund which is to be secured through the draft Section 106 Agreement (to be submitted at Deadline 2).</li> <li>• <b>Safeguarded Land and Airport Boundary expansion</b> – the application relates to the NRP. As set out in the <b>Planning Statement</b> <a href="#">[APP-245]</a>, any decisions in respect of an additional runway to the south of the airport, would be a matter for government policy. As such, it is not a matter pertinent to the NRP or the determination of this DCO Application.</li> <li>• <b>Routine use of the Northern Runway</b> – the premise of the Project proposes to bring the existing northern runway into routine use.</li> <li>• <b>Flight paths</b> – are controlled by the CAA and are not a matter for this DCO application.</li> </ul>
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### 3.7 Boeing

3.7.1 Table 3.7.1 below sets out the Applicant's response to the issues raised within the RR from Boeing [[RR-0486](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.7.1 Applicant's response to the matters raised by Boeing**

Topic	Matter raised in the RRs	The Applicant's response
General - Support	Boeing has a long-standing relationship with Gatwick Airport and is supportive of the proposals for the Northern Runway, which will generate a significant increase in passenger numbers (predicted to increase to 80.2 million from 67.2 million) and associated increase in air traffic movements of 7% in the summer months and 22% in the winter months.	Noted. The Applicant welcomes Boeing's support for the Project.
Construction & Design	Boeing has an aircraft hangar in the northwest section of the Gatwick Airport site. This hangar is used for aircraft repair and maintenance. The Boeing hangar is to be retained as part of the development proposals, although it is noted that the hangar is within the development area identified by the draft DCO (within the Airfield Zone as identified in the submitted Design and Access Statement). The works plans submitted with the draft DCO confirm that no works are planned for the Boeing hangar and that it is to be retained in situ. The works plans show that the existing internal	<p>The location of the existing Boeing Hanger, to be retained as part of the Project, is shown in <b>ES Existing Site and Operation Figures</b> [<a href="#">APP-055</a>] and the <b>ES Project Description Figures</b> [<a href="#">AS-135</a>]. The location of the construction compounds and works to internal access roads are also shown in the <b>ES Project Description Figures</b> [<a href="#">AS-135</a>] and described in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>].</p> <p>Within <b>ES Appendix 5.3.2: Code of Construction Practice (CoCP)</b> [<a href="#">APP-082</a>] GAL has identified various control and management documents which will be applicable to all construction works, including the operation of compounds which are required to be in place prior to commencing works. The CoCP is to be secured under Requirement 7 of the</p>

	<p>access roads to the west of the Boeing hangar will be widened to accommodate a site compound (Airfield Satellite Compound). It is understood that this compound (directly to the south of the Hangar) will be in situ for c10 years before being restored to a landscaped area. Whilst Boeing has no objection to the use of this area as a satellite compound, it would be useful to have some reassurance that the construction and management of the compound would be controlled by suitable planning requirements attached to any DCO (for example – a Construction Traffic Environment Management Plan).</p>	<p><b>Draft Development Consent Order [AS-127].</b></p> <p>Section 5.7 of the CoCP covers details on traffic and transport measures during construction of the Project and is further supported by <b>Annex 3 Outline Construction Traffic Management Plan [APP-085]</b>. Under Requirement 12 of the <b>Draft Development Consent Order [AS-127]</b>, no part of the development may commence until a detailed Construction Traffic Management Plan has been submitted and approved by the relevant planning authority and which is substantially in accordance with the outline document.</p>
<p>Capacity and Operations</p>	<p>It is understood that the proposals will also involve the intensification of use of the taxiways to the east of the Boeing hangar and the provision of new stands and holding areas to the northeast of the Boeing hangar. Boeing considers the intensification of this area to be beneficial to the wider airport and by association their activities. However, it would be useful to have clarification on the likely increase of air traffic movements on the taxiways as this may have an impact on Boeing’s day to day business activities. Boeing has</p>	<p>As set out in the <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7), the modelling of the concept of operation indicates an intensification of use of the taxiways but the area is not expected to be busy. Detailed design work and further development of the concept of operation will follow post grant of the DCO which will allow further detail to be provided.</p>

	welcomed the opportunity to be involved in this process.	
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### 3.8 Brightling Parish Council

3.8.1 Table 3.8.1 below sets out the Applicant’s response to the issues raised within the RR from Brightling Parish Council [[RR-0523](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.8.1 Applicant’s response to the matters raised by Brightling Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
General - Opposition	Brightling Parish Council (BPC) opposes the expansion of Gatwick Airport, and opposes the moving of the second runway.	Noted.
Noise and Vibration	BPC already receives regular complaints about aircraft noise, and we believe that the proposed expansion would worsen this problem.	The impact of aircraft noise from the Project has been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [ <a href="#">APP-039</a> ]. Significant noise effects are not predicted in Brightling Parish.
Greenhouse Gases	BPC believes that the proposed expansion of Gatwick would worsen CO2 emissions and other climate problems, not only from flights themselves, but also from associated road traffic	The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed.  The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16 Greenhouse Gases</b> [ <a href="#">APP-041</a> ]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In

		line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.
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### 3.9 Brighton and Hove City Council

3.9.1 Table 3.9.1 below sets out the Applicant's response to the issues raised within the RR from Brighton and Hove City Council [[RR-0524](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.9.1 Applicant's response to the matters raised by Brighton and Hove City Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
General - Opposition	BHCC raises an objection to the proposal on the basis of the issues set out below.	Noted.
Greenhouse Gases	We note the national commitment to net zero carbon by 2050, including net zero aviation, as set out in the Jet Zero Strategy (DfT 2022). In addition, BHCC has made a local commitment to becoming carbon neutral by 2030. As such, we have concerns that the proposed intensification of the use of Gatwick Airport will compromise these targets and contribute to climate change as it will result in increased flights. These are a key contributor to climate change, and we note the criticisms levelled at the Jet Zero Strategy on the basis that it relies on future	<p>It is noted that various local authorities have their own commitments and reductions trajectories. However the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in Paragraph 16.10.4 of <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>] that references the IEMA Guidance noting that <i>"The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that</i></p>

	<p>technology, rather than a reduction in the number of flights.</p>	<p><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>
<p>Cumulative Impacts and Interrelationships</p>	<p>We note in particular that the cumulative impact of the proposed increased air traffic movements (ATMs) at Gatwick alongside those proposed at other UK airports has not been considered.</p>	<p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a comprehensive cumulative assessment of aviation emissions.</p>
<p>Greenhouse Gases</p>	<p>We note also the mitigation set out in the Greenhouse Gases chapter of the Environmental Statement, much of which relies on the Carbon Action Plan in which the measures are vague. Even for the direct measures targeting aviation, these are identified as ‘potential’ measures, the timescales are not quantified and therefore not enforceable (‘medium’ and ‘long’ term), and there are ‘potential’ deliverables. We appreciate that some measures will be outside the control of the airport as they are the responsibility of airlines, but the intensification of the use will result directly in impacts on climate change.</p>	<p>The CAP focusses on three key airport emission sources: airport buildings and ground operations, aviation and construction. Under each heading the CAP sets clear outcomes that GAL is committing to deliver. To achieve those outcomes, we will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve. These measures are deliberately not prescriptive to ensure GAL retains appropriate and necessary flexibility to identify and implement those measures which are determined to be most effective. This flexibility is particularly necessary in view of the fast-evolving technological background which will inevitably introduce new potential measures that will be utilised to deliver on the commitments in the CAP. However, whilst there is discretion as to the</p>

		<p>individual measures to be used, the overarching commitments to which they relate are fixed and committed to under the CAP, which is secured through requirement 21 of Schedule 2 to the draft DCO. This provides certainty as to the outcomes which GAL must deliver, regardless of how it chooses to achieve them.</p>
<p>Traffic and Transport &amp; Climate Change</p>	<p>The impact of the scheme on climate change in terms of journeys to/from the airport by passengers and staff is also of concern and we do not consider the sustainable transportation targets go far enough.</p>	<p>The mode share commitments set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> present the position GAL is committing to achieve. These commitments draw on the modelling of mode choice and transport network operation. <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> also includes a section on GAL's further aspirations, which includes more ambitious mode share targets which GAL will be working towards. For the DCO Application, GAL has set the committed mode shares and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a> and in the <b>Transport Assessment</b> <a href="#">[AS-079]</a> are delivered.</p> <p>The increase in emissions from a range of sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the future baseline scenario (in the absence of</p>

		<p>the Proposed Development) is not disputed.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The assessment specifically includes the emissions arising from a range of emissions sources as set out in Table 16.4.1 of <b>ES Chapter 16 Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>Traffic and Transport</p>	<p>We consider sufficient investment in adequate, additional measures to make sustainable forms of transport more attractive is essential if the airport's relatively modest objective of increasing the proportion of passengers using sustainable forms of transport from 48% in 2020 to 55% by 2030 is to be met. However, it is recommended that the airport's sustainable transport targets for</p>	<p>As set out above, there are further aspirational mode shares set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a>. The committed mode shares present the position GAL is committing to achieve and inform the assessments in the Application. GAL is also proposing to provide funding through the surface access commitments secured by the DCO to support the introduction of additional regional or express bus and coach services to support the mode share commitments it is making.</p>



	<p>passengers and staff should be more ambitious, especially for passengers, and supported by corresponding levels of investment This should include services and infrastructure, and alongside rail infrastructure should include improved bus and coach connections to enable longer distance inter-urban journeys through ongoing liaison with public transport officers. For this reason, we do not consider the mitigation measures proposed to be sufficient to make the impact of the scheme on the environment acceptable. We object to the proposal on this basis.</p>	
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### 3.10 Brighton and Hove Economic Partnership

3.10.1 Table 3.10.1 below sets out the Applicant’s response to the issues raised within the RR from Brighton and Hove Economic Partnership [\[RR-0525\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.10.1 Applicant’s response to the matters raised by Brighton and Hove Economic Partnership**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Socio-Economics and Economics	The Brighton & Hove Economic Partnership is primarily interested in the economic impact of the scheme and value added in terms of jobs and tourism. Current figures suggest that the expansion activity at London Gatwick would create up to 14,000 additional jobs by 2032 resulting in an	Noted.

	<p>annual contribution to the regional economy of £1bn in GVA. Initial analysis also suggest an additional 1.6m international arrivals per year by 2038. This increased number of inbound tourisms could contribute an additional £1.9bn by 2028. We are also aware of projections which place trade volume at 27% higher, with additional imports facilitating over £2.08bn of additional GVA by 2038.</p>	
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### 3.11 Britannia Hotels Group

3.11.1 Table 3.11.1 below sets out the Applicant’s response to the issues raised within the RR from Britannia Hotels Group [\[RR-0529\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.11.1 Applicant’s response to the matters raised by Britannia Hotels Group**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Compulsory Acquisition and Compensation	<p>Britannia Hotel Group are willing to negotiate a fee for the land edged blue on the plan, however if not reasonable fee can be agreed we will seek to object this proposal.</p>	<p>The Applicant’s agent has been attempting to discuss and negotiate a consideration for a voluntary agreement. The first proposed figure was declined by Britannia Hotels and no further meetings, or a counteroffer has been received by the Applicant. The Applicant’s agents will continue to attempt to negotiate and would encourage Britannia Hotels to submit a counter proposal.</p>
Compulsory Acquisition and Compensation	<p>Furthermore, we object to the remainder of the proposals for the following reasons:</p> <ul style="list-style-type: none"> <li>The land indicated in Pink on the site plan is requested as permanent Land to</li> </ul>	<p>The Applicant is aware and accepts that Britannia Hotels is not inclined to agree to a voluntary land purchase. For this reason, the Applicant has included this land within the permanent acquisition boundary and will be seeking compulsory purchase powers</p>

	<p>Take, and Britannia Hotels Group is generally not inclined to consent this kind of agreement to take place. In any event during our meeting a formal request for a proposed purchased price was advanced; but we haven't received any reply so far.</p> <ul style="list-style-type: none"> <li>• It doesn't appear clear, from the drawings provided, the reason why that strip of land is required, and we are concerned that any eventual future activity can have a negative impact on the signage indicating the hotel and in general have a negative impact on the hotel itself.</li> </ul> <p>For the above reason we strongly object on the proposal.</p>	<p>if the Order is granted. A purchase price has now been sent to Britannia Hotel's representative and the Applicant is awaiting a counter proposal.</p> <p>The Applicant would like to take this opportunity to direct Britannia Hotels to the <b>Design and Access Statement</b> [<a href="#">APP-253</a>, <a href="#">254</a>, <a href="#">255</a>, <a href="#">256</a> and <a href="#">257</a>], <b>Works Plans</b> [<a href="#">AS-017</a>] and <b>Statement of Reasons</b> [<a href="#">AS-008</a>] to show the justification for the land being acquired. Concerns over the hotel signage can be discussed with the Applicant's Land and Design teams.</p>
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### 3.12 British Airways

3.12.1 Table 3.12.1 below sets out the Applicant's response to the issues raised within the RR from British Airways [[RR-0530](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.12.1 Applicant's response to the matters raised by British Airways**

Topic	Matter raised in the RRs	The Applicant's response
Other – Affordability	1. Affordability: Expansion must be affordable for consumers and we need to	Current projections indicate that, even with the significant investment associated with the development, Gatwick Airport charges would remain

	be confident in the cost of delivery	highly competitive when compared to other London and European airports.
Other - Costs	2. Cost Transparency: We must be able to scrutinise costs of development in an open book and transparent way	<p>Gatwick Airport is privately owned and no taxpayer money would be used to finance this Project. The Project would be financed through a blend of debt, equity and airport charges.</p> <p>Further detail of Project costs and funding is set out in Section 3.2 of the <b>Funding Statement</b> [<a href="#">APP-009</a>].</p>
General	3. Environment and sustainability: The programme must have the strongest of environmental credentials and manageable wider community impact	<p><b>ES Chapter 6: Approach to Environmental Assessment</b> [<a href="#">APP-031</a>] sets out the approach to environmental assessment that has been used throughout the ES, with each topic chapter required to identify embedded and further mitigation following the assessment. The <b>Sustainability Statement</b> [<a href="#">APP-249</a>] has been produced to demonstrate that the principles of sustainability have been considered during the design of the Project and to show how these would be further embedded throughout its lifecycle, in accordance with relevant national, regional and local policy, guidance and standards.</p> <p>The <b>Mitigation Route Map</b> [<a href="#">APP-078</a>] provides an audit trail of the controls and mitigation measures on which the Environmental Statement relies to avoid, reduce and if possible, offset significant impacts of the development. This includes demonstrating how each of the measures are legally secured via ‘control documents’ set out in Table</p>

		1.3.1 of the <b>Mitigation Route Map</b> [ <a href="#">APP-078</a> ].
Socio-Economics and Economics	4. Consumer benefits: The right incentives need to be in place for expansion to be delivered for the primary benefit of consumers, now and in the future.	Increased capacity and choice will provide significant benefits to the consumer. Congestion premiums that are related to capacity constraints and are reflected in air fares would decrease, leading to lower fares for passengers (Section 8.10 of the <b>Needs Case</b> [ <a href="#">APP-250</a> ]).
Capacity and Operation	5. Operational resilience: Proven reliability of operations, including having in place the appropriate infrastructure and resilience for the expected aircraft movements and passengers. We understand that some of these elements – such as the cost of the project which will span several years and the ensuing benefit to the consumer – need to be fully developed and consulted on with airlines who are required to fund expansion under the current regulatory framework.	The Northern Runway Project is privately funded in its entirety. For more detail, please refer to the <b>Funding Statement</b> [ <a href="#">APP-009</a> ].

### 3.13 British Pipeline Agency

3.13.1 Table 3.13.1 below sets out the Applicant’s response to the issues raised within the RR from British Pipeline Agency [[RR-0531](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.13.1 Applicant’s response to the matters raised by British Pipeline Agency**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Compulsory Acquisition	The Applicant has included the WGPL Pipeline and ancillary easements together	The Applicant is regularly consulting with the British Pipeline Agency Limited (BPA). BPA acts as agent and

<p>and Compensation</p>	<p>with general access rights to the WGPL lease dated 13 June 1966 and made between the Applicant (1) and WGPL (2) within the terminal building ("the Terminal Building Lease") within the land to be permanently acquired. However, the Draft Order works' plans show that the proposed works are significantly to the south of the WGPL Pipeline and ancillary easements and access rights. It is difficult to see what rights could be required within this area (on the Applicant's current plans) which would justify the acquisition and sterilisation of WGPL's existing land rights, not least given that the WGPL Pipeline is such a critical national infrastructure asset. On 2 October 2023, the Applicant sent a letter to WGPL which contained the following statements: "As a company with interest(s) within the airport, we need to include land and property in which you have an interest within our DCO. Due to the size of the project and number of interests affected by it, it is necessary to include your rights interest in land within the DCO. The premises you occupy are included with the DCO for the</p>	<p>operator on behalf of the Walton-Gatwick Pipeline Company Limited (WGPL) both pre and post submission.</p> <p>The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of WGPL's undertaking because of the protective provisions included in the Part 5 of Schedule 9 of the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a> for the benefit of WGPL.</p> <p>The Protective Provisions in the draft DCO ensure that WGPL's apparatus will be protected, and access maintained during construction. The Applicant is not intending to extinguish any rights belonging to WGPL.</p> <p>The Applicant acknowledges WGPL's objection to the compulsory acquisition powers in respect of the plots which it has an interest in. The Applicant is engaged with WGPL to agree protective provisions to ensure that there is no detriment to the carrying on of the statutory undertaking. However, the Applicant will continue to seek compulsory acquisition powers over the land where WGPL's assets are located so that Gatwick Airport Northern Runway Project can be delivered in the event that it is not possible to acquire the rights by voluntary agreement.</p>
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	<p>purposes of planning; however, we have excluded them from DCO for the purposes of compulsory acquisition." It is not clear whether in referring to the "premises you occupy" the Applicant is referring solely to the Terminal Building Lease as opposed to the WGPL Pipeline together with any ancillary easements or access rights (which would more accurately be described as 'land within which you have an interest'). .</p>	
<p>Compulsory Acquisition and Compensation</p>	<p>WGPL (as owner) and BPA (as operator) are under a continuous obligation pursuant to statute and regulation (including but not limited to the Pipe-Lines Act 1962 and the Pipeline Safety Regulations 1996) to keep the WGPL Pipeline in good repair and maintenance, and to keep it safe. WGPL/BPA require access to the entirety of the WGPL Pipeline and the Terminal Building Lease to comply with their statutory and regulatory obligations and to safeguard the supply of aviation fuel to Gatwick Airport. If WGPL's rights under the Lease were to be extinguished and equivalent replacement rights not granted, WGPL/BPA would be unable to carry out maintenance and emergency</p>	<p>Noted. As stated above.</p>

	<p>works. This could ultimately mean the WGPL Pipeline could become hazardous thereby posing significant health and safety risks. Any disruption to the section of WGPL Pipeline (including any inability to repair or maintain the asset) would significantly impact the supply of jet aviation fuel to Gatwick Airport, possibly for months. Therefore, unless the Applicant can reasonably demonstrate how the land in which the WGPL Pipeline and ancillary easements and access rights are situated are necessary for the delivery of the project giving rise to the Draft Order, BPA's view is that these should not form part of the land to be acquired. If the Applicant does demonstrate that this land is necessary for the delivery of the project, it is essential that acceptable protective provisions are agreed between the Applicant and BPA</p>	
<p>Draft DCO, Consents and Agreements</p>	<p>It is hoped that acceptable protective provisions can be negotiated between the parties which, once agreed, should provide acceptable comfort to BPA (as agent for WGPL) to the extent that any live pipelines are affected by the Draft Order. Appropriate protective provisions should</p>	<p>GAL appreciates the importance of the WGPL pipeline to the airport and has no intention of taking any action that jeopardises the viability of this supply.</p> <p>A fee undertaking was provided to BPA's solicitors in November 2023 and discussions are currently ongoing as to how best to preserve WGPL's rights to</p>



	<p>also mitigate any health and safety concerns. The agreement of protective provisions is of critical importance to ensure that the WGPL Pipeline retains all necessary protections and rights to enable WGPL/BPA to repair, maintain and operate WGPL Pipeline and the wider pipeline network (of which it is a part) in accordance with its statutory and regulatory framework. It should be noted that as at the date of this submission, we await a cost undertaking from HSF to cover BPA's legal costs in relation to the negotiation and agreement of such protective provisions as agent for WGPL. The Examining Authority will be updated on the progress of any negotiations. In the absence of acceptable protective provisions or the removal of the WGPL Pipeline and ancillary easements from the land to be acquired in the Draft Order, BPA will have to object to the Draft Order as agent for WGPL</p>	<p>repair, maintain and operate the WGPL pipeline.</p>
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### 3.14 Brockham Parish Council

3.14.1 Table 3.14.1 below sets out the Applicant's response to the issues raised within the RR from Brockham Parish Council [[RR-0532](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.14.1 Applicant’s response to the matters raised by Brockham Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Traffic and Transport	The rural road network is already operating at maximum capacity with negative impacts such as speeding, pollution and traffic congestion. An additional 70% of passengers through the airport will certainly result in increased road traffic and its effects on the community irrespective of attempts to direct passengers to public transport (which in this locality is poor).	Strategic transport modelling has been undertaken for the region, as set out in Chapters 12 of the <b>Transport Assessment</b> [AS-079]. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant effects are identified.
Socio-Economics and Economics	Should the employment levels suggested in the application ever be achieved there would be concern on the additional burden on housing, medical facilities and education in the area. The supposed economic benefits may accrue to the shareholders and in business taxation to the residents of Sussex and Crawley but they certainly do not benefit Surrey and thus Brockham. However the cost burden of the project does so.	An assessment of the potential demand for housing has been added to <b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> [APP-201] Section 6. It concludes that there will not be significant impacts on housing, because of the housing growth that is already planned.  <b>ES Chapter 17: Socio-Economics</b> [APP-042] provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services). It concludes that the socio-economic effects of the Project on community infrastructure are not significant.
Noise and Vibration	Noise is a problem in terms of concentrated traffic on parts of the parish from Route 3 & Route 4 NPR’s and the increase by 30+% of aircraft movements will increase this	The assessment of aircraft noise focuses on an average summer day in order to assess the season of highest noise in accordance with CAA guidance. During the year of greatest noise impact the Project is forecast to

	<p>nuisance rather than reduce it as suggested in the application.</p>	<p>add 19% to the summer season air traffic during the 16 hour day period from 0700 to 2300. The greatest increase at night is forecast to be 10% as described above. Importantly no new flight paths are required so the noise impacts are largely as a result of more aircraft in the same locations.</p> <p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>
<p>Water Environment</p>	<p>River Mole Brockham has historically suffered from flooding from the River Mole. In recent years major works have been achieved that alleviate much of the flooding problem. The potential to increase run off at Gatwick and thus increase</p>	<p>GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The model extends approximately 1.5km downstream of the NRP boundary which is considered sufficient to fully assess any potential</p>

	<p>release into the River Mole, particularly at peak weather event times, is of major concern. In addition the provision of sewage facilities for the major uplift in passenger numbers provides the threat of increased discharges of untreated or insufficiently treated waste water into the River Mole. As Brockham is situated downstream of Gatwick there is a significant possibility of serious negative impacts on the community.</p>	<p>downstream effects. The Environment Agency reviewed and accepted the updated baseline model that has informed <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">AS-078</a>] in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>].</p> <p>Modelling of the wastewater sewer system undertaken for <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] demonstrates that with mitigation measures included in the NRP (see Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>]) the Gatwick wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP.</p>
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		<p>The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of the pumping station upgrades. The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its license as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development and they would recoup their costs through infrastructure charges to GAL. The status of these discussions will be reported in the Statement of Common Ground between GAL and Thames Water, to be submitted at the relevant Deadline specified by the ExA.</p>
<p>Greenhouse Gases</p>	<p>It is obvious to all that the proposed increase in aircraft movements will bring about an increase in carbon emissions. Realistic estimates have been shown that by 2038 Gatwick could contribute as much as 5%+ of the whole of the UK's carbon emissions. The Brockham Parish Council on behalf of its</p>	<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development,</p>

	<p>residents could not support such unsustainable growth.</p>	<p>and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant.</p> <p>It is not for the Applicant or for the examination to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>
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### 3.15 Buckland Parish Council

3.15.1 Table 3.15.1 below sets out the Applicant's response to the issues raised within the RR from Buckland Parish Council [[RR-0547](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.15.1 Applicant's response to the matters raised by Buckland Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
Traffic and Transport	<p>While local people accept the benefits of having an airport in this area, any further increase to the current levels of traffic, both in the air and on the surface, are not acceptable to this village. Surface transport The A25 is already a busy road as an artery between east and west. The M25 is situated a</p>	<p>Strategic transport modelling has been undertaken as part of the Application, which includes the parish of Buckland. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work,</p>

	<p>short distance from Buckland above the village on the North Downs. In times of motorway problems/closures the A25 is used as a substitute route which increases traffic through the village to a very high level. An increase in traffic would not be practical or sustainable. The A25 is frequently slow due to traffic volume. Many motorists will be aware of frequent holdups/delays/accidents on the M25 and will take short cuts through the rural areas. The infrastructure in this area and current state of the roads cannot sustain further increases in traffic.</p>	<p>no significant increases in traffic are expected through Buckland.</p>
<p>Noise and Vibration</p>	<p>Buckland villagers also suffer from road traffic noise especially at night, at what is believed to have a detrimental effect on health and welfare. Gatwick night flights have been steadily increasing since 2014, and while diminished during the pandemic, they are now back at 2019 levels. It is understood that a further increase of 70% is proposed by GAL. This also applies to freight flights which predominate. All this extra activity drives additional traffic on our local roads during otherwise quiet period.</p>	<p>The impact of increases in road traffic noise from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [<a href="#">APP-039</a>] and <b>ES Appendix 14.9.4 Road Traffic Noise Modelling</b> [<a href="#">APP-174</a>]. The assessment considered traffic noise changes during the peak periods of construction, and in the opening year of the highway scheme, 2032 and 15 years later in 2047. no significant effects from increases in road traffic noise are predicted either in the vicinity of the highways scheme or on the wider road network, either during construction or operation.</p>

		<p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p>
Traffic and Transport	<p>The North Downs railway runs through the north side of the A25 through Buckland with connections to Gatwick. Currently there are frequent hold ups at the railway crossing on the B2032 Station road and further railway crossing closures would have an extreme effect on local road traffic. Additionally, any increase in rail traffic would be detrimental in terms of noise and the effect on the environment.</p>	<p>The Project is not proposing any increases in service frequency on the North Downs line. The increase in frequency shown is committed as part of proposals by Network Rail and the train operator and is assumed to occur in both the future baseline and with Project scenarios. This is explained in paragraph 9.4.9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment in the <b>Transport Assessment</b> <a href="#">[AS-079]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a> indicate that no additional service is required on the North Downs Line as a result of the Project.</p>
Noise and Vibration	<p>Buckland experiences aircraft noise/pollution from flight departures from both Gatwick and Heathrow and from</p>	<p>The cumulative noise and vibration effects of the Project are assessed in the Section 14.11 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. ES</p>



	<p>helicopter and light aircraft traffic flying along an east/west over Buckland. The potential proposed Airspace changes for the south east also threaten the Buckland area. Aircraft departing Heathrow currently overfly Buckland below 7,000 feet. While people may be able to insulate their houses from some of the noise effects, it is impossible to apply this notion to the enjoyment of their gardens during the daylight hours and requires windows to be shut whatever the overnight temperature. Any night flights are particularly intrusive in this otherwise quiet area. The debilitating effect of disturbed sleep on health and welfare is well documented.</p>	<p>Chapter 14 reports as assessment of the increase in overflights from the Project that includes a quantification of the baseline level of overflights from all airports up to 35 miles from Gatwick. In the worst case areas the increases in total overflights experienced as a result of the Project in 2032 compared to the baseline in 2032 is expected to be 20% on an average summer day, but in Buckland the increase will be less due to Heathrow flights. The noise assessment, referred to above, provides a full assessment of sleep disturbance.</p>
<p>Air Quality &amp; Greenhouse Gases</p>	<p>Any increase in air traffic over this area would have detrimental effects on the air quality and CO2 emissions.</p>	<p>An assessment of changes to air quality and greenhouse gases due to the Project is provided in <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p> <p>The air quality assessment has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice</p>

		<p>guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant.</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to</p>
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		<p>closely monitoring aviation and other trajectories to ensure compliance.</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories. However, the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in Paragraph 16.10.4 of <b>ES Chapter 16: Greenhouse Gases [APP-041]</b> that references the IEMA Guidance noting that <i>“The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.”</i></p>
<p>Water Environment</p>	<p>Buckland, while not directly affected as much as Brockham, can experience some flooding and the River Mole is already subject to discharges without further pressure from a busier Gatwick. Serious flooding locally can also increase the</p>	<p>GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The model extends approximately 1.5km downstream of the NRP boundary which is considered sufficient to fully assess any potential downstream effects. The Environment</p>

	<p>level of road traffic diverting through the village.</p>	<p>Agency reviewed and accepted the updated baseline model that has informed <b>ES Appendix 11.9.6: Flood Risk Assessment [AS-078]</b> in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11: Water Environment [APP-036]</b>.</p>
<p>Greenhouse Gases</p>	<p>Buckland Parish Council endeavours to encourage the village to adopt 'green' policies to avert the effects of climate change. Any further pollution would endanger the policies and the wildlife. This area as stated is one of outstanding natural beauty, and a further expansion of the airport encouraging road and air traffic will increase</p>	<p>Please refer to the comment above regarding the assessment of GHG emissions and the emissions sources included within this assessment.</p>

	CO2 emissions and pollution to an unacceptable environmental level. This would also apply to the construction period of the airport facilities when increased traffic would be passing through the area.	
Socio-Economics and Economics	Buckland Parish Council questions the validity of the Gatwick Airport Limited economic forecasts which appear to overstate the economic benefits and understate or omit to consider significant economic, social and environmental costs to the area. Summary Buckland Parish Council strongly opposes the expansion plans of GAL to expand the airport through commercial use of the emergency northern runway.	<p>The assessment of national impacts (<b>National Economic Impact Assessment</b> [APP-251]) 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, GAL has used 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><b>ES Appendix 4.3.1: Forecast Data Book</b> [APP-075] presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project.</p>

### 3.16 Burstow Parish Council

3.16.1 Table 3.16.1 below sets out the Applicant's response to the issues raised within the RR from Burstow Parish Council, including signposting to the relevant sections of the DCO Application.

**Table 3.16.1 Applicant’s response to the matters raised by Burstow Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration & Traffic and Transport	Being close to the airport, flights have affects on our residents whether it be noise from aircraft or from increased traffic movements to/from the airport.	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and is some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road, and Peeks Brook Lane to the East in the Burstow area.</p> <p>Mitigation measures to reduce noise are described in Sections 14.8 and 14.9 of <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a> and include:</p> <ul style="list-style-type: none"> <li>- Avoiding use of the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case.</li> <li>- Differential charges for aircraft with higher noise levels to help incentivise quieter aircraft.</li> <li>- The continuation of a various operating procedures including departure noise limits, as governed by the DfT.</li> </ul>

		<ul style="list-style-type: none"> <li>- The continuation of the Night Restrictions, operating restrictions, as governed by the DfT.</li> <li>- A Noise Envelope, to legally limit noise during the day (0700-2300) and night (2300-0700) (see <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a> as enforced through the Development Consent Order (see sections 15 and 16 of the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a>).</li> <li>- A substantially improved noise insulation scheme with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme see <b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>.</li> </ul> <p>Strategic transport modelling has been undertaken for the region, as set out in Chapter 12 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway</p>
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		network and no significant effects are identified.
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### 3.17 Capel Parish Council

3.17.1 Table 3.17.1 below sets out the Applicant’s response to the issues raised within the RR from Capel Parish Council [[RR-0570](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.17.1 Applicant’s response to the matters raised by Capel Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration & Air Quality	There will be an increase in noise, congestion and a decrease in air quality.	<p>The impact of aircraft noise from the Project has been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [<a href="#">APP-039</a>].<a href="#">APP-039</a>. Significant noise effects are not predicted in Capel Parish. Capel is one of 7 Community Representative Locations for which details of the noise level changes are provide in <b>ES Appendix 14.9.2 Air Noise Modelling</b> [<a href="#">APP-172</a>].</p> <p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>]<a href="#">APP-038</a>] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>]<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to</p>



		local air quality regardless of significance.
Traffic and Transport & Health and Wellbeing	The increase in traffic on rural roads from passenger and support vehicles will cause significant congestion, increase wear and tear on road surfaces and higher carbon and pollutant emissions leading to higher costs and potentially poorer health for Surrey residents and no mechanism of mitigation or compensation has been suggested. As such the scheme is wholly unacceptable.	<p>Strategic transport modelling has been undertaken for the region, as set out in Chapters 12 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>.<a href="#">AS-079</a>]. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant impacts are identified. No mitigation is therefore necessary. Local authorities are responsible for the maintenance of the public highway and therefore the condition of road surfaces.</p> <p>Section 18.8 ‘Health and Wellbeing Effects from Changes in Transport Nature and Flow Rate’ of <b>Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043APP-043]</a> considers changes in road traffic affecting road safety, travel times, accessibility and active/sustainable travel. Whilst there would be increases in traffic, the Project includes substantive highway improvements that manage the additional traffic volumes and enhance the active and sustainable transport routes to, and around, the airport.</p>
Socio-Economics and Economics	Gatwick Ltd will benefit while Surrey residents pay much of the cost with almost no benefit.	The assessment in <b>Environmental Statement Appendix 17.6.1: Socio-Economic Data Tables</b> <a href="#">[APP-197]</a> Section 3 sets out the likely distribution of new employees, including Surrey residents, based on the current

		<p>distribution of employees. Surrey residents will be able to benefit from the job opportunities.</p> <p>GAL proposes enhancing the ability of target groups to access employment through the <b>Employment, Skills and Business Strategy</b> [<a href="#">APP-198</a>].<a href="#">APP-198</a>]. The Implementation Plans that support 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 <b>ES Chapter 17: Socio-Economic</b> [<a href="#">APP-038APP-038</a>] that the Local Study Area incorporates the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge. The selection of output areas is based upon a 'best fit' match of the urban area surrounding Gatwick, incorporating the main towns of Crawley and Horley and some smaller settlements located near to the Project site boundary such as Charlwood, Copthorne, Hookwood, Ifieldwood, Salfords and Smallfield. A map of the Local Study Area is also provided.</p> <p>The DCO Application was accompanied by <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [<a href="#">APP-201APP-201</a>] 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>
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		<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>
<p>Socio-Economics and Economics</p>	<p>The projected increase in employment is dubious when set against the rapidly reducing staff numbers due to recent automation of baggage check-in and passport control for example. Moreover, many of the suggested job increases will be outside the area most impacted</p>	<p><b>ES Appendix 4.3.1: Forecast Data Book</b> <a href="#">[APP-075APP-075]</a> presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Section 12.1 discusses the impact of automation. It states that employment growth due to the Project takes into account future efficiency gains driven by ongoing automation and new technologies.</p> <p>The economic benefits are clustered around the airport. Table A4.2 of <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> sets out the employment by local authority area. Table A4.2 of <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> sets out the employment by local authority area.</p> <p>The <b>Employment, Skills and Business Strategy (ESBS)</b> <a href="#">[APP-198APP-198]</a> describes ways to maximise economic benefits for communities and businesses by creating the conditions for sustainable employment, skills development and career progression; and enhancements</p>

		to the productivity and growth of business.
Compulsory Acquisition and Compensation	There will be considerable expansion of car parks and airport terminals and the compulsory purchase of land to accommodate construction vehicles, flood plains and road access	<p>The Applicant has taken a proportionate approach to the Application for compulsory acquisition powers in the <b>Draft DCO</b> <a href="#">[AS-127]</a>, and it is not the intention to acquire more land than is required for the Project. Temporary and Permanent Land has been included within the <b>Land Plans</b> <a href="#">[AS-015]</a> The Applicant has taken a proportionate approach to the Application for compulsory acquisition powers in the <b>Draft DCO</b> <a href="#">[AS-127]</a>, and it is not the intention to acquire more land than is required for the Project. Temporary and Permanent Land has been included within the Land Plans <a href="#">[AS-015]</a> to allow for expansion of key airport services including the expansion of car parks within the current airport boundary.</p> <p>However, the private treaty negotiations have proposed that any land acquired for the Project that is later identified as surplus to the needs of the Project will be returned to the landowner, reflecting the Crichel Down principles that apply with respect to land acquired compulsorily.</p>
Noise and Vibration	The proposal offers no respite from or reduction of the already disturbing night flights and no financial contribution to the community toward infrastructure upkeep or noise reduction measures.	The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to

		<p>137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>A substantially improved noise insulation scheme will be offered as part of the Project with an Outer Zone of Approximately 3,900 homes including part of Capel, and a Schools Insulation Scheme see <b>ES Appendix 14.9.10 Noise Insulation Scheme</b> [<a href="#">APP-180APP-180</a>].</p>
Capacity and Operations	<p>The added capacity could have been used to reduce the operating window of flights with a total ban from 23:00 to 06:00 but instead shows itself to be self-centred exercise to benefit shareholders with little or no concern for the residents under the flight path or in the vicinity of the airport.</p>	<p>Existing restrictions are in place at London Gatwick which limit the number of flights that may take place in the core night period and thus act to control the impacts of night noise. The Northern Runway Project proposal includes specific further mitigation measures to reduce night noise, including not operating the northern runway routinely between 23:00 and 06:00 hours. The changes in noise levels expected from the Project at night-time are smaller than during the day because the northern runway would generally not be used between 23:00 and 06:00 hours and because the night flight restrictions are assumed to limit growth in night flights.</p>

### 3.18 Charlwood Parish Council

3.18.1 Table 3.18.1 below sets out the Applicant’s response to the issues raised within the RR from Charlwood Parish Council [[RR-0697](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.18.1 Applicant’s response to the matters raised by Charlwood Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Traffic and Transport	Antisocial taxi drivers and illegal parking impacts public amenity and increase of this will exacerbate this issue.	GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ] sets out GAL’s commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.
Traffic and Transport	Traffic congestion impacts our community in a way not experienced by other communities.	Strategic transport modelling has been undertaken as part of the Application, which includes the parish of Charlwood. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work, a small increase in traffic (around 5%) is expected through Charlwood although the assessment indicates that this would not give rise

		<p>to significant environmental effects or require mitigation.</p> <p>Nevertheless, as set out in commitment 14 of the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>], GAL will set aside a Transport Mitigation Fund (TMF) to give assurance that resource will be available for additional interventions in support of the commitments, or to provide mitigation of an unforeseen or unintended impact from the Project. The intention of this fund is to support further interventions in the area surrounding the Airport should they be necessary as a direct result of the Project. This may relate to physical infrastructure, changes to public transport services or facilities off-airport. Requests for and decisions on allocation from the TMF would be addressed through the Transport Forum Steering Group (TFSG) and sub-groups of it.</p>
Traffic and Transport	Proposals of road changes will negatively impact our community and appear to remove vital infrastructure used by vulnerable road users (pedestrians and cyclists), without viable alternatives being provided.	The Project includes surface access improvements, as summarised in Section 2.2 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. These improvements include new and improved provisions for pedestrians and cyclists as part of the proposed highway works. The active travel infrastructure will maintain and improve existing routes and introduce new routes to allow travel to and between destinations within the Airport.
Traffic and Transport	Public transport options are inadequate	<b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ] sets out the

		<p>bus and coach improvements identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to these services, or others which result in an equivalent level of public transport accessibility. The mode share commitments made in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> are drawn from the modelling work which includes the bus and coach services identified in that document.</p>
Traffic and Transport	Active travel proposed options are inadequate	<p>Active travel routes benefiting from the surface access improvement works (as set out in Section 2.2 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>) include those between Longbridge roundabout, North Terminal and South Terminal; southern Horley and the Airport; and between Balcombe Road and South Terminal. They also offer further benefits for active travel users on and around Longbridge roundabout and those travelling between Longbridge roundabout and Riverside Garden Park.</p> <p>The proposed facilities selected for active travel routes have been based on expected demand levels and guidance in the DfT's Local Transport Note 1/20 has been applied to determine the appropriate widths provided for cyclists.</p>
Health and Wellbeing	Air pollution disproportionately impacts the health of our community	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the air quality assessment for the Project. The assessment concludes that the impact of the</p>



	<p>in a way not experienced by other communities.</p>	<p>Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Section 18.8 ‘Health and Wellbeing Effects from Changes to Air Quality’ <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> considers the population health implication of the changes due to the Project. The health assessment has regard to disproportionate effects to vulnerable groups within the health study areas. Charlwood forms part of the smallest health study area that considers effects closest to the airport, the ‘nine ward area’.</p>
<p>Noise and Vibration</p>	<p>Noise pollution disproportionately impacts the health of our community in a way not experienced by other communities</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In the Charlwood area the Project will increase aircraft noise and in some areas, and to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield</p>

		<p>Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East, not in Charlwood Village. Charlwood is one of 7 Community Representative Locations for which details of the noise level changes are provide in <b>ES Appendix 14.9.2 Air Noise Modelling</b> [<a href="#">APP-172</a>].</p> <p>A substantially improved noise insulation scheme will be offered as part of the Project with an Outer Zone of approximately 3,900 homes including Charlwood, and a Schools Insulation Scheme see <b>ES Appendix 14.9.10 Noise Insulation Scheme</b> [<a href="#">APP-180</a>].</p>
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### 3.19 Cheshire West and Chester Borough Council

3.19.1 Table 3.19.1 below sets out the Applicant’s response to the issues raised within the RR from Cheshire West and Chester Borough Council [[RR-0702](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.19.1 Applicant’s response to the matters raised by Cheshire West and Chester Borough Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Compulsory Acquisition and Compensation	I object to the DCO Application for the northern runway project. The concern is that this will negatively impact their interest and the tenant (Q Park) being able to operate their car parking business. GAL have informally offered a land swap (an alternative to compulsory acquisition), but we have not been provided with commercial terms and this has not been signed-off. I	Since this Relevant Representation was made, The Applicant has met with the Interested Party a number of times and has provided and discussed commercial terms. These discussions are ongoing, and updates will be issued at each relevant deadline.

	<p>am an asset manager at Patrizia, acting on behalf of my client, Cheshire West and Chester Borough Council. I object to the proposed DCO application, as if approved it would negatively impact my clients interest, and also cause significant disruption to the operation of the car parking business on site (Q Park).</p>	
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### 3.20 Chiddingfold Parish Council

3.20.1 Table 3.20.1 below sets out the Applicant’s response to the issues raised within the RR from Chiddingfold Parish Council [[RR-0708](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.20.1 Applicant’s response to the matters raised by Chiddingfold Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration, Air Quality & Traffic and Transport	Noise, pollution, excess traffic, safety.	Noted. The assessments undertaken for each topic can be found in the following application documents: <ul style="list-style-type: none"> <li>• <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>]</li> <li>• <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>]</li> <li>• <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]</li> </ul>

### 3.21 Chiddingstone Parish Council

3.21.1 Table 3.21.1 below sets out the Applicant’s response to the issues raised within the RR from Chiddingstone Parish Council [[RR-0709](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.21.1 Applicant’s response to the matters raised by Chiddingstone Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
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<p>Noise and Vibration</p>	<p>1. Aircraft noise. Chiddingstone parish is directly under the arrivals flight path and already suffers from intolerable aircraft noise. Any expansion of the airport would increase aircraft noise further.</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In the Chiddingstone area the Project will increase aircraft noise and in some areas, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [APP-039]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Chiddingstone is one of 7 Community Representative Locations for which details of the noise level changes are provide in <b>ES Appendix 14.9.2 Air Noise Modelling</b> [APP-172].</p>
<p>Greenhouse Gasses</p>	<p>2. Pollution. Expansion of Gatwick Airport on the scale proposed would increase very substantially the CO2 emissions and other climate impacts associated with the airport's operations and flights.</p>	<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16 Greenhouse Gases</b> [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions</p>

		<p>arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Noise and Vibration	<p>3. Night flights. A ban on night flights should be a condition of any expansion at Gatwick. The airport should also be required to set out a comprehensive package of measures to incentivise the use of the quietest aircraft at night outside the hours of a ban.</p>	<p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p>
Planning and Policy	<p>4. No need. Gatwick Airport's overall case for expansion does not comply with the</p>	<p>Substantial documentation has been submitted with the DCO Application to demonstrate the need for the NRP.</p>

	<p>Airports National Policy Statement which requires airports (other than Heathrow) to demonstrate sufficient need to justify their expansion proposals, additional to / different from the need which would be met by the provision of a Northwest Runway at Heathrow.</p>	<p>Notably, very few representations engage with the detail of the submitted case or with the demonstrable need to provide more capacity. Gatwick has the world’s busiest (daytime) single runway and a documented waiting list from airlines for more slots. It has a clear need for additional operational capacity and resilience <b>today</b> and all forecasts show that need will increase.</p> <p>The relevant paragraph of the ANPS for these purposes is paragraph 1.42 which provides:</p> <p><i>“As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application’s individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>No conflict arises with the ANPS, therefore, from seeking DCO consent for more intensive use of Gatwick Airport – in fact, the ANPS recognises that <i>“it may well be possible”</i> to make the case for such growth, although each application will have to go</p>
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		<p>through the relevant process and to be considered on its merits.</p> <p>The merits of the case for the NRP are set out extensively in the application documents; notably in the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the <b>Needs Case</b> <a href="#">[APP-250]</a>, supported by the <b>Forecast Data Book</b> <a href="#">[APP-075]</a>. It would not be productive to set the case out again here but there are some specific issues raised in the representations which are responded to here.</p>
<p>Landscape, Townscape and Visual</p>	<p>The proposed expansion of Gatwick Airport would have a huge adverse environmental effect on our community in the Green Belt and High Weald AONB.</p>	<p>Section 8.9 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> includes a thorough assessment of effects on the perception of tranquillity within nationally designated landscapes as a result of an increase in the number of visible and/or audible overflying aircraft up to 7,000 ft above local ground level. The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of <b>ES Landscape, Townscape and Visual Resources Figures</b> <a href="#">[APP-062]</a> together with nationally designated landscapes and 10 popular and well-known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline</p>

		<p>situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived</p>
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### 3.22 Churt Parish Council

3.22.1 Table 3.22.1 below sets out the Applicant’s response to the issues raised within the RR from Churt Parish Council [[RR-0829](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.22.1 Applicant’s response to the matters raised by Churt Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
<p>Greenhouse Gases &amp; Landscape, Townscape and Visual</p>	<p>In 2020 Churt Parish Council set out its aspirations for achieving net zero carbon emissions by 2050 in the Churt Environmental Charter: Net Zero by 2050. Churt Parish Council believes that the emissions from the additional flights envisaged by Gatwick’s Northern runway expansion plans would cause significant harm to the residents and harm to the outstanding natural environment of the Surrey Hills AONB that surrounds Churt, would be a retrograde step in trying to achieve</p>	<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16 Greenhouse Gases</b> [<a href="#">APP-041</a>]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>



	<p>overall net-zero carbon emissions as well as being incompatible with the aspirations set out in Churt’s Environmental Charter: Net Zero by 2050.</p>	<p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a comprehensive cumulative assessment of aviation emissions.</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in Paragraph 16.10.4 of <b>ES Chapter 16 Greenhouse Gases [APP-041]</b> that references the IEMA Guidance noting that <i>“The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.”</i></p>
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### 3.23 Colegate Parish Council

3.23.1 Table 3.23.1 below sets out the Applicant’s response to the issues raised within the RR from Colegate Parish Council [[RR-0899](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.23.1 Applicant’s response to the matters raised by Colegate Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Traffic and Transport, Water Environment, Air Quality & Noise and Vibration	Colgate PC are concerned for the following reason: Transport and infrastructure pressure Flood risk Increase in Air pollution increase noise	Noted. The assessments undertaken for each topic can be found in the following application documents: <ul style="list-style-type: none"> <li>• <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>]</li> <li>• <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>]</li> <li>• <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>]</li> <li>• <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]</li> </ul>

### 3.24 Communities Against Gatwick Noise Emissions (CAGNE)

3.24.1 Table 3.24.1 below sets out the Applicant’s response to the issues raised within the RR from CAGNE [[RR-0556](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.24.1 Applicant’s response to the matters raised by CAGNE**

Topic	Matter raised in the RRs	The Applicant’s response
General – Opposition	1.3. Overall, CAGNE objects to the Northern Runway Project (NRP) and will request that this DCO application is refused.	Noted.
Planning and Policy	1.4. The project conflicts with national policy (namely, the Airports NPS and the “Making Best Use of Existing Runways” policy (2018)), not least as it will introduce a new runway at Gatwick. The significant negative environmental and social impacts associated with the project (including (but not limited to) the associated (i) noise increases, (ii) declines in	The application of planning policy for the Project is set out in the <b>Planning Statement</b> [ <a href="#">APP-245</a> ]. In response to this representation, we would draw CAGNE’s attention to: <ul style="list-style-type: none"> <li>• <b>Section 8.2</b> which explains the relationship of the Project to the ANPS and the policy of making best use, and</li> <li>• <b>Section 9</b> which contains the overall planning balance, taking</li> </ul>

	<p>air quality, (iii) traffic impacts due to inadequate surface access and (iv) climate impacts), along with the lack of transparency as to any suggested community investment beyond the airport, substantially outweigh any purported benefits. If approved, the project will result in serious detriment to local communities and nature in the areas of Sussex, Surrey, and Kent, as well as the planet beyond. Moreover, the project will effectively thwart the long-standing and careful national planning for airport expansion in the Southeast. By jumping the gun in this way, before robust and necessary cumulative assessments can be carried out (not least in relation to the policy-supported third runway project at Heathrow), the NRP risks undermining the national airport policy framework and resulting in an unjustified environmental cost to expanding airport capacity in the southeast.</p>	<p>account of air quality, traffic and climate, socio-economics and other assessments contained in the relevant chapters of the <b>Environmental Statement</b>.</p> <p>In respect of a new runway at Heathrow Airport, whilst the ANPS sets out the policy considerations for Heathrow Airport’s third runway, it does not in any way exclude Gatwick Airport from the policy encouragement to intensify its use and capacity. Paragraph 1.42 of the ANPS states that <i>“the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i> As such, no conflict arises between the ANPS and the NRP. This is set out in further detail in Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a>.</p>
<p>Planning and Policy</p>	<p>The Project Conflicts with National Policy on Airport Expansion 2.1. Government policy on airport expansion is set out in the Airports NPS and in the “Making Best Use of Existing Runways” policy (“MBU”) (both dated June 2018). The Airports</p>	<p>The application of planning policy for the Project is set out in the <b>Planning Statement</b> <a href="#">[APP-245]</a>. Most notably, Section 8.2 of the <b>Planning Statement</b> explains that whilst the Airport National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it does not in any</p>

	<p>NPS clearly supports only one new runway in the Southeast and chooses Heathrow to deliver this via its third runway project.</p>	<p>way exclude Gatwick Airport from the policy encouragement to intensity its use and capacity. Paragraph 1.42 of the ANPS states that <i>“the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>As such, no conflict arises between the ANPS and the NRP.</p>
<p>Planning and Policy</p>	<p>2.2. The NRP will effectively result in a new runway at Gatwick. GAL seeks to emphasise that the project works will relate to Gatwick’s existing emergency / stand-by runway. However, the scope of works involved is extensive (involving significant changes to, and introduction of, new taxiways and airport facilities, including a new aircraft holding area and new pier) and the entire centreline of that “existing” runway will need to be moved 12m to the north. As a result of these works, Gatwick will be able to operate two runways in a way that is currently impossible, effectively resulting in a new runway and allowing for dual-runway airspace. This is in contrast to the present situation where Gatwick can only ever operate one of its runways (main or</p>	<p>There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [APP-029]. The existing northern runway is used when the main runway is closed, such as in an emergency.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> [AS-133]. The Project does not entail the construction of a new runway or complete re-building of the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5:</b></p> <ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same</li> </ul>

	<p>emergency) at any given time. In short, the NRP will transform Gatwick from a single-runway airport to effectively a dual-runway airport. That does not fall within the MBU Policy, nor is it supported by the Airport NPS. The NRP is not making best use of an “existing runway”, it is effectively producing a new runway.</p>	<p>width and length of the existing runway.</p> <ul style="list-style-type: none"> <li>• The repositioned northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m width of new runway.</li> </ul> <p><b>Section 8.2 of the Planning Statement [APP-245]</b> sets out the relevance of the policy of making best use to the Project.</p>
<p>Planning and Policy</p>	<p>2.3. Indeed, the scale of the NRP as a Nationally Significant Infrastructure Project (both in aviation and highways terms) is also indicative that the project goes beyond the local planning focus of the MBU policy (see MBU at 1.29), which remains a relevant policy within this process.</p>	<p>Paragraph 1.29 of Beyond the Horizon: The future of UK aviation (Making best use of existing runways) reiterates the Government’s support for airports, beyond Heathrow, making best of use of their existing runways. The paragraph goes on to explain that any proposals should be judged by the relevant planning authority. In the case of the NRP, the relevant planning authority is the relevant Secretary of State as the Project constitutes a Nationally Significant Infrastructure Project under the Planning Act 2008.</p> <p>This approach is also consistent with ANPS paragraph 1.42 which contemplates MBU applications being made for planning or development consent.</p>
<p>Planning and Policy</p>	<p>2.4. Furthermore, because the NRP conflicts with national airport policy, it means that, were the NRP to be approved, the national benefits associated with expanding airport capacity in the Southeast would only be</p>	<p>The NRP does not conflict with national aviation policy. The application of planning policy for the Project is set out in the <b>Planning Statement [APP-245]</b>, most notably in Section 8.2.</p>

	<p>achieved in part but alongside a disproportionate amount of harm.</p>	
<p>Planning and Policy</p>	<p>2.5. In this context, the failure to carry out a proper cumulative effects assessment of Heathrow’s expansion along with the NRP (notwithstanding PINS’ request that this be included in the Environmental Statement (“ES”)) breaches the EIA Regulations and undermines the lawfulness of the application materials. The “sensitivity test” included in Chapter 20 is inadequate.</p>	<p>The reason that the Project’s central case assumes there would not be a third runway at Heathrow Airport is explained in <b>ES Chapter 6: Approach to Environmental Assessment</b> [<a href="#">APP-031</a>] at paragraph 6.3.59.</p> <p>A third runway at Heathrow is not sufficiently certain to form a central assumption for the NRP application and, by undertaking an assessment of the likely significant effects of the NRP assuming no third runway, the Environmental Statement assesses the likely worst case effects of Gatwick’s expansion.</p> <p>Nevertheless, both the Environmental Statement and the Needs Case do consider the implications if a third runway was developed at Heathrow. In particular, the <b>Needs Case</b> [<a href="#">APP-250</a>]:</p> <ul style="list-style-type: none"> <li>• undertakes a forecasting sensitivity assuming the third runway is operational (see from paragraph 6.6.10);</li> <li>• explains how Gatwick and Heathrow are operationally and commercially different and complementary to one another (see from paragraph 5.2.53); and</li> <li>• explains that there are no current plans for the third runway such that, at best, a third runway could not be</li> </ul>

		<p>developed until the mid-2030s at the very earliest, whilst the NRP could be operational from 2029, meeting a pressing short and medium term need that a third runway at Heathrow cannot meet (see from paragraph 5.2.43).</p>
Traffic and Transport	<p>3.1. Surface access has always been a main issue for expansion at Gatwick (and a key reason why the Airport Commission found in favour of Heathrow over Gatwick as the location for a new runway in 2015).</p>	<p>The Project includes surface access improvements, as summarised in Section 2.2 of the <b>Transport Assessment</b> [AS-079]. These improvements include new and improved layouts for the South Terminal, North Terminal and Longbridge roundabouts, as well as enhancements to the A23 London Road and M23 Gatwick Spur.</p> <p>Extensive modelling work has been undertaken, as set out in Chapter 12 for strategic modelling and Chapter 13 for microsimulation modelling in the <b>Transport Assessment</b> [AS-079]. Based on the modelling assessments, together with the proposed highway improvement works, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works already proposed.</p>
Traffic and Transport	<p>3.2. The NRP's impact on surface access is unacceptable. CAGNE has instructed expert transport consultants to review the Applicant's transport assessment in the ES who have concluded that the ES omits various matters which means</p>	<p>The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the <b>Transport Assessment</b> [AS-079] and detailed information is provided in <b>Transport Assessment Annex B - Strategic</b></p>

	<p>that impacts are either not assessed at all or adverse impacts are downplayed. Furthermore, there is a lack of transparency regarding the Applicant's modelling of surface access, which has prevented interested parties from properly scrutinising the data. We expect the Applicant to provide this information early on in the examination process.</p>	<p><b>Transport Modelling Report</b> [<a href="#">APP-260</a>].</p>
<p>Traffic and Transport</p>	<p>3.3. We reserve the right to submit more detailed representations in relation to the Applicant's transport assessment in due course, but issues include (by way of example only):</p> <ul style="list-style-type: none"> <li>• the modelling is strategic in nature, lacking any detailed analysis of local traffic conditions affected by the scheme beyond the immediate environs of the airport</li> <li>• there is a failure to consider operational effects at junctions beyond the modelled area</li> <li>• there are various inconsistencies and inaccuracies in the selection of the assessed peak time periods</li> <li>• the Applicant's reliance on rail use, notwithstanding known capacity issues and</li> </ul>	<p>The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and detailed information is provided in <b>Transport Assessment Annex B - Strategic Transport Modelling Report</b> [<a href="#">APP-260</a>].</p>



	<p>infrastructure restrictions and the Applicant's limited control over timetables</p> <ul style="list-style-type: none"> <li>the proposed mitigations are inadequate to address the Scheme's impacts and (to the extent they are relied upon) have not been appropriately secured within the DCO's requirements.</li> </ul>	
Traffic and Transport	<p>3.4. Of course, the predicted transport impacts of the scheme will factor into various other assessments the scheme's environmental impacts, including air quality and noise. Therefore, to the extent that the Applicant's transport modelling and assessment is inadequate, this will have knock-on impacts on the assessments of these other matters.</p>	<p>The modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p>
Traffic and Transport	<p>3.5. CAGNE also has real concerns about the impacts which the Applicant's proposals to increase freight movements will have on local transport infrastructure and about the surface access constraints in terms of road linkages east and west of the airport.</p>	<p>Increases in freight movements have been considered as set out in Chapter 16 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and these movements are included in the strategic modelling work. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant effects are identified.</p>

Noise and Vibration	4.1. CAGNE take noise to be a fundamental issue of this project and have therefore appointed acoustic consultants to conduct an expert review the noise documentation.	Noted. GAL has not been introduced to CAGNE’s acoustic consultant, but would be happy to discuss your concerns.
Noise and Vibration	4.2. The review has identified major issues and inconsistencies within the noise documentation. The areas affected include, but are not limited to, UK aviation noise policy, assessment methodologies, baseline noise measurements, noise modelling, mitigation, and results. As such, CAGNE does not accept that the ES assessment of noise impacts is adequate and reserves the right to further comment on such inadequacy, such as within our Written Representations.	The impact of noise and vibration from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of <b>ES Chapter 14 Noise and Vibration [APP-039]</b> . The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by Noise Topic Working Group (comprising local authorities and the technical advisors) throughout preparation of the Environmental Statement.
Noise and Vibration	4.3. CAGNE has been party to the Noise Management Board (NMB) and Noise Envelope (NE) working groups. Both NMB and NE have been flawed processes, with Gatwick using these platforms as ‘tick box’ exercises only.	<p>A summary of consultation undertaken in developing the Noise Envelope is provided in Section 4 of <b>ES Appendix 14.9.7 The Noise Envelope [APP-177]</b>. This includes a summary of consultee comments on GAL’s outline of the Noise Envelope published in the Preliminary Environmental Information Report (PEIR) in September 2021.</p> <p>The Noise Envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]</b> explains</p>

		<p>that a total of 12 two-hour meetings dedicated to the Noise Envelope development were held between 26 May and 11 October 2022 between the airport and local authority, community and industry stakeholders. This appendix also included the bulk of the material presented and discussed in those meetings and exchanged through correspondence in between including:</p> <ul style="list-style-type: none"> <li>• Appendix 1 - Noise Envelope Engagement Process Terms of Reference P8-11</li> <li>• Appendix 2 - Gatwick Airport Noise Envelope Group Meetings Dates and Attendees P12-15</li> <li>• Appendix 3 – Meeting Notes P16-91</li> <li>• Appendix 4 - Themed Presentations and papers P92-231</li> <li>• Appendix 5 – Stakeholder presentations and papers P232-296</li> <li>• Appendix 6– Stakeholder Feedback Correspondence and GAL Responses P297-378.</li> </ul>
Noise and Vibration	4.4. This sits alongside our view that the NE does not offer certainty, with GAL’s proposal that noise contour limits could increase in the future [APP-177].	A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7 The Noise Envelope</b> [APP-177]. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [APP-175]

		which explains some of the options considered and the choices made.
Noise and Vibration	4.5. The ‘enhanced’ noise insulation scheme proposed by GAL is not comparable to what is considered current industry best practice, such as that proposed for Luton Airport’s current expansion proposals. GAL over-emphasise its benefits, and in some cases the proposals could even lead to properties being provided with less mitigation than is currently available. In addition, no allowance has been made for any negative impacts from FASI-S airspace changes.	<p>The proposed scheme is described in <b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a> including enlarging the area covered from around 2,000 homes to 4,300 homes, a more comprehensive package on insulation, higher sums of money offered across the range of noise levels encountered, and ventilation to allow windows to be kept closed in summer.</p> <p>The development of the Noise Insulation Scheme considered not only a review of the current Gatwick scheme but also consideration of schemes at other airports. The two noise zones proposed are based on the same noise levels as proposed in the current Luton airport development proposal with similar noise insulation packages being offered. Local Authorities have asked for further details of the scheme including how it will be implemented, and GAL is working with the Noise Topic Working Group to provide this.</p>
Noise and Vibration	4.6. Night flights are also a major concern for residents. Residents wish to see a night ban at Gatwick Airport to allow for 8 hours of undisturbed sleep as WHO recommend. The assessment of sleep awakenings undertaken by GAL does not take account of the approach adopted by other	The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The

	<p>recent UK airport applications nor does it include all relevant noise sources, leading it to incorrect conclusions. We also note the government’s ongoing consultation on this issue (of night time flights and the government’s policy in relation to them). This is in a context in which there has recently been increased understanding and appreciation of the serious health impacts of noise and light pollution (see, for example, the recent report of the House of Lords Science and Technology Committee “The neglected pollutants: the effects of artificial light and noise on human health” (July 2023) 2nd Report of Session 2022-23).</p>	<p>Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p> <p>The methodology used to assess sleep disturbance through a physiological sleep disturbance assessment to estimate the number of additional awakenings, as described in <b>ES Appendix 14.9.2: Air Noise Modelling</b> [APP-172], was suggested by the UK Health Security Agency in their comments on the PEIR (see para 7.1.1 of this appendix).</p>
<p>Noise and Vibration</p>	<p>4.7. More generally, the application noise documentation is inconsistent and important information is not portrayed transparently. Nor does it contain all the necessary information to allow a proper review. Both technical appraisal and the layperson’s reading of the documentation is impeded by layout and formatting. These factors limit the ability of any reader to identify effects and draw key conclusions from the noise assessments.</p>	<p>The impact of noise and vibration from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of <b>ES Chapter 14 Noise and Vibration</b> [APP-039]. The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by Noise Topic Working Group (comprising local authorities and the technical advisors) throughout preparation of the Environmental Statement.</p>

<p>Noise and Vibration</p>	<p>4.8. CAGNE also raise the following issues in relation to noise impacts: a. Gatwick has misled residents by detailing that there will be no new flight paths (CAP1908) from the new runway, notwithstanding that Gatwick is concurrently progressing the government's modernisation of airspace (FASIS) requesting new airspace for a dual runway operation. The fact that the applicant is being disingenuous with the truth about FASIS (having applied for a dual-runway airspace and new flight paths over new areas) must be seen as unacceptable. b. The lack of true compensation is a major issue and does not reach out to areas significantly impacted by noise currently, or take on board the fact that many homes are listed, and have secondary requirements for new insulation (for example, you can only receive insulation once). c. Light pollution of aircraft and ground operations impact residents and wildlife, yet little is mentioned of this in the application. Night flights are a major concern for residents and cause sleep deprivation with medical evidence showing the health impacts they cause. Long-haul flights (an area Gatwick seeks significant growth in to facilitate increases in freight) fly lower when laden</p>	<p>Section 4 of <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a> explains the Project does not require the routings of aircraft to or from the airport to be changed, but rather increases the numbers of flights on existing routes.</p> <p>Only departures would routinely use the northern runway (other than during maintenance of the main runway when arrivals and departures may use it as is the case now). Departures from the northern runway would fly straight ahead until they turn onto the relevant Standard Instrument Departure (SID) Route within the Noise Preferential Route generally 5 to 16 km from the end of the runway. These flight paths would be 210 metres north of the equivalent flight paths from the main runway.</p> <p>Given the close proximity between the existing and proposed runway centrelines, and the fact that the existing northern runway is already in regular (if limited) use, any noise impacts of the Project would be in areas already overflown by aircraft from Gatwick. This would therefore avoid most of the noise impacts often associated with new flight paths which are routed over areas not previously overflown.</p> <p>FASI-S is not required (nor is any other airspace change) to enable dual runway operations at Gatwick. When the likely outcome of the FASI-South airspace is known then the noise impacts of that change will be</p>
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	and, as such, increase noise impact.	assessed as part of that process. Further details of FASI-South and the approach are set out in <b>ES Chapter 6: Approach to Environmental Assessment</b> <a href="#">[APP-031]</a> .
Air Quality	5.1. The NRP will have an unacceptable impact on air quality. CAGNE has instructed air quality specialists to review the information provided on air quality in the Environmental Statement (ES). They did not have confidence in the results based on the evidence provided in the ES.	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data.</p> <p>The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
Air Quality	5.2. A number of errors in the chapter have been identified and there is concern regarding the lack of detail provided on the emissions and air quality modelling (despite the length of the chapter and its appendices). The model files need to be made available for scrutiny by	<b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and

	<p>us and other interested parties. This will enable a proper review of technical matters. Notwithstanding the limited information provided, various issues have been identified, including (by way of example only):</p> <ul style="list-style-type: none"> <li>• The dispersion model results exceed Defra’s recommended maximum error in over half the modelled zones, and no information is provided on the validation of the PM (PM10 and PM2.5) model results. As it stands there is significant uncertainty in the predicted results which is not discussed and suggests the data cannot be relied upon to form a judgement of significance.</li> <li>• The Applicant has failed to provide an assessment of ultra fine particles (UFP) in the air quality chapter. PM2.5 is not a good indicator of UFP, despite the Applicant’s claim. The former is based on mass and the latter is based on number of particles. As UFP have very little mass there is no direct correlation. It is known that both aircraft and road traffic are a source of UFP. The importance of aircraft UFP emissions is reflected in the establishment by the International Civil Aviation Organisation (ICAO) of a mandatory method for reporting</li> </ul>	<p>available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>GAL has engaged with local authority stakeholders and their appointed air quality experts through the topic working groups during the pre-application and pre-examination phase. During this engagement, efforts were made to gain agreement with local authorities on key modelling points.</p> <p>Full details of the model verification process are included in Section 3 within the <b>ES Appendix 13.6.1: Air Quality Data and Model Verification [APP-159]</b>. The verification methodology follows Defra LAQM Technical Guidance (TG22) and was agreed with local councils at the modelling methodology workshop in November 2022. The verification process considers a wide range of factors which affect model performance and the results in all zones meet the technical requirements set out in TG22.</p> <p>There is limited spatial coverage of PM10 and PM2.5 monitoring in the study area as such it would not be appropriate to adjust the model based on such limited data. In order to manage any uncertainty regarding emission factors or model performance, conservative</p>
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	<p>non-volatile UFPs for new commercial aircraft.</p> <ul style="list-style-type: none"> <li>• The ES has failed to consider the implications of the increase in NOx emissions in the context of the need to reduce emissions under UN Convention on Long-range Transboundary Air Pollution and the National Emissions Ceilings Directive, particularly in relation to the contribution of aviation.</li> </ul>	<p>assumptions have been made in the assessment such as assuming no improvement in background concentrations after 2030. As such the modelling carried out is robust and provides a realistic worst case view of potential effects from the project.</p> <p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>] section 18.8. The approach follows IEMA 2022 guidance on assessing human health effects in EIA. 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. The health assessment has been scrutinised by the UK Health Security Agency and the Department of Health and Social Care Office for Health Improvement and Disparities and they agree with the conclusion that the Project should not result in any significant adverse impact on public health.</p> <p>The emissions of NOx and PM2.5 related to the Project have been calculated using the methodology in <b>ES Appendix 13.4.1: Air Quality Assessment Methodology</b> [<a href="#">APP-</a></p>
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		<p><a href="#">158</a>]. A summary of impacts from the emissions calculated has been provided in Section 13.10 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>. The legislation sets UK wide targets hence ‘ceilings’ are not relevant to the project. The Project has taken into account the related principles of reducing emissions where feasible in the mitigation outlined in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>.</p>
Air Quality and Greenhouse Gases	<p>5.3. The Applicant has not presented any consideration of how the uptake of sustainable aviation fuels (SAFs) (government policy) will affect the assessment.</p>	<p><b>ES Chapter 16: Greenhouse Gases</b> <a href="#">(APP-041)</a> considers sustainable aviation fuel and introductions in zero emission aircraft.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has assumed no impact from the uptake of SAF to provide a conservative assessment of future impacts.</p>
Air Quality	<p>5.4. Furthermore, the assessment of the impact on members of the public using the airport, such as passengers does not appear to be carried out despite a statement that is has been considered.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of long- and short-term air quality impacts from all related sources.</p> <p>The contour maps in <b>the ES Air Quality Figures - Part 1</b> <a href="#">[APP-066]</a> show that there are no locations on-site where airport receptors relevant to the short-term objective (defined in Table 13.2.2 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>) are present. Airport receptors include airport passengers and associated facilities (e.g. hotels and offices) and employees where relevant. The assessment is in line with best practice</p>

		guidance outlined within Defra LAQM Technical Guidance (2022).
Air Quality	5.5. As with the assessment of transport impacts, the Applicant's air quality assessment feeds into other environmental assessments, including the Health and Wellbeing quantitative assessment, such that any errors or inadequacies in the assessment of air quality will infect these other assessments.	<b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data.
Air Quality	5.6. The applicant has not conducted a 'damage cost' calculation in line with the Air quality and emissions mitigation guidance for Sussex (2021).	Table 13.4.1 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> considers the Sussex Guidance. The approach taken for the ES is consistent with the principles of the Clean Air Strategy and guidance set out in the Sussex Guidance; it follows requirements for EIA and NPSs; and provides detailed commitments for suitable measures to be secured through the DCO.  Table 7.2.1 of <b>Needs Case Appendix 1 – National Economic Impact Assessment</b> <a href="#">[APP-251]</a> includes the TAG assessment identifying the air quality damage costs of the Project.
Air Quality	5.7. Defra's damage cost method (Air quality appraisal: damage cost guidance (updated March 2023)) is often used across the country to assess the impact of major development on air quality. The damage is often	Table 13.4.1 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> considers the Sussex Guidance. The approach taken for the ES is consistent with the principles of the Clean Air Strategy and guidance set out in the Sussex Guidance; it follows requirements for

	<p>used as a guide to what the applicant should spend on air quality mitigation. Both guidance documents (Defra’s Air quality appraisal guidance and the Air quality and emissions mitigation guidance for Sussex (2021)) were referred to by PINS in their scoping response.</p>	<p>EIA and NPSs; and provides detailed commitments for suitable measures to be secured through the DCO.</p> <p>Table 7.2.1 of <b>Needs Case Appendix 1 – National Economic Impact Assessment</b> [APP-251] includes the TAG assessment using Defra’s damage costs to identify the air quality costs of the Project.</p>
Air Quality	<p>5.8. Overall, the Applicant’s failure to carry out any damage cost calculation is a clear omission. CAGNE’s experts have carried out an indicative calculation, using information from the ES chapter. This method of assessment puts the damage to society caused by emissions between 2029 and 2047 at around £54 million, and maybe up to £198 million (taking the upper bound). However, the Applicant needs to carry out this calculation in order to adequately demonstrate the impacts of the scheme and inform the extent of mitigation required.</p>	<p>Table 7.2.1 of <b>Needs Case Appendix 1 – National Economic Impact Assessment</b> [APP-251] includes the TAG assessment identifying the air quality damage costs of the Project.</p> <p>The air quality assessment undertaken in <b>ES Chapter 13: Air Quality</b> [APP-038] has indicated that there are no significant effects as a result of the Project and the Project is not predicted to impact compliance with the air quality standards. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [APP-038] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
Greenhouse Gases	<p>6.1. The airport must be held responsible for the full emissions produced from both aviation and ground operations. There is no doubt that the NRP will result in a considerable increase in greenhouse gas emissions (GHGs), as well as</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed. The impact of these changes has been assessed in line</p>

	<p>non-CO2 emissions. That is evident from the Applicant’s own documentation (including the ES, Chapter 16). The question then is how “significant” the increase in these emissions are and what weight should be attributed to them in the planning balance. These are matters of planning judgment on which CAGNE reserves the right to make further submissions. Overall, CAGNE does not accept the Applicant’s approach to assessing (and discounting) the significance of the project’s climate change impacts, which it considers to be fundamentally flawed.</p>	<p>with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16 Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK’s legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
<p>Greenhouse Gases</p>	<p>6.2. The airport must be congratulated for seeking to reduce ground emissions but this does not outweigh, nor go near to addressing, the impact that such a significant increase in ground and air movements arising from the project will have on the Net Zero goals.</p>	<p>The assessment has considered the impact of individual sources of GHG emissions. The assessment has considered how these emissions will change in future - both expressed as net change from a future do-minimum scenario, and also in terms of gross emissions from the airport. Additionally, the assessment has considered these in aggregate, so as to understand as far as is practicable the net and gross emissions from the airport in the future resulting from the proposed Development.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16 Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>

		<p>GAL’s commitments set out in the <b>Carbon Action Plan [APP-091]</b> are directly consistent with the Government’s Net Zero goals.</p>
<p>Greenhouse Gases</p>	<p>6.3. The project’s climate impact must be seen within the context of a recognised climate emergency and in light of the most up-to-date scientific analysis. The IEMA guidance (2022) (which the Applicant cites to and relies on) is clear on the need for practitioners, in assessing significance of climate impacts, to evaluate the prevailing evidence at the time, including the guidance of expert bodies such as the Committee on Climate Change (CCC) on necessary policy developments and whether existing policy is insufficient or not in line with the science-based 1.5°C compatible trajectory towards net zero (see e.g. IEMA guidance pp. 24 and 27).</p>	<p>Page 24 of the IEMA Guidance does indeed reference the need for the practitioner to evaluate the prevailing guidance at the time although this footnote is in the context of the practitioner considering 'available guidance, policy and scientific evidence'. The CCC provides advice to the UK Government, but 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. 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. 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</i></p>

		<p><i>to meet the UK’s overall 2050 net zero target.”</i></p> <p>Page 27 of the IEMA Guidance also refers to policy, noting that some policy and regulation might lag behind the necessary level of GHG reductions. This is primarily noted in the guidance to ensure that appraisals of significance are not being carried out predicated on significantly out-dated guidance which is yet to be updated.</p> <p>However, this argument cannot be considered applicable to the assessment of aviation emission where the UK Government has specifically produced the Jet Zero strategy, and a subsequent 1-year update, in direct response to the recommended action received from the Climate Change Committee. It is not considered credible that the Jet Zero strategy could be considered as a policy document that is out-of-date from the perspective of an informed understanding of the scale and rate of emissions reductions required from the aviation sector to meet UK net zero targets.</p>
Greenhouse Gases	6.4. The Applicant’s ES assessment (Chapter 16) nevertheless ignores the CCC’s clear and up-to-date scientific advice that there should be no net expansion of UK airports, if the UK is to ensure aviation can achieve the required pathway for UK aviation emissions to meet the necessary targets	The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government’s target of net zero by 2050. The CCC

<p>(CCC’s Sixth Carbon Budget Advice). Most recently, in the CCC’s Progress Report to Parliament, dated June 2023, the CCC emphasised that expansion projects at UK airports were “incompatible with the UK’s Net Zero target unless aviation’s carbon-intensity is outperforming the Government’s pathway and can accommodate the additional demand” (p. 267). It clearly stated that current Government policy “is not delivering an outcome consistent with this” (p.276) and that included an assessment of the Government’s Jet Zero Strategy (JZS), which it described as “high risk” (carrying “considerable risks”), not least due to its reliance on nascent technology over the period up to the Sixth Carbon Budget (p. 267). Overall, the CCC concluded (under “policy assessment”) that – for aviation – the “required emissions reduction for the Sixth Carbon Budget period is...at significant risk” (p. 278), cautioning that no airport expansion should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control section CO2 emissions and non-CO2 effects (such a management framework has not been established).</p>	<p>publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government’s most recent response responded to the Progress Report 2022.</p> <p>The Government responded directly to the 2022 recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> <li>• <i>“197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO<sub>2</sub>e in 2050, compared to 23 MtCO<sub>2</sub>e residual emissions in the CCC’s Balanced Pathway.</i></li> <li>• <i>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</i></li> </ul>
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		<p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> <li>• <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></li> <li>• <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></li> <li>• <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></li> </ul>
Greenhouse Gases	<p>6.5. The CCC’s recent advice clearly questions the approach taken in the JZS (on which the Applicant so heavily relies to discount the significance of the NRP’s climate impacts). As with any policy relevant to planning decision-making, the weight to be given to a policy can be reduced, partly or wholly, where it has been overtaken by events. This is especially so where a</p>	<p>Please refer to the response above regarding the CCC and the UK Government Response.</p> <p>The JZS represents up to date government policy. Indeed, it is specifically kept up to date through the proactive monitoring and intervention commitments which the Government has put in place. The recent publication JZS one year on confirms</p>

	<p>policy addresses science-based matters, but those matters move on. That is what has happened to the JZS and very little weight can be placed on the JZS in addressing the NRP's climate impacts.</p>	<p>the Government's commitment to its Strategy.</p>
<p>Greenhouse Gases</p>	<p>6.6. In light of this advice, and other evidence, CAGNE disputes that the climate impacts of the project are not significant. Indeed, it is difficult to see how the Applicant can argue that the project (which will undoubtedly result in a substantial increase in GHGs) will somehow contribute to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050. CAGNE reserves the right to submit further representations as to why the JZS cannot be relied on as a carte blanche for the emissions impacts of any airport expansion project (especially in light of its "high risk" approach and reliance on the introduction of new technologies and fuels).</p>	<p>The IEMA Guidance indeed summarises its intent by explicitly setting aside questions of whether a project emits, or the scale of these emissions, to instead focus on reducing GHG relative to a comparable baseline consistent with a trajectory towards net zero by 2050. The interpretation is not a question of whether project emissions reduce from a net zero compliant trajectory, but rather that the project emissions are themselves compliant with a net zero trajectory (i.e. it could be better grammatically presented in the IEMA guidance as "<i>...whether it contributes to reducing GHG emissions, relative to a comparable baseline, consistent with a trajectory towards net zero by 2050.</i>")</p> <p>The test of significance is, therefore, alignment with the UK's net zero compatible trajectory. Within Section 6.3 of the IEMA Guidance it explicitly sets the test that "<i>a project that is compatible with the budgeted, science based 1.5°C trajectory in terms of rate of emissions reduction...has a minor adverse effect that is not significant.</i>"</p> <p>On this basis, and as set out in Section 16.9.78 to 16.9.80 of <b>ES Chapter 16 Greenhouse Gases</b> [<a href="#">APP-041</a>] it is</p>

		concluded that the assessment of aviation results in a Minor Adverse Not Significant Effect.
Greenhouse Gases	6.7. CAGNE also maintains that the increase in GHGs from the project will have a “material impact” on the ability of the Government to meet its climate change targets (including the Net Zero target in 2050) and, in any event there is no question that any climate change impacts will be a factor that weighs in the planning balance and can be of determinative weight. CAGNE reserves the right to make further representations on the Airports NPS and National Networks NPS policy, and the extent to which they are relevant to the application, including the correct interpretation of these policies as to the consideration of climate impacts.	<p>The comment is noted. The approach taken to the Appraisal of Overall Significance is presented in Paragraphs 16.9.63 to 16.9.97 of <b>ES Chapter 16 Greenhouse Gases</b> [<a href="#">APP-041</a>].</p> <p>The weight to be attached to climate change impacts in the overall planning balance is a matter for the decision maker. GAL’s view is set out in Chapter 9 of the <b>Planning Statement</b> [<a href="#">APP-245</a>]. That view takes into account GAL’s assessment that the climate change impacts of the NRP are not significant and that the Government has a committed strategy to ensure that the trajectory of aviation emissions aligns with its commitment to net zero.</p>
Greenhouse Gases	6.8. To the extent that it is relied on by the Applicant, CAGNE does not consider that the commitments made under the Carbon Action Plan and Surface Access Commitments are robust enough or that they have been sufficiently secured through the draft DCO’s requirements. Moreover, to the extent that there is any reliance (whether at the policy or project level) on carbon trading and offsetting schemes (such as CORSIA and the UK ETS),	<p>Please refer to the response provided regarding the <b>Carbon Action Plan</b> [<a href="#">APP-091</a>] to Brighton and Hove City Council above.</p> <p>Systems to reduce emissions from the aviation sector – such as ETS and CORSIA – are widely recognised as appropriate measures to mitigate impacts and are recognised as such within policy arising from UK Government (i.e. Jet Zero), by the aviation sector body (i.e. Sustainable Aviation), and by the UK’s advisors the Climate Change Committee.</p>

these are not considered to be acceptable mitigation for expansion impacts. CAGNE also disputes the Applicant's approach to non-CO2 impacts (the effects of which the ES does not attempt to quantify), which requires further assessment.

The process of quantifying emissions from aviation within the scope of the assessment makes no allowance for either ETS or CORSIA mechanisms - that is, the estimated emissions are those directly attributable to flights in total and no portion has been removed, or considered zero, on the basis that there are current market mechanisms by which the sector can reduce overall sectoral emissions. The reported emissions from aviation directly relate to estimated fuel usage for all flights departing Gatwick in the periods used for the assessment.

The assumptions within the modelling process for aviation do rely on central assumptions on efficiency, SAF, and zero emission aircraft which reflect those assumptions used within the Jet Zero High Ambition scenario.

However, ETS/CORSIA are reflected in the demand forecasting process GAL has used for the Project (as a cost that may suppress appetite to fly) and are also reflected in the Jet Zero High Ambition scenario as one of the measures that will restrain sector emissions to 19 MtCO<sub>2e</sub>.

The approach adopted on non-CO<sub>2</sub> impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in Section 16.4.12 onwards within **ES Chapter 16 Greenhouse Gases** [[APP-041](#)].

Greenhouse Gases	6.9. We adopt the Aviation Environment Federation and New Economics Foundation submissions.	Noted. Please see responses to those representations.
Socio-Economics and Economics	<p>7.1. CAGNE has real concerns over the sustainability of the NRP project, and questions the alleged socio-economic benefits relied on by GAL. As the Airport Commission found, Gatwick Airport is surrounded by areas that do not have mass unemployment. Gatwick is claiming that it will create 630 additional jobs at the airport. This would cause a lot of inward migration of workers to fill any vacancies as vacancies struggle to be filled today. The jobs being offered are also, in general, low skilled. As such, a major concern is the lack of affordable housing close to the airport and a lack of land to build any new affordable housing on (not least, water neutrality is preventing building at present in neighbouring areas), as such housing is at a premium locally and is expensive to rent or buy. This combines with a recognised lack of amenities in local areas, such as healthcare provision and schools. Gatwick's proposals to try to reduce the numbers of workers travelling by road are also not feasible, nor does Gatwick seek to ensure workers travel by public transport or provide free</p>	<p>The Assessment of Population and Housing Effects (Sections 6 and 7 of <b>Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201]</b>) contains analysis of the potential impact of the project on demand for housing. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p> <p><b>ES Chapter 17: Socio-Economics [APP-042]</b> provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services).</p>

	<p>bus services from areas where staffing will be forthcoming (for example, Croydon or coastal areas). The NRP will place an unacceptable pressure on adjacent areas in Sussex and Surrey whilst adding additional workers to the residential road system due to poor public transport links, services, and travel costs. We have concerns in this regard in relation to both operational and construction staff.</p>	<p>Transport network impacts are considered in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>].</p>
<p>Socio-Economics and Economics</p>	<p>7.2. We note that the Housing Need paper (January 2021) for the Crawley Local Plan details the issues Gatwick Airport causes and CAGNE will look to expand upon these points at the written representation stage.</p>	<p>The Assessment of Population and Housing Effects (<b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> [<a href="#">APP-201</a>] Section 6 and 7) contains analysis of the potential impact of the project on demand for housing. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>

<p>Socio-Economics and Economics</p>	<p>7.3. 7.4. Furthermore, Gatwick’s business model is leisure travel and, as such, it is hardest hit by any downturn. We, therefore, expect redundancies to be forthcoming. With automation and Gatwick’s volatility we do not believe jobs will materialise and, even if they do, they will continue to be low-cost retail/janitor, and seasonal. Brexit has not helped Gatwick in filling job vacancies for this sector. The Gatwick annual reports provide an insight to the efforts to reduce staff costs as in 2018 Gatwick reported a wage bill of full-time staff that was £41.9m, in 2019 Gatwick reported a wage bill of £201.2m, and in 2022 it has reduced further to £135.9m even with an extra 500 security staff being employed and wage increases. Gatwick is reliant upon low cost airlines and European travel.</p>	<p>The Local Economic Impact Assessment report presents estimates for the slow growth sensitivity which reflects a worst-case traffic scenario for economic impacts consistent with the main traffic forecasts (Annex 2 Slow Growth Sensitivity of <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>).</p> <p>Employment will be generated across a range of businesses and activities across the airport, not just at GAL itself.</p> <p><b>ES Appendix 4.3.1: Forecast Data Book</b> <a href="#">[APP-075]</a> presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Section 12.1 discusses the impact of automation. It states that employment growth due to the Project takes into account future efficiency gains driven by ongoing automation and new technologies.</p>
<p>Socio-Economics and Economics</p>	<p>7.5. Global warming will, and has, impacted this leisure business model of European low-cost holidays as areas experience record temperatures. When considering the future baseline is a 1 in 100-year event of 38 degrees centigrade too low? We are seeing this being regularly exceeded in recent years. It is stated that Europe is heating at twice the rate of the rest of the</p>	<p>The Local Economic Impact Assessment report presents estimates for the slow growth sensitivity which reflects a worst-case traffic scenario for economic impacts consistent with the main traffic forecasts (Annex 2 Slow Growth Sensitivity of <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>).</p>

	world and yet this is not reflected in the proposals.	
Socio-Economics and Economics	7.6. Low-cost airlines (nearly 90% the vast majority operated by EasyJet) to Europe may disappear as ticket prices have to reflect the alternative fuels (SAF mandatory by 2030 and 3-5x more expensive and hydrogen an unknown factor) and the damage flying is having on the planet.	<p>The forecasts underpinning the economic assessment of the project are based on the Government's forecasts in its Jet Zero strategy. These include assumptions about rising costs to include things like SAFs.</p> <p>The Local Economic Impact Assessment report presents estimates for the slow growth sensitivity which reflects a worst-case traffic scenario for economic impacts consistent with the main traffic forecasts (Annex 2 Slow Growth Sensitivity of <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>.</p> <p>Increased capacity and choice will provide significant benefits to the consumer. Congestion premiums that are related to capacity constraints and are reflected in air fares would decrease, leading to lower fares for passengers (<b>Needs Case</b> <a href="#">[APP-250]</a> – Section 8.10)</p>
Capacity and Operations	8. Long-haul airlines historically move to Heathrow when slots become available. We do not see Gatwick attracting quality airlines that are sustainable, the most recent additions (such as Ethiopian Airlines and TAAG Angola) at Gatwick are using older aircraft that are generally noisier and dirtier, such as the Boeing 777. In 2019 Gatwick declared that 1 in 5 passengers were long-haul. Working on this	<p>The noise modelling used in the noise assessment is based on forecasts of all aircraft expected to be operated by all airlines in the relevant future assessment years, 2029, 2032, 2038 and 2047, and provides a range of noise levels to represent the range of rates in which the fleet will transition to newer quieter types, see <b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a> and <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a></p>



	<p>basis that would make 15.2m long-haul passengers which would significantly increase freight and noise. Long-haul being a sector that will not be able to decarbonise in the foreseeable future due to the distance required to be flown and number of passengers carried as well as freight.</p>	
<p>Capacity and Operations</p>	<p>9. Other concerns and disingenuous nature of details provided by the applicant Operations of the airfield 9.1. There is a lack of detail as to how the aerodrome/ runways will operate safely and there is a lack of detail on safeguarding in the application. Safety must be paramount as rapid taxiway/s will no longer exit onto the emergency runway. Our concerns arise from the complexity of the runway set-up, the fact that planes will have to cross the new runway to reach terminals, the expected queuing of planes on new taxiways held at complex traffic light systems to reach the main and new runways. The Examining Authority must question the safety of these plans, particularly in a context where there has recently been air traffic controller staff shortages at Gatwick causing flights to be cancelled or diverted. We question whether there will be sufficient staff to operate such a</p>	<p>Safety in the London Gatwick aviation operation is the primary consideration. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section explains in more detail the concept of operation for the dual runway, how this will decongest the main runway and includes examples of where this type of system is already safely operated today. The CAA is the decision-making authority in relation to safety and regulates all UK airports to ensure they comply with relevant international and UK aviation safety standards. The CAA Statement of Common Ground sets specific aspects of the dual runway system related to safety and operation. Certification under the CAA satisfies UK aviation operational and safety requirements.</p>

	<p>complex airfield and airspace. Lack of bunds to stop noise and emissions.</p>	
<p>Capacity and Operations</p>	<p>Change in Flight Paths 9.2. We have significant concerns about the impacts of the NRP on changes to flight paths and the harm this will cause to residents affected. Having assessed the current proposals, we are concerned that a sizeable proportion of residents will be subject to low flying long-haul planes across their airspace consistently and/or no respite periods from flightpaths overhead. We also believe that the complexity of two runways, traffic light system, and the desire to fly direct routes to Europe will lead to more go arounds and additional holding.</p>	<p>The Northern Runway Project does not require airspace change to operate (see CAA airspace change proposal ACP-2019-81). London Gatwick’s current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p> <p>London Gatwick runs an air traffic management and airfield infrastructure optimisation programme, including projects such as Reduced Departure Separation, Time-Based Separation on arrival and the build of a new optimally sited Rapid Exit Taxiway (RET), targeted at enhancing resilience. The airport is also collaborating with airlines and business partners to further improve operational performance.</p> <p>These enhancements in combination with the introduction of a parallel dependent runway - which will decongest the current single runway operation - will improve the airport’s capability and resilience, and in turn is anticipated to reduce the number of go arounds.</p>

<p>Capacity and Operations</p>	<p>New Flight Paths 9.3. Gatwick Airport is seeking approval of Stage 2 of the CAA CAP1616 consultation process of the government’s modernisation of airspace (Future Airspace Strategy Implementation South). FASIS seeks to make airspace more efficient and to transform airspace to allow for growth. CAGNE has seen mapping from Gatwick which makes clear they are already designing airspace for 2 runways before planning permission has been granted. These maps show that Gatwick is, through the new designs, seeking to fly over new people. With such plans already in progress, Gatwick should be required to assess the full potential impacts of these new flight paths within the context of the NRP project and the DCO examination process.</p>	<p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81). London Gatwick’s current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways. The drivers for the Government and CAA co-sponsored UK airspace modernisation programme are set out in CAP 1711 Part 1 Airspace Modernisation Strategy 2023-2040. The UK airspace modernisation programme is not a dependency for the Northern Runway Project. However, airspace modernisation is compatible with the Northern Runway Project and will directly benefit the operation in terms of safety, capacity, efficiency, resilience and in reducing environmental impacts. The London Gatwick FASI-S project considers Northern Runway Project and non-Northern Runway Project scenarios, however, these scenarios relate to traffic and capacity rather than additional or different route options to support these two scenarios.</p>
<p>Construction</p>	<p>9.4. We have a number of concerns related to the construction of the NRP, including the highways, air quality and noise impacts of construction traffic and the loss of biodiversity, hedgerows, trees and nature corridors to provide land for construction. We are also concerned about the</p>	<p>As stated in <b>ES Appendix 5.3.2: Code of Construction Practice (CoCP) [APP-082]</b>, the Project will be constructed in an environmentally sensitive manner and will meet the requirements of relevant legislation, codes of practice and standards. The construction approach is to achieve the build-out of all the required new and altered facilities</p>

	<p>impacts of light and noise pollution from construction works on protected species such as bats, and residents.</p>	<p>with the minimum practicable disruption to the operation of the airport and highways and to limit the adverse impacts on the local community, businesses, road users and the environment as far as reasonably practicable. This will include the impact of the required works on road users, pedestrians, cyclists, and local communities in relation to traffic management, noise, vibration and pollution control.</p> <p>The CoCP sets out the environmental management system and measures that will be in place during the Project construction and ensures that best practice standards will be applied. In particular and in response to this comment, please review section 4.9 on construction lighting, section 5.4 on ecology and nature conservation measures and section 5.9 on noise and vibration measures to be put in place during the Project's construction.</p>
<p>Air Quality</p>	<p>9.5. The incinerator (CARE) emissions, smell or vermin do not seem to have been given full consideration, nor the visual and light impact of a 50m tall stack. Moving the incinerator to the north of the runways, where there is a predominant westerly wind, will blow additional emissions towards the northern pollution zone.</p>	<p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] provided an assessment of the CARE facility based on the current outline design parameters in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>]</p> <p>Odour risk would be managed following best practice waste handling procedures. Following best practice methodology to contain and reduce odour effects from the facility, no significant impacts would occur.</p> <p>Notwithstanding this, the Applicant has submitted a formal change request</p>

		[AS-124 to AS-143] to the DCO Application to remove the boilers from the replacement CARE facility and instead repurpose the replacement facility to be a waste sorting facility only (under Project Change 2).
Health and Wellbeing	9.6. More generally, we are concerned that this application inadequately considers the true impacts of the development on public health.	<b>ES Chapter 18: Health and Wellbeing</b> [APP-043] provides an assessment of the public health implications of the Project. The assessment has been undertaken in accord with the relevant guidelines and in consultation with the relevant public health stakeholders.
Planning and Policy	9.7. Gatwick Airport’s application documentation has, in effect, been misleading by implying that the second runway already exists (for example, through the title presented to PINS and subsequently used by media and local authorities). Initially, Gatwick referred to the runway as a standby/ emergency runway (which was an accurate presentation). In 2021, it then changed to referring to this runway as the northern runway: ‘bringing our northern runway into regular use’. This did not make clear to members of the public that considerable construction works would be necessary to enable the applicant to use both runways concurrently. To the extent that Gatwick’s documentation implied that both runways could already be used	<p>There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [APP-029]. The existing northern runway is used when the main runway is closed, such as in an emergency. It is, however, grossly underused, which is not appropriate when there is such large scale unmet aviation demand at Gatwick and in the UK.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> [AS-133]. The Project does not involve the construction of a new runway or complete re-building of the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5:</b></p>

	<p>together with little needed by way of construction works (and with the only real restriction being the legal agreement preventing dual use), that was fundamentally incorrect.</p>	<ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same width and length of the existing runway.</li> <li>• The repositioned northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m of widened runway. 12m however is to be lost on the southern flank of the runway, so that the result provides a runway of the same dimensions as it is today.</li> </ul> <p>Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the relevance of the policy of making best use to the Project.</p>
Noise and Vibration	<p>9.8. The letter issued by Gatwick Airport to the properties that may claim against the airport (Category 3 stakeholder map) has caused unnecessary anguish with residents.</p>	<p>The Applicant has undertaken its statutory duties to consult in line with the Planning Act 2008. Whilst CAGNE has raised this concern, the Applicant is duty bound when applying for their DCO to provide information and consultation documents to potentially affected Land Interests.</p>
Other	<p>9.9. The cost of over £4,000 for a hard copy of documents is disproportionate, as is the expectation that businesses and residents can read and understand 30,000 pages of jargon/reference. It is also not clear if spoken or braille</p>	<p>The Applicant has followed the advice of the Planning Inspectorate when preparing its DCO application as set out in <i>Advice Note Six: Preparation and Submission of Application Documents</i>. Applicants are no longer required to submit hard copies of their application documents and the</p>

	<p>versions are available (which should have been) and, as such, we believe there is a risk the applicant has discriminated. This process is simply unacceptable and appears to us to be biased in favour of the applicant.</p>	<p>Examining Authority indicates its preference is for electronic applications.</p>
Noise and Vibration	<p>Land use 9.10. We are concerned that Gatwick's noise expert (NDG /17 Steve Mitchell of Mitchel Environmental) indicates land will be required to be safeguarded for the new runway as was the case in 2015 with the now 3rd runway. Gatwick has not provided an explanation as to why land would need to be safeguard for this 2<sup>nd</sup> runway when they detail no new flight paths (CAP1908) and that it is 'existing'.</p>	<p>The comment is not fully understood. The Government safeguards land for a second runway.</p>
Planning and Policy	<p>9.11. Land outside of Gatwick's boundary is to be purchased and used for taxiways. Little has been made of this in the application nor the safeguarding of land for a third runway (master plan 2018) as in the draft Crawley plan.</p>	<p>Land outside of Gatwick Airport's boundary is not to be purchased and used for a taxiway. Proposed works associated to new or existing taxiways are described in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] and the accompanying <b>Project Description figures</b> [<a href="#">AS-135</a>].</p> <p>In respect of the safeguarded land, this application relates to the Northern Runway Project, entailing making best use of Gatwick Airport's existing second (emergency) runway.</p> <p>As set out in the <b>Planning Statement</b> [<a href="#">APP-245</a>], any decisions in respect of an additional runway to the south of</p>

		<p>the airport, would be a matter for government policy. As such, it is not a matter pertinent to the NRP or the determination of this DCO Application.</p> <p>In any event, the construction of any new runway would be subject to its own planning permission or DCO Application (as applicable), and which would be consulted upon, assessed and examined through its own rigorous planning process.</p>
Design	<p>Lack of Onsite Facilities 9.12. We do not believe the airport is of a size to deal with the predicted number of passengers. At present, there are not enough toilets or seating areas to accommodate even the current levels of passengers at peak times. Gatwick should clarify its intention to build a 3rd terminal by removing the staff car park to the northwest of the airport.</p>	<p>The Project proposes to extend both the North and South Terminal Buildings to increase passenger service capacity, comprising new departure lounge areas including additional retail, catering, seating and toilet facilities to align with projected passenger numbers. Additionally, a new remote Pier building (Pier 7) is also proposed to further increase passenger processing capacity, offering additional commercial facilities, seating, and amenities.</p> <p>These extensions and the pier building are described in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] and Volumes 3 and 4 of the <b>Design and Access Statement</b> [<a href="#">APP-253</a>, <a href="#">254</a>, <a href="#">255</a>, <a href="#">256</a> and <a href="#">257</a>]. The extent is shown on <b>Works Plans</b> [<a href="#">AS-129</a>] and the <b>Parameter Plans</b> [<a href="#">AS-131</a>], namely Works No. 6 for the proposed pier and Works Nos. 22 and 23 for the terminal extensions.</p>
Water Environment	<p>9.13. Sewage overflow, lack of funding for new sewage plant,</p>	<p><b>Flood Risk</b></p>



and flooding are major concerns, as is the removal of biodiversity, green spaces, and the diverting of the River Mole through pipes; the River Mole leads sewage to the River Arun which is significant due to the water neutrality issues. In relation to the River Mole, there is a particular concern over flooding, given that the river and its tributaries have previously flooded, especially when the Airport and sewage treatment plans discharge water in extreme events (and there is a real risk that climate change will make such extreme events more frequent and severe). There is no overall biodiversity plan only pockets of detail in isolation. The time scale from the removal of nature to its replacements is far too great to ensure nature continues to flourish during the construction (2024 removal-2029/30 replanting).

GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The Environment Agency reviewed and accepted the updated baseline model that has informed **ES Appendix 11.9.6: Flood Risk Assessment** [\[AS-078\]](#) in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.

The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of **ES Chapter 11: Water Environment** [\[APP-036\]](#).

As part of the NRP an approximately 300m stretch of the River Mole downstream (north) of the runways will be renaturalised that will introduce a two-stage channel that will provide additional flood storage capacity and

		<p>biodiversity benefits, similar to the stretch immediately downstream of this location to the north-west of the airport.</p> <p><b>Wastewater</b> Modelling of the wastewater sewer system undertaken to inform the ES Chapter 11: Water Environment [APP-036] demonstrates that with mitigation measures included in the NRP (see Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>]) the Gatwick wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development and they would recoup their costs through infrastructure charges to Gatwick.</p>
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Other	9.14. We adopt the Sussex Wildlife Trust submission.	Noted. A responses to Sussex Wildlife Trust’s relevant representations are contained within this report.
Other	9.15. More generally, the Examining Authority must scrutinise the overall costs and benefits of the NPR to the whole of society. On 31st March 2019 Gatwick declared profits of £810.8m with 46.6m passengers. The proposal now is for 101,000 extra flights (capped at 386,000) and growing to 76/80m passengers a year. This would estimate a profit return to Gatwick Airport of £1322m (£1.3bn) whereas New Economics Foundation state that Gatwick expansion will cost £9.1bn by 2050 to the planet.	<p>The Applicant has undertaken a cost-benefit analysis which is set out in Section 8.10 of the <b>Needs Case</b> [APP-250]. This includes consideration of the following effects:</p> <ul style="list-style-type: none"> <li>• User Benefits (passenger, airlines and GAL itself)</li> <li>• Government Revenues</li> <li>• Wider Economic Impacts</li> <li>• Environmental Costs (including carbon)</li> <li>• Scheme Costs</li> </ul> <p>The economic cost-benefit analysis shows that the scheme’s benefits significantly outweigh its costs (including environmental and carbon costs) with a Net Present Value (NPV) of around £21bn. In addition, there would be significant non-monetised effects, including employment and trade-related effects.</p>

### 3.25 Cuckfield Parish Council

3.25.1 Table 3.25.1 below sets out the Applicant’s response to the issues raised within the RR from Cuckfield Parish Council [RR-0943], including signposting to the relevant sections of the DCO Application.

**Table 3.25.1 Applicant’s response to the matters raised by Cuckfield Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration	Cuckfield village is impacted by a regular stream of criss-crossing aircraft. It is just outside of the formal take-off and landing paths to the	Cuckfield village is 15km south of the airport and not under aircraft departure routes. Section 4 of <b>ES Chapter 14 Noise and Vibration</b> [APP-039] explains the Project does not require

	<p>south of the airport, and planes are a few thousand feet up at this stage. However, the noise impacts are still significant. We are aware that these could be reduced as a result of the flight path review being undertaken currently by the government, and we would urge the airport to vigorously pursue this.</p>	<p>the routings of aircraft to or from the airport to be changed, but rather increases the numbers of flights on existing routes.</p> <p>FASI-S is a separate activity that is reviewing flight paths, and not required (nor is any other airspace change) to enable dual runway operations at Gatwick. When the likely outcome of the FASI-South airspace is known then the noise impacts of that change will be assessed as part of that process. Further details of FASI-South and the approach are set out in <b>ES Chapter 6: Approach to Environmental Assessment</b> <a href="#">[APP-031]</a>.</p>
<p>Socio-Economics</p>	<p>We recognise that the airport is a major local employer, but this has led to significant pressure for additional housing in Mid Sussex and an annual completions target which has doubled in the last ten years. Further expansion of the airport will only increase this, with the continuing urbanisation of the District and degradation of local services, transport and environment.</p>	<p>The Assessment of Population and Housing Effects (<b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> Section 6 and 7) contains analysis of impacts on housing. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable</p>

		<p>housing demands beyond what is already emerging or being planned for.</p> <p><b>ES Chapter 17: Socio-Economics</b> [APP-042] provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services).</p>
General - Opposition	To that end, Cuckfield Parish Council is not in favour of increasing flight capacity beyond its current status.	Noted.

### 3.26 Dormandsland Parish Council

3.26.1 Table 3.26.1 below sets out the Applicant's response to the issues raised within the RR from Dormandsland Parish Council [RR-1214], including signposting to the relevant sections of the DCO Application.

**Table 3.26.1 Applicant's response to the matters raised by Dormandsland Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
Noise and Vibration	The village of Dormandsland is a small rural settlement and the whole population of the parish is less than 2,000 (2021 Census). Whilst nearby Lingfield is more directly located under flight paths of incoming aircraft, accessing the Instrument Landing System (ILS), until 2014, most arriving aircraft for Gatwick approached in a swathe to the north of the village. Since then, changes in the swathes for the approaches has meant the parish area, including the High Weald part, is more	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [APP-039]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield

	<p>widely overflowed by approaching aircraft and many are turning to line up with the ILS over our parish area. This adds to the burden of increased noise with planes banking and applying braking mechanisms to slow down (both flaps and undercarriage), increasing the exposure to increased aircraft noise. The steady increase in the number of flights, including the troublesome night flights, which Gatwick appears to have more than a fair share of, has made the “totality” of the noise of aircraft a significant environmental disturbance. Any significant increase in this number by allowing a new second runway, is going to make the position of the residents, in an open and very rural part of the countryside much worse. There are no large industries or major roads transecting the parish which would create increased ambient noise levels. It is a very open rural area.</p>	<p>Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>
<p>Noise and Vibration</p>	<p>The noise is much worse for easterly departures as the planes are vectored quickly so many residents of the parish live or work under the noise of planes turning and ascending at full throttle,</p>	<p>Noise impacts at St Piers School &amp; College (also known as Young Epilepsy) have been assessed and reported in <b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a> as one of 21 schools, given reference 23. Noise increases are predicted to be less than</p>

	<p>including the students at St Piers School &amp; College (also known as Young Epilepsy), who have a range of learning, behavioural and/or physical disabilities. Their site was established at the end of the Nineteenth Century, to provide a peaceful and tranquil place for people with epilepsy and other conditions to flourish and thrive in the countryside away from London. It now is blighted by aircraft noise, which is only going to get worse if the numbers of flights continue to increase as proposed.</p>	<p>Leq 16 1dB and not significant. However, the Project includes a Schools Insulation Scheme, see <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [<a href="#">APP-180</a>], for schools where aircraft noise is affecting teaching and is increased by the Project.</p>
Noise and Vibration	<p>Spreading the passenger load into the night is also unacceptable. Gatwick already is allowed to have more night movements than Heathrow and these are over open and quiet countryside; any increase in night flights or bumping up the “shoulder” periods will add to the noise pollution, not just for Dormansland but for all the surrounding areas.</p>	<p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p>
Traffic and Transport	<p>The Parish Council also consider the increase in surface traffic which will result</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the</p>

	<p>from increasing passenger numbers, and whilst it is going to have a severely detrimental impact on the wider community, it will affect our own residents, who will suffer delays to their travel to work and to the local secondary schools in East Grinstead. East Grinstead already suffers congestion whenever the M23 is backed up which adds to the huge volume of traffic, because of the huge housebuilding programme being delivered by West Sussex.</p>	<p>Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>). Based on the modelling work, the Project is not expected to result in significant adverse impacts which requires mitigation additional to the highway works already proposed. The strategic transport modelling takes into account committed developments in the future baseline. Chapter 9 in the <b>Transport Assessment Annex B - Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a> sets out the approach which is in keeping with DfT Transport Appraisal Guidance Unit M4 which forms the basis for industry good practice. Committed major developments in West Sussex are therefore taken into account in the future baseline and with Project scenarios.</p>
Traffic and Transport	<p>The additional passengers will have to access the airport by car as the train line through Gatwick is already overstretched and can't take any more carriages.</p>	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no mitigation is required.</p>
Agricultural Land and Recreation & Greenhouse Gases	<p>The loss of open green land for car parking is unacceptable environmentally – especially as the loss of carbon capturing vegetation is to support the increase in CO2 emitting aircraft, which really is at odds with the</p>	<p>The Project results in the removal of some habitat areas, and conversely with the creation of new habitat areas. The approach to BNG adopted within the Project is set out in <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a>. <a href="#">APP-136</a>. As noted within this document this results</p>



	<p>Government’s intention to be net zero.</p>	<p>in a positive Biodiversity Net Gain for the Project.</p> <p>Section 7 of <b>ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions</b> [<a href="#">APP-191</a>] provides an assessment of the impacts of these removals/additions and concludes that the net impact is small and not considered to be material to the overall assessment of GHG emissions. Section 7 of <b>ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions</b> [<a href="#">APP-191</a>] provides an assessment of the impacts of these removals/additions and concludes that the net impact is small and not considered to be material to the overall assessment of GHG emissions.</p> <p>The impact of the Northern Runway Project on agricultural land is assessed in <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>].</p> <p>The areas of car parking proposed are identified on Figure 5.2.1b of the <b>ES Project Description Figures</b> [<a href="#">AS-135</a>]. There would be no provision of car parking on agricultural land or existing area of open space. The proposal to implement car parking on Pentagon Field which was assessed as part of the PEIR no longer forms part of the Project.</p>
<p>Air Quality &amp; Greenhouse Gases</p>	<p>The surface traffic for the increased passenger numbers, support staff, freight and supplies will add</p>	<p>An assessment of changes to air quality and greenhouse gases due to the Proposed Development is provided in <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-</a></p>

	<p>to the air pollution that is generated by the aircraft, providing an unhealthy mix of Nitrous Dioxide and Fine Particulates, as well as all the additional CO<sub>2</sub>, at a time when we are trying to reduce our country's carbon footprint. Staffing will be an issue.</p>	<p><a href="#">038</a>] and <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>].</p> <p>The air quality assessment has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The increase in emissions from a range of GHG sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed. The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
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		<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>Socio-Economics</p>	<p>The surrounding areas does not have significant unemployment. Any workers on the lower pay scales won't be able to afford the local housing costs, and there is a significant shortage of "affordable" and social rented properties. Dormansland specifically, and Tandridge generally, has an acute shortage of affordable housing, with a council waiting list of nearly 2,000 families. These new workers will therefore need to be bussed in - which is already happening - baggage handlers and hospitality/retail staff are often on Zero Hours contracts and can't afford to live locally. Even a pilot for Easy Jet is earning less than £23,000 a year - too little to get a mortgage on properties locally. The average price of houses in Dormansland starts at £550,000 (from Zoopla 2023). Gatwick has already achieved a significant amount of growth over the last 15 years, through increasing the number of flights, new airlines using the airport and the</p>	<p>The Assessment of Population and Housing Effects (Sections 6 and 7 of <b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a>) contains analysis of potential impacts on housing. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>

	mechanisation of many processes, to increase passenger through-put.	
Noise and Vibration	Dormansland is already receiving increased noise and night-time disturbance	See responses above.
Need and Forecasting	Increasing the number of flights to up to 75 per hour is unacceptable. It should be noted that this growth has taken place through permitted development and without any mitigation provided for the local communities which are negatively impacted.	<p>The DCO forecasts are based on an assumed maximum declared capacity of 69 air transport movements (ATMs) per hour.</p> <p>Whilst Gatwick is not constrained by limits on its ATM or passenger numbers, the application documents show that Gatwick has worked to seek continued improvements in sustainability – for example, through its Decade of Change initiatives, through the measures agreed with Crawley Borough Council through a series of voluntary section 106 agreements and through its Noise Action Plan.</p>
Planning and Policy	The proposal to move the existing "northern" runway 12 metres to the north to allow safe departures all through the day, is not making best use of existing runways. It is the building of a completely new runway in a different location, with the consequence of having to relocate significant amounts of built form to other parts of their site, including the air traffic control tower and the fire station. It is going to build over vast swathes of open	<p>There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [<a href="#">APP-029</a>]. The existing northern runway is used when the main runway is closed, such as in an emergency.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>]. The Project does not entail the construction of a new runway or complete re-building of</p>

	<p>countryside for additional parking spaces, all of which adds harm to the local biodiversity and importantly adds additional run-off to the local drainage network.</p>	<p>the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5</b>:</p> <ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same width and length of the existing runway.</li> <li>• The altered northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m width of new runway.</li> </ul> <p>Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the relevance of the policy of making best use to the Project.</p>
<p>Planning and Policy</p>	<p>Government policy was also to have the additional runway capacity at Heathrow</p>	<p>The application of planning policy for the Project is set out in the <b>Planning Statement</b> <a href="#">[APP-245]</a>. Most notably, Section 8.2 of the Planning Statement explains makes clear that whilst the Airport National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it does not in any way exclude Gatwick Airport from the policy encouragement to intensity its use and capacity. Paragraph 1.39 of the ANPS states that <i>“the Government has confirmed that it is supportive of</i></p>

		<p><i>airports beyond Heathrow making best use of their existing runways.”</i></p> <p>As such, no conflict arises between the ANPS and the NRP.</p>
Planning and Policy	<p>There is nothing we have seen anywhere in the application materials, that provides any evidence that the so-called economic benefits will outweigh the huge harms to the residents under the flight paths, the people using and living near the congested roads, the local and wider environment and CO<sub>2</sub> emissions for Britain.</p>	<p>Section 9 of the <b>Planning Statement [APP-245]</b> contains the overall planning balance for the Project.</p>
Water Environment	<p>The area floods very frequently and along with the local water and power supply which is inadequate to support the existing airport capacity, there will be more power cuts and floods, including foul water and sewage.</p>	<p>Gatwick Airport is currently at risk of flooding from local watercourses such as the River Mole and Gatwick Stream as reported in Section 5 of <b>ES Appendix 11.9.6: Flood Risk Assessment [AS-078]</b>. However, through provision of the mitigation measures listed in Table 11.8.1 of <b>ES Chapter 11: Water Environment [APP-036]</b> the NRP will not increase existing levels of fluvial (river) or surface water drainage flood risk for its lifetime including the predicted impact of climate change.</p> <p>The <b>Flood Risk Assessment Annex 6 - Flood Resilience Statement [APP-149]</b> demonstrates how GAL would respond to a flood event to</p>

		ensure the safety of its passengers and staff.
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### 3.27 Eastern Airways UK

3.27.1 Table 3.17.1 below sets out the Applicant's response to the issues raised within the RR from Eastern Airways UK [[RR-1255](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.27.1 Applicant's response to the matters raised by Eastern Airways UK**

Topic	Matter raised in the RRs	The Applicant's response
Capacity and Operations	London Gatwick / LGW, as the UK's second largest Airport hub is now so congested and operating at high risk on a single runway that UK regional connections such as Newquay are becoming not only unviable by virtue of attaining and retaining runway slots, but also the pricing structure is prohibitive to regional aircraft operating. The essential domestic regional feed provides London / capital hub connections with good ground transport infrastructure that is essential to the economic prosperity of such regions.	The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for domestic and global connectivity. Demand for slots at London Gatwick continues to be oversubscribed. The Northern Runway Project will allow the release of new slot capacity which will facilitate take up by existing and additional carriers and enable airlines to reinforce existing routes and launch new destinations in new markets.
Capacity and Operations	The prohibitive position due the single runway means only larger airframes are becoming viable which is also resulting in destination replication with other London hubs dominated by budget carriers and non-UK	The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased runway capacity.  The consequences of the current capacity constraints across the London

	<p>operators. This is weakening London both as a connection and a destination, already resulting in a capacity reduction around the UK and increasing likelihood of options such as Newquay Cornwall being forced out of Gatwick.</p>	<p>airports are recognised as damaging to the UK through a lack of opportunity for domestic and global connectivity. Demand for slots at London Gatwick continues to be oversubscribed. The Northern Runway Project will allow the release of new slot capacity which will facilitate take up by existing and additional carriers and enable airlines to launch new destinations in new markets.</p>
Capacity and Operations	<p>Given such a route is a part publicly supported PSO, this will only add further subsidy pressures and support to keep Newquay Airport open and a London service operable year-round. a second runway even with operating time restrictions in the same format as Manchester, or a shorter regional service runway up to Airbus A319 size so lower impact and shorter so smaller footprint are suitable options.</p>	<p>As above.</p>
Capacity and Operations	<p>Gatwick is following the same format as Heathrow ten years ago where multiple regional connections were lost due each landing or take off slot being of such a value only a larger airframe could sustain the costs. If Covid and Brexit have taught us nothing, the value of regional connectivity should have become increasingly valued. We as Eastern Airways support the</p>	<p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for domestic and global connectivity. Demand for slots at London Gatwick continues to be oversubscribed. The Northern Runway Project will allow the release of new slot capacity which will</p>



	additional capacity plans at Gatwick.	facilitate take up by existing and additional carriers and enable airlines to launch new destinations in new markets.
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### 3.28 easyJet

3.28.1 Table 3.28.1 below sets out the Applicant’s response to the issues raised within the RR from easyJet [\[RR-1256\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.28.1 Applicant’s response to the matters raised by easyJet**

Topic	Matter raised in the RRs	The Applicant’s response
General	Gatwick Airport Northern Runway DCO application – easyJet’s submission easyJet carries 46% of the traffic through London Gatwick (LGW) and as a result easyJet’s passengers will be most impacted by Gatwick Airport Limited’s (GAL) Northern Runway proposal. easyJet’s view is that GAL is not best placed to deliver the Northern Runway Project and that airspace modernisation needs to be urgently addressed before this project goes ahead.	Noted. London Gatwick operates the world’s most efficient single runway and despite the constraints that currently hamper on time performance (OTP) London Gatwick delivers good and reliable service to its customers. By way of evidence, demand for slots at London Gatwick continues to be oversubscribed.  London Gatwick agrees that airspace modernisation is needed and is pursuing its own airspace modernisation project under the Government and CAA co-sponsored UK airspace modernisation programme. Airspace modernisation is distinct from, but compatible with, the Northern Runway Project and will directly benefit the operation in terms of safety, capacity, efficiency, resilience and in reducing environmental impacts.
Capacity and Operations	1. GAL is not best placed to deliver an increase in capacity at LGW given	London Gatwick operates the world’s most efficient single runway and has historically delivered good and reliable

	<p>current performance. GAL's performance is below the performance of other large airports in Europe. GAL is consistently ranked in the lower half of punctuality rating in relation to average arrival and departures of the 33 airports reported by Eurocontrol (see sources). GAL has provided sub-standard Air Traffic Control services in 2022 and 2023 demonstrating a clear inability to cope with the current levels of traffic, let alone an increase in capacity with a second runway. GAL failed to notify airlines of any issues in advance of this summer resulting in significant disruption to passengers. Whilst GAL are making plans to improve ATC services, we are yet to see any material improvement and these issues have been persistent for the last two years. easyJet therefore questions whether GAL would be in a position to manage the increased aircraft movements that the Northern Runway would bring.</p>	<p>service to its customers. D The constraints that currently hamper on time performance (OTP) London are temporary and there is working plan with all the stakeholders involved to deliver a good Summer 24. The NRP will only help to increase resiliency and lead to better operational performance. Gatwick</p> <p>Even despite recent challenges, London Gatwick continues to be demanded by a variety of carriers as is demonstrated by the over subscription of slots. Gatwick works with its airlines and their contracted parties to lead the community on improving their inputs to their on time performance. Punctuality is an output of predominantly airline managed inputs including but not limited to the airline contracted ground handlers service delivery to turn the aircraft, the timelines of the airline calling ready to go and the integrity of the airlines schedule.</p> <p>Gatwick transitioned to NATS as their air traffic control provider in October 2022, Gatwick has been working with NATS to expedite training and competence of Air Traffic Controllers to avoid the legacy controller shortfall of teh previous incumbent. The delivery of this plan has been a great success and the continued pipeline of talent in Air Traffic Control is supported by Gatwick.</p> <p>London Gatwick runs an air traffic management and airfield infrastructure</p>
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		<p>optimisation programme, including projects such as Reduced Departure Separation, Time-Based Separation on arrival and the build of a new optimally sited Rapid Exit Taxiway (RET), targeted at enhancing resilience. The airport is also collaborating with airlines and business partners to further improve operational performance.</p> <p>These enhancements in combination with the introduction of a parallel dependant runway - which will decongest the current single runway operation - will improve the airport's capability and resilience, in turn reducing the potential for airport induced delay.</p> <p>Whilst London Gatwick strives to achieve and improve airport efficiency and capacity our airline customers schedules have also been impacted by delay at times of high traffic demand across the network due to events and limitations that are not attributable to the airport.</p> <p>These factors primarily relate to the airspace constraints across Europe, this is a particularly acute issue for many of the Gatwick airlines which service destinations across southern Europe. Eurocontrol and its Network Manager, responsible for air traffic management across Europe, have a rolling programme of initiatives to address network deficiencies, and these have, and continue to, resolve or mitigate design constraints.</p>
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		<p>Constraints in the London Terminal Manoeuvring Area airspace are also a factor, the outdated design and sectorisation of which causes periodic air traffic flow problems today. While the Northern Runway Project will not rely upon the deployment of airspace modernisation (the Future Airspace Strategy Implementation - South) this project will deliver airspace benefits that will directly address the constraints in today's airspace and therefore further enable airport capability and resilience.</p>
<p>Capacity and Operations</p>	<p>2. Current infrastructure plans set out by GAL do not sufficiently account for increased capacity. The independent slot coordinator Airport Coordination Limited (ACL) has demonstrated that current critical infrastructure at LGW (including the North Terminal departure facility) is full or close to full during the morning peak hours. This makes it impossible to add more aircraft or up gauge to larger aircraft with more seats. easyJet is aware that GAL has initiated some conversations on improvements to terminal infrastructure needed for the Northern Runway Project, however these are at a concept / pre-planning stage. They are not included in GAL's capital investment plan</p>	<p>Proposed infrastructure and timing of delivery is included the DCO application (see <b>Design and Access Statement</b> [<a href="#">APP-253</a>, <a href="#">254</a>, <a href="#">255</a>, <a href="#">256</a> and <a href="#">257</a>] for an overview). Detailed design work would come later in the event the DCO is approved. It should be noted that an extension to the North Terminal IDL is proposed as part of the project.</p> <p>The Northern Runway Project is privately funded in its entirety. For more detail, please refer to the <b>Funding Statement</b> [<a href="#">APP-009</a>].</p>

and were not submitted as part of the DCO process. easyJet is concerned that GAL has not shared any details relating to the plans, design, or scope of infrastructure needed to support the Northern Runway nor has it provided any timing for delivery or details regarding funding for supporting infrastructure. Without proper planning, operations at LGW will suffer. GAL suggests that the Northern Runway project “offers an affordable, sustainable opportunity to add significant capacity and resilience to the constrained London system and allow Gatwick to serve as many as 75 million passengers by 2038”. However, there is no mechanism within the current commitments framework for any required adjustment to be made to GAL’s investment commitment in the event that the Northern Runway project is permitted to proceed and the airport’s capacity (i.e. number of passengers served) increases. GAL has not explained how the proposed investment commitment would serve the needs of an increased number of passengers. Nor has GAL outlined how it will meet its service standards in

	having to commit expenditure to the Northern Runway, if approved.	
Capacity and Operations	<p>3. UK airspace modernisation needs to be completed before airspace above London takes on additional traffic. Airspace constraints need to be addressed prior to opening a second runway. Failure to modernise the airspace coupled with increased traffic over London will result in delays for passengers, increased operating costs, and excessive fuel burn creating a sharp spike in emissions in the South East region. NATS has forecast that by 2030 passengers could face delays on average of 30 minutes on every 1 in 3 flights if no action is taken to modernise the UK airspace (see sources). This would be further exacerbated by additional capacity added through the Northern Runway if this problem is not addressed.</p>	<p>London Gatwick agrees that airspace modernisation is needed and is pursuing its own airspace modernisation project under the Government and CAA co-sponsored UK airspace modernisation programme. Airspace modernisation is distinct from, but compatible with, the Northern Runway Project and will directly benefit the operation in terms of safety, capacity, efficiency, resilience and in reducing environmental impacts.</p> <p>However, airspace modernisation is not a prerequisite for the Northern Runway project. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick and sets out the case in the supporting data (also see the <b>Capacity and Operations Summary Paper Appendix: Airfield Capacity Study</b> (Doc Ref. 10.7)).</p>
Capacity and Operations	<p>4. GAL's current operations at LGW require significant review if GAL are to successfully support a second runway. LGW's current operations have several underperforming elements which are struggling at current levels of traffic and would be exacerbated by</p>	<p>London Gatwick is rolling out NGSC across all of its Central Search Areas (CSA's), which will support the passenger throughput and speed in which a passenger is processed in. Along with the CSA's, there are a number of updated algorithm changes that will be implemented across external and fixed airport posts which will also speed up the natural</p>

	<p>increased traffic from a Northern Runway. These are:</p> <ul style="list-style-type: none"> <li>• Security: currently there is no capacity to expand on the current security infrastructure within LGW and no increase in security resources at peak times leading to long queues and delays. Whilst there is a mandated change of security protocol (next gen security), it is unclear how this will impact on current passenger throughput. Not having to remove liquids should improve passenger flow, but the additional passenger screening requirements are expected to counter any improvement gains. easyJet is not aware of any contingency that can be deployed should GAL need to expand the capacity of security areas beyond the current planned footprints.</li> <li>• Immigration: immigration is full at certain times in both terminals. This is driven by UKBF and there is no clear plan</li> </ul>	<p>throughput that any 3rd parties and airlines will be processed in.</p> <p>Although not yet mandated, once all CSA's have implemented the new NGSC technology, the DfT will then set timelines for all external and fixed airport posts, which will give the same level of throughput as with our CSA's. The DCO is proposing additional infrastructure to accommodate the airport's expansion. Proposed infrastructure and timing of delivery is included the DCO application (see <b>Design and Access Statement</b> [<a href="#">APP-253</a>, <a href="#">254</a>, <a href="#">255</a>, <a href="#">256</a> and <a href="#">257</a>] for an overview). Detailed design work would come later in the event the DCO is approved.</p> <p>Gatwick has a close and constructive working relationship with UKBF. This includes the sharing forecasts weeks before the operating day to best align resource planning activity (that UKBF conduct themselves). On top of that, we meet strategically every month to review any operational challenges and upcoming improvement initiatives – for example the trial and acceptance of e-gate usage for 10yr olds and above. These projects all aim to enhance capacity and passenger service in the immigration hall. Our passenger operations team, work with the UKBF teams in the area to optimise passenger flow and minimise any queuing in real time. We will continue to work closely with UKBF head office in any trials or innovation that could assist in this critical arrival process.</p>
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	<p>on how UKBF will support a significant increase in passenger numbers, nor if the current terminal infrastructure could accommodate further e-gates or immigration desks.</p> <ul style="list-style-type: none"> <li>• Stand capacity: aircraft stand and coaching gate capacity are at maximums during certain times of the day. Delivery of pier service levels in line with GAL targets is only made possible by an extensive programme of aircraft towing during first wave operations. It is not understood how GAL would mitigate against further ground delays as a result of more aircraft than stands/gates available. Only an extensive programme of taxiway work to improve airfield flow could mitigate this and we do not see this in GAL's proposal.</li> <li>• Night Movements: are relied on by carriers that operate at LGW. Further traffic that increases congestion are likely to cause</li> </ul>	<p><b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a> describes the new/re-provided stands proposed as well as the airfield works and reconfiguration of taxiways. See 5.3.56 onwards, and 5.3.58 onwards of <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a>.</p> <p>Gatwick has shared with its airlines the plan to split its Air Traffic Control Ground Operation in 2025 to further enhance the performance and utilisation of the ground infrastructure.</p> <p>To address current constraints and enhance performance, London Gatwick has implemented an air traffic management and airfield infrastructure optimisation program. This includes initiatives such as Reduced Departure Separation, Time-Based Separation on arrival, and the construction of a new optimally sited Rapid Exit Taxiway (RET) to improve resilience. Collaboration with airlines and business partners is also ongoing to further enhance operational efficiency. Gatwick plans to bring the existing northern runway into routine use are a crucial component of our plans to further improve our operational performance. If approved, the plans would decongest the existing single runway operation, significantly improving the airport's capacity and resilience. By doing so, GAL anticipates a reduction in airport-induced delays, contributing to an overall improvement in operational</p>
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	<p>delay that further compound the night movement limitations with cancellations and disruption to passengers a likely risk.</p> <ul style="list-style-type: none"> <li>•</li> </ul>	<p>performance and avoidance of night movements stated as a risk.</p>
<p>Other</p>	<p>5. The source of funding for the Northern Runway has not been made clear. GAL has not provided any details as to how the Northern Runway and any supporting infrastructure will be funded. easyJet is concerned that GAL may seek to acquire the capital required for the Northern Runway from current operating airlines. Potential impact on current operators and increased charges to customers should be considered. easyJet would prefer to understand how GAL intend to fund the project before it is approved. If GAL's intent is to pass through all or a sizeable portion of costs sunk in developing the Northern Runway and associated infrastructure to airlines, this may unfairly impact current customers as it will undoubtedly influence pricing of flights touching LGW.</p>	<p>Gatwick Airport is privately owned and no taxpayer money would be used to finance this Project. The Project would be financed through a blend of debt, equity and airport charges.</p> <p>Further detail of Project costs and funding is set out in Section 3.2 of the <b>Funding Statement</b> [<a href="#">APP-009</a>].</p> <p>Current projections indicate that, even with the significant investment associated with the development, Gatwick Airport charges would remain highly competitive when compared to other London and European airports.</p>

### 3.29 Ebernoe Parish Council

3.29.1 Table 3.29.1 below sets out the Applicant’s response to the issues raised within the RR from Ebernoe Parish Council [[RR-1257](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.29.1 Applicant’s response to the matters raised by Ebernoe Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
General - Opposition	I write on behalf of Ebernoe Parish Council to make a formal objection to the plans for a second runway at Gatwick Airport.	Noted.
Noise and Vibration	This will result in an increase in passenger and cargo flights leading to more aircraft noise especially at night.	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [<a href="#">APP-039</a>]. Gatwick would continue to operate within the current government night restrictions at the airport.</p> <p>Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>

Greenhouse Gases	A second runway will produce a significant amount of carbon and greenhouse gases at a time when Parliament is committed to their reduction.	The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.
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### 3.30 Edenbridge Town Council

3.30.1 Table 3.30.1 below sets out the Applicant's response to the issues raised within the RR from Edenbridge Town Council [RR-1261], including signposting to the relevant sections of the DCO Application.

**Table 3.30.1 Applicant's response to the matters raised by Edenbridge Town Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
Noise and Vibration & Traffic and Transport	Town Councillors would like the opportunity to comment on expansion proposals, including increased aircraft movements, noise and traffic concerns	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and</b>

		<p><b>Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>On traffic, strategic transport modelling has been undertaken for the region, as set out in Chapters 12 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant effects are identified.</p>
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### 3.31 Emirates Airlines

3.31.1 Table 3.31.1 below sets out the Applicant’s response to the issues raised within the RR from Emirates Airlines [\[RR-1350\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.31.1 Applicant’s response to the matters raised by Emirates Airlines**

Topic	Matter raised in the RRs	The Applicant’s response
Capacity and Operations	How will GAL ensure that the infrastructure from check in area, baggage belt, transports and staff car park will be available to support the additional capacity that they will bring. This must be done in conjunction with this project and not afterwards.	Proposed infrastructure and timing of delivery is included the DCO application (see <b>Design and Access Statement</b> <a href="#">[APP-253, 254, 255, 256 and 257]</a> for an overview). Detailed design work would come later in the event the DCO is approved. GAL has an inherent interest in ensuring coordinated delivery of all aspects of the project.

	How will this project impact the local traffic?	
Traffic and Transport	How will this project impact the local traffic?	Strategic transport modelling has been undertaken for the region, as set out in Chapter 12 of the <b>Transport Assessment</b> [AS-079]. The strategic modelling work has informed the microsimulation VISSIM modelling, undertaken for the roads around the airport. This is set out in Chapter 13 of the <b>Transport Assessment</b> [AS-079] and a detailed technical report is contained in <b>Transport Assessment Annex C – VISSIM Forecasting Report</b> [APP-261]. Overall, the future baseline scenarios indicate that without the Project, the network around the airport would begin to operate close to capacity in several locations. The inclusion of the highway works as part of the Project prevents unacceptable highway conditions arising once the Project is in place.

### 3.32 Frant Parish Council

3.32.1 Table 3.32.1 below sets out the Applicant’s response to the issues raised within the RR from Frant Parish Council [RR-1442], including signposting to the relevant sections of the DCO Application.

**Table 3.32.1 Applicant’s response to the matters raised by Frant Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
General - Opposition	Frant Parish Council object to the proposed plans to expand the facilities at Gatwick Airport ('the Airport').	Noted.

<p>Landscape, Townscape and Visual</p>	<p>The Parish is already significantly and adversely affected by being in proximity to the flight path and, as above, wishes to object, on the following grounds. The Parish of Frant is under the flight path and is already seriously affected by the relentless stream of flights overhead. This is exacerbated by the frequency, stacking and flying altitudes of overhead aircraft.</p>	<p>Section 8.9 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] includes a thorough assessment of effects on the perception of tranquillity within nationally designated landscapes as a result of an increase in the number of visible and/or audible overflying aircraft up to 7,000 ft above local ground level. The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of <b>ES Landscape, Townscape and Visual Resources Figures – Part 3</b> [<a href="#">APP-062</a>] together with nationally designated landscapes and 10 popular and well-known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive dominant qualities.</p>
<p>Noise and Vibration &amp;</p>	<p>Further, there is no moratorium on flights</p>	<p>The aircraft noise assessment assumes the Night Restrictions</p>

<p>Health and Wellbeing</p>	<p>overnight, as there is at Heathrow Airport. Local residents are thus subjected to noise from aircraft 24 hours a day. Upon attending meetings and exhibitions arranged by Gatwick, our councillors have been told they must have ‘sensitive hearing’ and should ‘shut their windows’ – this is clearly an unacceptable response to a serious problem encountered by our local residents, amongst them the young, vulnerable, elderly and infirm. The Council is aware of WHO research which indicates that noise is an underestimated threat that can cause a number of short- and long-term health problems. These include sleep disturbance, cardiovascular impacts, poorer work and school performance amongst children and teenagers, impaired hearing, etc.</p> <p>Noise has emerged as a leading environmental nuisance in Europe and the public now complains about excessive noise more often. Indeed, complaints to the Airport from residents of nearby Royal Tunbridge Wells have risen dramatically, even within the last year.</p>	<p>imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p> <p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> sets out the noise assessment for the Project. Section 18.8 ‘Health and Wellbeing Effects from Changes to Noise Exposure’ of <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> considers the population health implication of the changes due to the Project. The health assessment references and has regard to the WHO noise guidelines, as well as other scientific research on the health effects of noise. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders.</p>
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<p>Health and Wellbeing</p>	<p>The Council considers the health and well-being of local residents to be a key priority and this WHO research is thus very telling. With 80,000 extra flights planned annually within 10 years, further expansion at the Airport would obviously result in more noise and emissions.</p>	<p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> sets out the noise assessment for the Project. Section 18.8 'Health and Wellbeing Effects from Changes to Noise Exposure' of <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> considers the population health implication of the changes due to the Project. The assessment has had regard to the various measures within the scheme that control and limit noise exposures. The health assessment concludes the noise changes would not give rise to a significant public health effect. It is acknowledged there is a residual minor adverse effect and that many people are sensitive to aviation noise. Significant beneficial effects of the Project are also noted, including linked to employment opportunities targeted to vulnerable groups.</p>
<p>Noise and Vibration</p>	<p>Although the Council acknowledges that some aircraft are getting quieter, this is a slow process and any benefits of this advance in aviation technology could be offset by the expansion in the number and frequency of flights.</p>	<p>Please see above for GAL's response with regards noise from night flights.</p> <p>The impact of increases in aircraft noise from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>.</p> <p>Many interested parties note that aircraft noise bothers them most in the summer, when aircraft numbers are greatest. The assessment of aircraft noise focuses on an average summer day in order to assess the season on highest noise in accordance with CAA</p>



		<p>guidance. During the year of greatest noise impact the Project is forecast to add 19% to the summer season air traffic during the 16 hour day period from 0700 to 2300. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>
<p>Noise and Vibration</p>	<p>In addition, as the frequency of flights increases, planes will likely fly further toward the east, affecting the Parish and its environs to a greater extent. It is understood, too, that with advances in navigation precision, greater concentration of aircraft can now occur, resulting inevitably in noise being more concentrated above the location beneath.</p>	<p>Section 4 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> explains the Project does not require the routings of aircraft to or from the airport to be changed, but rather increases the numbers of flights on existing routes.</p>
<p>Noise and Vibration</p>	<p>In addition, there is concern about what will happen when there are delays. It is likely that these delays will have knock-on consequences for flights overnight - already a serious problem between 9pm to 12am. This would be</p>	<p>Delays are not expected to increase with the additional capacity provided by the Northern Runway.</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits for the</p>

	<p>particularly evident during the summer months when air traffic movements (ATMs) intensify. The increase in intensity of use to 60 ATMs an hour and for that peak capacity to be spread throughout the day will bring increased concentration of flights over an extended period making the situation worse for the residents on the ground. Some of the worst noise emitters are the summer budget airline flights that land throughout the night and have older engines so that you can hear the back thrust as they start to descend. Increasing the already burdensome and significant noise pollution our residents suffer would be intolerable. It is noted that the Masterplan does not contain any proposals for how this problem would be addressed. It is already an issue that should be at the forefront. If any growth at the Airport were to take place, it should be matched by a directly proportionate reduction in noise, emissions and other local and more widespread impacts.</p>	<p>day and night, and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p>
<p>Air Quality &amp; Noise and Vibration</p>	<p>Also of serious concern to the Council of any expansion would be the inevitable environmental impact on our</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport</p>

	<p>very sensitive area. This includes the important designation within the Parish of an Area of Outstanding Natural Beauty (AONB) - a status which warrants protection from the noise and pollution impacts of air (and other) traffic.</p>	<p>sources) in East Sussex following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs is assessed in <b>ES Chapter 8 Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive, dominant qualities.</p>
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<p>Ecology and Nature Conservation</p>	<p>Such pollution will continue to affect local wildlife and biodiversity and the Council is aware of the ongoing concern about the serious affects of nitrogen dioxide levels on nearby Ashdown Forest, which is now known to be damaging its foliage and reducing plant growth. These lowland woods and scrublands are a natural a habitat for breeding birds.</p>	<p>Potential impacts to Ashdown Forest SPA/SAC were fully assessed as part of <b>ES Appendix 9.9.1 Habitats Regulations Assessment Report</b> [<a href="#">APP-134</a> and <a href="#">APP-135</a>]. This concluded there would be no adverse effect on the integrity of Ashdown Forest. This conclusion has been agreed with Natural England in their Relevant Representation [<a href="#">RR-3223</a>].</p>
<p>Ecology and Nature Conservation</p>	<p>Excessive noise impacts the birds' instinct to settle in these areas as they cannot hear other birdcalls.</p>	<p>The impacts of noise disturbance on ecology receptors has been assessed in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] of the Environmental Statement. No adverse effects were identified.</p>
<p>Noise and Vibration</p>	<p>The Council understands that the most tangible gains have already been made in terms of reducing the noise output from aircraft and that any future gains will now be less tangible, indeed will be marginal. The Council also notes that the Airport's own research shows that there has been no material reduction in noise levels since 2010. Thus, the Council considers the only real way in which to control noise pollution is to resist expansion and resolve current issues related to frequency, stacking, altitude and so on.</p>	<p>The noise assessment models the effect of the aircraft fleet transitioning to newer, quieter models in detail, which will continue to reduce individual aircraft noise levels see <b>ES Appendix 14.9.2 Air Noise Modelling</b> [<a href="#">APP-172</a>].</p>

<p>Noise and Vibration</p>	<p>The Council is not aware that any current noise monitoring undertaken by the Airport extends as far as the Parish of Frant or its surroundings. Given the impact that aircraft noise is currently having on our local residents, properly recording this impact would be a first option. Ideally, such monitoring would be undertaken independently of the Airport and, armed with the results, local mitigation measures by the Airport could be proposed and adopted.</p>	<p>Paragraph 14.4.19 of the <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> lists 23 Noise and Track Keeping Monitors that were in place in April 2019. In January 2024 this had increased to 29 at Alfold, Bellwood, Charlwood, Chiddingstone, Cowden, Crowborough, Dunsfold, Fordcombe, Hever Castle, Ifold, Kingsfold, Lingfield Race Course, Moat House, Newdigate, Northchapel, Oaklands Farm, Orltons, Outwood, Penshurst Place, Petworth, Ruckmans, Rusper, Russ Hill, Rusthall, Sidlow, Slinfold, South Holmwood, Wadhurst, Withyham. The closest of these to Frant village are at Wadhurst 4km to the south and Withyham 7km to the West. Some monitors are permanent, some are for temporary projects. Frant is approximately 30km from the airport. Priorities for noise monitoring are considered by the Noise and Track Keeping Monitoring Advisory Group (NATMAG) comprising Gatwick, the DfT, NATS, air traffic control, airlines, and local authorities, who meet quarterly.</p>
<p>Greenhouse Gases</p>	<p>As well as the Airport itself operating as carbon neutral, the carbon emissions of aircraft clearly need to be reduced and the pollution and congestion associated with additional passengers and staff travelling to and from the airport properly monitored and mitigated. To operate in accordance with Government policy, the Airport must first</p>	<p>The carbon/GHG impacts arising from the existing runway fall within the remit of the Jet Zero framework. It is clear that the Government has committed to monitoring and managing aviation and other GHG emissions trajectories – i.e. there is a process in place for that purpose.</p>

	ensure that environment impacts arising from the use of the existing runway are properly considered and mitigated against.	
Traffic and Transport	It is widely acknowledged that the current surface access to the Airport is poor and unsustainable. There is already considerable pressure on the local and major road networks and the rail networks are inadequate in terms of capacity, frequency and connectivity. Expansion would serve only to exacerbate this without robust change, funded by the Airport.	<p>A comprehensive assessment has been undertaken for rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users.</p> <p>Extensive modelling work has been undertaken to assess the performance of the highway network. Strategic modelling is set out in Chapter 12 and microsimulation VISSIM modelling is set out in Chapter 13 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. Based on the strategic and microsimulation modelling assessments, together with the proposed highway improvement works, the Project is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation additional to the highway works already proposed.</p>
Traffic and Transport	The Council does not consider that the Surface Access Strategy addresses adequately the very real	<p>Please see above response.</p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> sets out the commitments which GAL is making to</p>

	<p>prospect of serious further pressure on the local transport network in this region.</p>	<p>achieving certain mode shares and delivering interventions and measures to support those mode shares.</p>
Capacity and Operations	<p>The Council considers that the Airport should first address the serious impacts resulting from its operation now, before considering expansion with very little justification for doing so, particularly given that it is Heathrow Airport that has been identified for growth.</p>	<p>Gatwick has pursued comprehensive initiatives to limit the impact of the existing airport operations on the surrounding community – for example through its Decade of Change and Noise Action Plan; and through the initiatives contained in its 2022 Section 106 agreement with Crawley Borough Council and West Sussex County Council.</p> <p>The <b>Planning Statement</b> [<a href="#">APP-245</a>] sets out the policy justification for growth at Gatwick. The application is also accompanied by a <b>Needs Case</b> [<a href="#">APP-250</a>] to show the benefits of the airport’s expansion.</p>
Capacity and Operations	<p>Instead of expansion, the Airport should invest in measures, examples of which might include ensuring stacking occurs off shore so that planes only enter our skies when there is an immediate landing option, emulating the pre-2013 flight path, swathe and distribution, implementing Continuous Descent Approaches resulting in higher flying altitudes and speeding up the modification of aircraft to reduce noise so that benefits can be redeemed as soon</p>	<p>London Gatwick agrees that airspace modernisation is needed and is pursuing its own airspace modernisation project under the Government and CAA co-sponsored UK airspace modernisation programme. Airspace modernisation is distinct from, but compatible with, the Northern Runway Project and will directly benefit the operation in terms of safety, capacity, efficiency, resilience and in reducing environmental impacts.</p> <p>If the modification of aircraft refers to the Fuel Over Pressure Protector (FOPP) unmodified A320 Airbus family of aircraft, the London Gatwick</p>

	<p>as possible by people on the ground.</p>	<p>charging scheme that came into effect from 1 January 2018 that applied to all to arriving at the airport was in place throughout last year and as of the end of 2023, the percentage of retrofitted A320 family aircraft operating during the year was 99.9%.</p>
<p>General</p>	<p>The Airport's presumption in favour of growth should, in order to be fair, be compared with a 'do nothing' option.</p>	<p><b>ES Chapter 6: Approach to Environmental Assessment</b> [<a href="#">APP-031</a>] sets out the approach taken to the Environmental Impact Assessment (EIA), to identify and evaluate the likely significant effects associated with the Project.</p> <p>The existing and likely future environmental conditions in the absence of the Project (the 'do nothing' option) are known as 'baseline conditions'. It is a reality that the airport operations will continue to grow even without consent for further infrastructure. The future baseline conditions at the Project site and within the study area form the basis of the assessment, enabling the likely significant effects to be identified through a comparison with the baseline conditions.</p> <p>Each topic chapter clearly defines its approach to the evaluation of significance and the methodology used for the EIA process against the baseline (the 'do nothing' option).</p> <p>In the absence of the NRP, passenger volumes at Gatwick Airport will continue to grow.</p>



<p>Planning and Policy</p>	<p>Liaison with community groups, the government and all other interested parties should be escalated with a resolve from all that growth – when it is justified – should only be permitted when there is proportional mitigation in place to offset any negative impacts.</p>	<p>All necessary controls and mitigation measures relied upon in the Environmental Impact Assessment to avoid, reduce and if possible offset significant impacts of the Project have been identified. The mitigation will then be translated into clear and enforceable controls; either via requirements in the DCO, obligations in a new DCO Section 106 Agreement or other consenting regimes. The mitigation measures and how they are proposed to be secured are compiled in <b>ES Appendix 5.2.3: Mitigation Route Map</b> <a href="#">[APP-078]</a>.</p>
<p>Traffic and Transport</p>	<p>There is, of course, the inevitable increase in pressure on local roads (eg around Crawley, etc), major roads such as the M25 and M23 and rail networks that would result from rising passenger numbers arriving at or leaving the airport.</p>	<p>A comprehensive assessment has been undertaken for rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users.</p> <p>Extensive modelling work has been undertaken to assess the performance of the highway network. Strategic modelling is set out in Chapter 12 and microsimulation VISSIM modelling is set out in Chapter 13 of <b>Transport Assessment</b> <a href="#">[AS-079]</a>. Based on the strategic and microsimulation modelling assessments, together with the proposed highway improvement</p>

		works, the Project is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation additional to the highway works already proposed.
Planning and Policy	The Council does not consider such expansion and utilisation of this safeguarded land is necessary or justified, particularly in light of the Airports Commission having selected Heathrow for a new runway. Given this, it is unacceptable that this land has been withheld from the possibility of other forms of development since 2006, a period of some 15 years. If the Airport is seriously concerned about generating local economic prosperity, the current area safeguarded for future expansion at Gatwick should be released and put to more locally and regionally advantageous use and allow local residents to move on from the constant threat of airport expansion and all that this would entail.	This application relates to the NRP and does not relate to the expansion or utilisation of safeguarded land, which is a matter for government policy.
Socio-Economics and Economics	It is not a tenable position to suggest that an expansion of the Airport would result in direct employment (and thus economic) benefits locally. The local area around the Airport is not an employment area and nor are areas like	The economic benefits are clustered around the airport. Table A4.2 of <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> sets out the employment by local authority area.

	<p>Frant Parish, which is essentially a group of villages within the AONB. Apart, perhaps, from the scenario of the odd one or two local residents who might take up employment at an expanded Gatwick, there would be no local economic benefit. Indeed, this would be a good example of where employees are actually not sourced from the airport’s immediate environs but commute in; an unsustainable position and against government policy.</p>	
<p>Socio-Economics and Economics</p>	<p>At the draft masterplan stage, it was suggested that the majority of shareholders are derived from overseas; it is thus not a stretch to suggest that, in turn, the majority of economic benefits could be felt outside of the UK but at the expense of serious environmental impacts on local communities.</p>	<p>The Applicant has undertaken a cost-benefit analysis which is set out in Section 8.10 of the <b>Needs Case</b> <a href="#">[APP-250]</a>. This includes consideration of the following effects:</p> <ul style="list-style-type: none"> <li>• User Benefits (passenger, airlines and GAL itself)</li> <li>• Government Revenues</li> <li>• Wider Economic Impacts</li> <li>• Environmental Costs (including carbon)</li> <li>• Scheme Costs</li> </ul> <p>The economic cost-benefit analysis shows that the scheme’s benefits significantly outweigh its costs (including environmental and carbon costs) with a Net Present Value (NPV) of around £21bn. In addition, there would be significant non-monetised effects, including employment and trade-related effects.</p>

### 3.33 Forestry Commission

3.33.1 Table 3.33.1 below sets out the Applicant's response to the issues raised within the RR from the Forestry Commission [[RR-1426](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.33.1 Applicant's response to the matters raised by the Forestry Commission**

Topic	Matter raised in the RRs	The Applicant's response
Consultation	As part of this, we wish to ensure that our consultation response on 29th November 2021 has been incorporated into the project's design.	Section 1.20 of <b>Annex B</b> of the <b>Consultation Report</b> [ <a href="#">APP-220</a> ] summarises the comments made in the Forestry Commission's response to the Autumn 2021 Consultation, with changes made in response to the consultation responses received set out in Section 5.10 of the <b>Consultation Report</b> [ <a href="#">APP-218</a> ].
Ecology and Nature Conservation	Given the scale of development and potential for direct and indirect ecological impact (including the development footprint and as a result of increased air and road traffic), we ask that the project exhausts all efforts to avoid impacts and to maximise opportunities for habitat creation or enhancement.	The Project includes extensive new habitat creation and enhancement that has led to an overall net gain of circa 20% ( <b>ES Appendix 9.9.2 Biodiversity Net Gain Statement</b> [ <a href="#">APP-136</a> ]).
Ecology and Nature Conservation	We ask that we are given the opportunity to work with the developer to explore how we can maximise the effectiveness of mitigation, compensation and any net gains in biodiversity.	Noted.
Ecology and Nature Conservation	As part of this, we would like to see similar measures made for Heathrow mitigation	The submitted application commits to a range of mitigation measures. Amongst these, Gatwick has submitted

<p>&amp; Socio-Economics</p>	<p>which included installing the woodfuelled CHP system to heat, cool and power T2/T5 and therefore provide a significant local market for timber production, which has various knock on benefits to the local economy and sustainable management of woodland.</p>	<p>a <b>Carbon Action Plan</b> [<a href="#">APP-091</a>] which identifies a range of initiatives from which Gatwick will draw in order to meet stretching carbon targets.</p>
<p>Ecology and Nature Conservation</p>	<p>We also ask that as the proposal represents development adjacent to Ancient Woodland, the project should not only ensure no loss or deterioration but should seek to secure significant gains in the form of woodland condition enhancement, expansion, greater connectivity between habitats, bringing into management and/or enhancing the buffer zone itself. This should help to safeguard the future condition and extent of ancient woodland. Without this, this could be at best a missed opportunity to enhance/bolster these special habitats, and at worst could result in permanent impacts. This principle is supported by the Environment Act 2021 including the requirement for Biodiversity Net Gain and Local Nature Recovery Strategies which should</p>	<p>No areas of ancient woodland have been included within the Order Limits. Existing areas of ancient woodland at the Gatwick estate (which have been excluded from the Order Limits) are already subject to ongoing management by the GAL environment team and, as such, no further enhancement was considered possible. The inclusion of habitat enhancements within the Project, in particular along the southern side of the airport, will help connectivity between Horleyland Wood in the east and Brockley Wood in the west. The Project includes extensive new habitat creation and enhancement that has led to an overall net gain of circa 20% (<b>ES Appendix 9.9.2 Biodiversity Net Gain Statement</b> [<a href="#">APP-136APP-136</a>])</p>

	<p>prioritise protecting and enhancing existing habitat value as far as possible as a first priority.</p>	
<p>Ecology and Nature Conservation</p>	<p>It is also worth noting that the 15m buffer referenced in the Standing Advice for Ancient Woodland, Ancient Trees and Veteran Trees, is a minimum and may need to be larger to account for any direct or indirect impacts associated with the proposed developments.</p> <p>Summary of our November 2021 response is copied below for reference: We are pleased to note that the plans have taken into account the value of ancient woodland, and are respecting the minimum 15 metre buffer zone advised in our joint Standing Advice with Natural England on development affecting ancient woodland. We take note of the commitment to use dust suppression techniques to avoid impact on the woodlands. We ask that any further comments Natural England make on the effects of dust, noise and air pollution effects on ancient woodland are considered, and consider a larger buffer zone around ancient woodland which is likely to be</p>	<p>A minimum of 15m buffer has been incorporated into the Project to protect ancient woodland (as per government guidelines), as set out in the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>.</p>

	most impacted by these effects,	
Ecology and Nature Conservation	<p>We also note the recognition that replacement of the loss of broadleaved woodland with replanting is a long-term plan, and that in the interim there will be a loss of habitat. In addition to the on-site replacement planting, we would suggest compensatory (off-site if needs be) woodland to be created in advance of works starting to help reduce the long-term impact of woodland loss. All tree stock should be UK-grown where possible to reduce the carbon footprint of supply, and also to prevent importation of pests and diseases via imported stock. Vigorous biosecurity should be enforced throughout, from the robust use and checking of plant passports, to on-site biosecurity methods.</p>	<p>The options for any advance planting that may be possible of some habitats are currently being investigated.</p> <p>The need for biosecurity in the landscape scheme for the Project is set out in Section 10.21 of <b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">APP-113</a>, <a href="#">114</a>, <a href="#">115</a> and <a href="#">116</a>].</p>
Design	<p>Where possible, we would strongly recommend a commitment to the use of timber in the construction of appropriate buildings, such as hotels. Timber used in buildings locks away carbon, and is a sustainable, renewable construction material. We would expect to see a further commitment to all timber used to be certified under the Forest Stewardship</p>	<p>Specific building materials will be determined as part of the detailed design stage.</p> <p>Volume 5 of the <b>Design and Access Statement</b> [<a href="#">APP-257</a>] includes a design guide and design principles of which the detailed design is to take into account. The development of the design guide and design principles takes into account Gatwick Airport's sustainability commitments, however no commitment has been made to</p>

	<p>Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), or similar recognised scheme. Page 2 Timber certified by Grown in Britain would also demonstrate a commitment to both sustainability and UK employment, through the reduced production and transport footprints which arise from using UK-grown timber, as opposed to that imported from elsewhere, and supporting the UK forestry industry.</p>	<p>specifically require the use of any material in the buildings.</p>
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### 3.34 Freebird Airlines

3.34.1 Table 3.34.1 below sets out the Applicant's response to the issues raised within the RR from Freebird Airlines [[RR-1449](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.34.1 Applicant's response to the matters raised by Freebird Airlines**

Topic	Matter raised in the RRs	The Applicant's response
General - Support	It allows improvements to our airfield, terminal facilities and access arrangements into the airport.	Noted. The Applicant welcomes Freebird Airlines' support for the Project.

### 3.35 Gatwick Airport Consultative Committee (GATCOM)

3.35.1 Table 3.35.1 below sets out the Applicant's response to the issues raised within the RR from GATCOM [[RR-1494](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.35.1 Applicant's response to the matters raised by GATCOM**

Topic	Matter raised in the RRs	The Applicant's response
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<p>Traffic and Transport</p>	<p>Surface Access Many of the proposed mitigation measures are to be delivered after the Northern Runway opens. GATCOM is concerned that communities may suffer the negative impacts of growth before the mitigation measures, such as highways improvements works and improvements to walking and cycling infrastructure, are delivered.</p>	<p>Strategic modelling has been undertaken for the assessment years of 2029, 2032 and 2047. More detailed microsimulation VISSIM modelling of the roads around the airport has been undertaken for the assessment years of 2032 and 2047, with and without Project. As set out in Chapter 13 of the <b>Transport Assessment</b> [<a href="#">AS-079AS-079</a>], the highway modelling indicates that the highway network would continue to operate satisfactorily until the assessment year of 2032, taken as the third anniversary of dual runway operations commencing. <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076AS-076</a>] assesses the effects of the Project in both 2029 and 2032 and concludes that in 2029, prior to completion of the highway works, there would be no significant adverse effects and no mitigation is required. The completion of the highway works by 2032 prevents unacceptable highway conditions arising beyond that date with the Project is in place.</p>
<p>Traffic and Transport</p>	<p>In respect of promoting active travel, many GATCOM members believe more could be done to bring forward active travel improvements as part of the Northern Runway project.</p>	<p>The Project includes surface access improvements, as summarised in Section 2.2 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] which are programmed to be complete within three years of dual runway operations.</p> <p>The proposed active travel provision has been developed with due consideration of schemes identified in the Reigate and Banstead Local Cycle and Walking Infrastructure Plans (LCWIP) and Crawley LCWIP. The proposals which form part of the</p>

		<p>Project complement those in the LCWIPs and deliver a number of them.</p> <p>The active travel proposals include physical improvements to infrastructure at Longbridge roundabout, alongside the A23 London Road and Longbridge Way, between South Terminal, Gatwick Airport railway station and Balcombe Road and alongside Perimeter Road North between North and South Terminals.</p> <p>The scope and scale of the proposed active travel improvements will support achieving the modal shift outlined in Chapter 14 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>.</p>
<p>Traffic and Transport</p>	<p>GATCOM thinks that the mode share targets are considered to be ambitious and there appears to be insufficient evidence to demonstrate how the target mode share percentages for staff and passengers can be met. The behavioural choices by passengers and airport staff are still uncertain following the COVID-19 pandemic and industrial action on the railways. GATCOM believes that the predictability of mode share needs further examination to test the modelling and assessment of the impacts of airport expansion in a range of scenarios, which should reflect the recent trends and</p>	<p>The mode share commitments within the <b>Environmental Statement - Appendix 5.4.1 Surface Access Commitments (SAC)</b> <a href="#">[APP-090]</a> represent the position GAL is committing to achieve, informed by modelling of mode choice and transport network operation. The interventions proposed in the SAC have been included in the modelling, which provides confidence that the mode share commitments can be achieved with those interventions in place.</p> <p>The Examining Authority has made a Procedural Decision dated 24 October 2023 <a href="#">[PD-006]</a> to request the Applicant to account for COVID-19 in the transport modelling. A full submission response is due to be submitted at the end of January 2024.</p>

	<p>latest forecasts in use of and shift to public transport and sustainable surface access modes. Specifically, the consequences for local communities of lower mode share transfer to sustainable sources should be further examined and additional mitigations proposed if appropriate.</p>	
Traffic and Transport	<p>GATCOM has mixed views about the level of car parking provision. Of key importance to GATCOM is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or rail) and that the airport is incentivised to take all reasonable steps to encourage and facilitate sustainable transport modes.</p>	<p>GAL recognises the balance that needs to be struck. Car parking charges are used as a mechanism to discourage travelling to the airport by car and to make the sustainable travel modes more attractive. There are commitments in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> to GAL using car parking and forecourt charges to influence air passenger travel choices. GAL regularly reviews parking charges in the context of changing demand at different times of year and of its commitment to promoting sustainable transport.</p>
Traffic and Transport	<p>There continues to be a need to address the problem of approaching traffic from the surrounding road network in Surrey, West Sussex, East Sussex and Kent. Pre-pandemic, the local road network, including country lanes, was already being commonly used to access the airport with traffic volumes</p>	<p>Strategic modelling has been undertaken for the region, as set out in Chapters 12 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a> and a detailed technical report is included in <b>Transport Assessment Annex B - Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a>. The strategic modelling shows that the additional traffic demand associated with the Project, taking into account the</p>

	exacerbated when there is disruption and congestion on the M25 and M23.	highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant impacts are identified.
Traffic and Transport	As part of GATCOM's response to the draft Airport Master Plan the A22, A264, A24 and the possibility of a Crawley western link road were highlighted as potential routes needing improvement where financial contributions to local authorities towards improvements may be needed.	Based on the strategic modelling work undertaken, the Project is not expected to result in significant adverse environmental effects or operational impacts which require mitigation additional to the highway works already proposed.
Traffic and Transport	Most GATCOM members feel strongly that local road improvements need to manage the increased traffic levels should be funded by GAL or Central Government and not a burden on the local Council Tax.	As above, the modelling work shows no further mitigation work is required for the Project.
Traffic and Transport	We are aware that GAL has discussed the possibilities of direct rail services to Kent with Network Rail but that such services would not be considered to come forward as part of the assessment, which is disappointing.	<p>A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The prospect of direct rail services to Kent is not sufficiently certain and therefore are not included in the assessment (as per the guidance in TAG Unit M4).</p> <p>The full set of rail data is included in <b>ES Appendix 12.9.2 Rail Passenger Flows</b> <a href="#">[APP-154]</a>. The assessment for the Project shows that there is no significant adverse impact on rail</p>

		<p>services which requires mitigation or additional connectivity by rail to Kent.</p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> contains commitments to provide funding support for new or enhanced regional or express bus or coach routes, which include routes between Gatwick and Kent.</p> <p>GAL will continue to work with Network Rail and Train Operators on potential future improvements.</p>
Traffic and Transport	<p>GATCOM does welcome that GAL has identified enhancements to the regional coach network to target areas that currently have a low public transport mode share but generate significant numbers of trips to and from the airport. These areas include: Sevenoaks and the Medway Towns, East Grinstead and Uckfield, Tunbridge Wells, Horsham and Worthing, Bexley and outer east London.</p>	<p>This is noted.</p>
Capacity and Operations	<p>GATCOM questions why GAL is not committed to limiting the simultaneous use of the northern runway for the full 8 hour night period 23:00 – 0700. Whilst the airline representatives view the period 06:00 to 07:00 as important to maintain the resilience and efficiency of route networks, GATCOM</p>	<p>As highlighted in the representation the matter of night restrictions sits with Government, a consultation on which is expected this year. As explained to GATCOM by airline representatives, the period 06:00 to 07:00 is important to maintain the resilience and efficiency of airline schedules.</p> <p>Nevertheless, the Northern Runway Project proposal includes specific</p>

	<p>reiterates the comments made in its response to previous consultations that there should be no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00 as well as giving a commitment to not to operate the Northern Runway during the night period 23.00 – 07.00 except when the main runway is non-operational. GATCOMs Airline representatives do not support this view, but some other GATCOM members are seeking further reductions in night noise. However, GATCOM does understand this is an issue for the secretary of state as Gatwick is a designated airport.</p>	<p>further mitigation measures to reduce night noise, including not operating the Northern Runway routinely between 23:00 and 06:00 hours.</p>
<p>Noise and Vibration</p>	<p>Noise Envelope GATCOM acknowledges that some members continue to express serious concerns about GAL’s engagement mechanism for the Noise Envelope and that it did not follow the process set out in CAP1129. As a result, GATCOM previously highlighted the need for the frequency of overflight to also be taken into account in the Noise Envelope. .</p>	<p>A summary of consultation undertaken in developing the Noise Envelope is provided in Section 4 of <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>]. This includes a summary of consultee comments on GAL’s outline of the Noise Envelope published in the Preliminary Environmental Information Report (PEIR) in September 2021.</p> <p>The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>] explains that a total of 12 two-hour meetings dedicated to the Noise Envelope</p>

		<p>development were held between 26 May and 11 October 2022 between the airport and local authority, community and industry stakeholders. This appendix also included the bulk of the material presented and discussed in those meetings and exchanged through correspondence in between including:</p> <ul style="list-style-type: none"> <li>• Appendix 1 - Noise Envelope Engagement Process Terms of Reference P8-11</li> <li>• Appendix 2 - Gatwick Airport Noise Envelope Group Meetings Dates and Attendees P12-15</li> <li>• Appendix 3 – Meeting Notes P16-91</li> <li>• Appendix 4 - Themed Presentations and papers P92-231</li> <li>• Appendix 5 – Stakeholder presentations and papers P232-296</li> <li>• Appendix 6– Stakeholder Feedback Correspondence and GAL Responses P297-378</li> </ul> <p>The Noise Envelope includes requirements to monitoring and report two ‘number above’ metrics, N66 day and N60 night, that indicate the number of overflights above Lmax 65dB during the day and Lmax 60dB at night.</p>
Noise and Vibration	As a result, GATCOM is not persuaded that stakeholder views have been sufficiently fully reflected in the noise envelope proposals including	Please refer to our response in the row above.

	<p>in respect of metrics, limits and policy compliance. GATCOM would therefore like to see further engagement on this key issue and new proposals brought forward.</p>	
Noise and Vibration	<p>Noise GATCOM notes that no commitments have been made in respect of future levels of night flights.</p>	<p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%.</p>
Noise and Vibration	<p>Given the advice of the Planning Inspectorate to the GATCOM Secretariat that “The statutory consultation required under the Planning Act 2008 (PA2008) is not set out in guidance such as CAP 1129, however if a developer is applying this guidance to its noise assessment, it is best practice to follow that guidance unless another appropriate method is applied”, GATCOM understands that the appropriateness of GAL’s chosen engagement mechanism will be a matter for the Planning Inspectorate to consider.</p>	<p>The CAA attended some of the Noise Envelope Groups meetings and confirmed that CAP1129 is guidance, rather than a requirement. See page 38 of <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a>.</p>



<p>Noise and Vibration</p>	<p>GATCOM is pleased that GAL have stated they will consider introducing a Noise Envelope even if the DCO does not proceed and that it would form part of the next Noise Action Plan and therefore be subject to review by GATCOM via NaTMAG.</p>	<p>In this event, we will consider the introduction of a daytime Noise Envelope, in accordance with the Government policy at the time, not necessarily as part of the NAP process, but to subsequently be reported within it. We will conduct a feasibility study into the potential adoption of a daytime noise envelope cognisant that as an operating restriction this would be subject to the Airports (Noise-related Operating Restrictions) (England and Wales) Regulations 2018.</p>
<p>Noise and Vibration</p>	<p>Clarity is needed regarding regulation of a Noise Envelope and the assignment of a responsible party for such regulation. Several Local Authorities members wish to have a regulatory role in the Noise Envelope that would involve reviewing and approving submissions and would allow action to be taken in the event of a breach.</p>	<p>Section 7 of <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a> describes the process by which compliance with the Noise Envelope will be monitored including reporting to the CAA as Independent Reviewer and publishing the Annual Monitoring and Forecasting Report and action plans.</p>
<p>Noise and Vibration</p>	<p>GATCOM previously highlighted the need for the frequency of overflight to also be taken into account in the Noise Envelope. It is the frequency of overflight that is of greatest concern to local communities affected by aircraft noise. We appreciate that GAL has included a series of secondary noise metrics that consider</p>	<p>During the development of the Noise Envelope there was much debate about noise metrics, see <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a>. Section 2 of <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> <a href="#">[APP-175]</a> explains the options considered with Section 2.5 explaining the preferred option including CAP1129 guidance on the use of multiple metrics.</p>

	<p>frequency of overflight, but some GATCOM members consider that these need to form part of the quantified noise envelope itself, not merely be reported.</p>	
<p>Greenhouse Gases</p>	<p>GATCOM does have concerns about the significant increase in greenhouse gas emissions and impacts on climate change and understanding how airport expansion can be achieved in the light of national and international carbon reduction targets. GATCOM does appreciate that GAL are undertaking significant works to reduce airport emissions and as part of the Airport Carbon Accreditation process will be publishing a stakeholder plan for reducing the wider scope 3 emissions.</p>	<p>GATCOM's recognition of the work being done by GAL is appreciated.</p> <p>Regulation of emissions beyond GAL's control is a matter on which the Government has established a clear policy in line with its commitment to achieve Net Zero by 2050.</p> <p>That policy is set out in the Government's Jet Zero Strategy (the JZS). There the Government sets out how it will apply a range of market mechanisms, regulations and investments to stimulate the use of new fuels and technology to ensure that aviation emissions will reduce in line with a trajectory which is consistent with the Net Zero commitment. The Government is proactively monitoring performance against that trajectory and will intervene further if necessary to ensure its commitments are met.</p> <p>In its Response to the report of the Climate Change Committee in October 2023, the Government summarised the position as follows:</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</i></p>

		<p><i>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>
<b>Greenhouse Gases</b>	<p>Climate Change and Emissions GATCOM continues to wish to see a carbon reduction trajectory set for airport related emissions and a process by which progress can be monitored and remedial action taken in the event that reduction targets are not being met.</p>	<p>Please refer to Section 4.4 of <b>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</b>, which sets out the monitoring and governance process, including the submission of annual monitoring and the need for additional action to be taken where such monitoring indicates that insufficiently rapid progress is being made towards the CAP outcomes. The practical effect of this ensures an appropriate carbon reduction trajectory for ABAGO emissions.</p> <p>Government policy does not anticipate that a carbon budget will be set for each airport. Rather, the Government’s Jet Zero Strategy sets</p>

		out the Government’s commitment to regulate the aviation sector as a whole so that its carbon trajectory is consistent with the Government’s commitment to Net Zero.
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### 3.36 Gatwick Area Conservation Campaign (GACC)

3.36.1 Table 3.36.1 below sets out the Applicant’s response to the issues raised within the RR from GACC [[RR-1495](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.36.1 Applicant’s response to the matters raised by GACC**

Topic	Matter raised in the RRs	The Applicant’s response
General - Opposition	We strongly oppose this Gatwick Airport Ltd (Gatwick) DCO application.	Noted.
Consultation	GACC was actively involved in the DCO consultation process and Noise Envelope Consultation. GACC has registered its concern on the inadequacy of pre-application consultation.	Noted. The Project has undertaken its consultations in line with relevant guidance and statutory requirements as set out within the Consultation Report [ <a href="#">APP-218</a> ].
Need and Forecasting	The future baseline currently used for comparison in the DCO is itself a massive increase in flights and passengers. All assessments, including the EIA, should separately assess both the future impacts associated with increased use of the existing runway and with the Northern Runway, so the overall future impacts of Gatwick’s planned growth can be clearly understood.	<p>The Applicant’s approach to the assessment of environmental impacts is explained in the early chapters of the Environmental Statement. In particular, <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] describes the project, whilst <b>ES Chapter 6: Approach to Environmental Assessment</b> [<a href="#">APP-031</a>] explains the approach taken to the assessment of environmental effects.</p> <p>It is clearly material that the airport is currently uncapped in relation to both air traffic movements and passenger</p>

		<p>numbers. An important consequence is the expectation that Gatwick will continue to grow existing aircraft and passenger numbers incrementally through a combination of steady increases in aircraft size and load capacity together with growth in runway utilisation in off-peak periods.</p> <p>The assumptions and forecasts for this incremental growth are set out in the submitted <b>Needs Case</b> <a href="#">[APP-250]</a> at Section 6.3. It is estimated that Gatwick will grow to be able to serve some 67.2 mppa in 2047 – an increase of around 20 million passengers (30%) on 2019 levels. Aircraft movements are forecast to grow to approximately 326,000 commercial ATMs, reflecting an increase of around 10% compared to 2019 throughput. The submitted evidence shows that the demand exists for this incremental increase in capacity, which can be achieved without the grant of further planning permissions.</p> <p>It does follow that the net impact of the Northern Runway Project would be an increase in ATMs and passenger numbers above that which can be achieved in the future baseline. The same documents show this to be a forecast increase of c.13 mppa and c.60,000 flights per annum. The impact of that net increase is fully assessed in the submitted Environmental Statement.</p> <p>GACC express concern that this somehow masks the overall impacts of</p>
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		<p>expansion. However, the full growth of the airport is explained openly. The impact assessments properly assess the likely significant effects of the project against a future baseline that takes into account the environmental conditions created by increased use of the existing runway. For example, in relation to noise, the noise contours shown reflect the full operation of the expanded airport and the noise insulation scheme proposed by way of mitigation covers all of the airport operations, not just the increment from the NRP; and the traffic assessment also consider the total traffic anticipated to be generated at Gatwick with the NRP in place and fully operational.</p>
<p>Need and Forecasting</p>	<p>Needs Case The ANPS requires airports seeking to expand (other than Heathrow) to demonstrate sufficient need, additional to (or different from) that met by provision of a Northwest Runway at Heathrow. Gatwick has not done this. Gatwick should also assess the need for increased use of its existing runway above 2019 levels, without development of the new Northern runway. This should be contrasted with historic growth rates of flights and passengers (including allowance for Covid impacts), global economic trends, increasing awareness and need for legislation to govern</p>	<p>Substantial documentation has been submitted with the DCO application to demonstrate the need for the NRP. Notably, very few representations engage with the detail of the submitted case or with the demonstrable need to provide more capacity. Gatwick has the world’s busiest (daytime) single runway and a documented waiting list from airlines for more slots. It has a clear need for additional operational capacity and resilience <b>today</b> and all forecasts show that need will increase.</p> <p>The relevant paragraph of the ANPS for these purposes is paragraph 1.42 which provides:  <i>“As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will</i></p>

	<p>aviation’s climate impacts and changes in how international business operates. It is unlikely that any additional capacity or the Northern Runway will ever be needed.</p>	<p><i>still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application’s individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>No conflict arises with the ANPS, therefore, from seeking DCO consent for more intensive use of Gatwick Airport – in fact, the ANPS recognises that “<i>it may well be possible</i>” to make the case for such growth, although each application will have to go through the relevant process and to be considered on its merits.</p> <p>The merits of the case for the NRP are set out extensively in the application documents; notably in the <b>Planning Statement</b> [APP-245] and the <b>Needs Case</b> [APP-250], supported by <b>ES Appendix 4.3.1: Forecast Data Book</b> [APP-075].</p>
<p>Socio-Economics and Economics</p>	<p>Economy and Jobs (drawing on New Economics Foundation submission) The benefit-cost analysis should comply with latest TAG guidance.</p>	<p>The assessment of national impacts follows DfT’s TAG (at the time of submission) and assesses costs and benefits from the scheme. While this type of assessment is not required for private-sector schemes, we use TAG</p>

		<p>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>
Greenhouse Gases	<p>This includes revising the economic analysis so carbon appraisal values for traded and non-traded carbon emissions are valued equivalently and assessment of non-carbon effects included.</p>	<p>The assessment of national impacts follows DfT's TAG (at the time of submission) and assesses costs and benefits from the scheme.</p>
Planning and Policy	<p>The ANPS requires airports seeking to expand (other than Heathrow) to demonstrate sufficient need, additional to (or different from) that met by provision of a Northwest Runway at Heathrow.</p>	<p>Substantial documentation has been submitted with the DCO Application to demonstrate the need for the NRP. The representations do not engage with the detail of the submitted case or with the demonstrable need to provide more capacity. Gatwick has the world's busiest (daytime) single runway and a documented waiting list from airlines for more slots. It has a clear need for additional operational capacity and resilience <b>today</b> and all forecasts show that need will increase.</p> <p>Issues relating to the ANPS are addressed above.</p> <p>The merits of the case for the NRP are set out extensively in the application documents; notably in the <b>Planning Statement</b> [<a href="#">APP-245</a>] and the <b>Needs</b></p>



		<p><b>Case</b> <a href="#">[APP-250]</a>, supported by <b>ES Appendix 4.3.1: Forecast Data Book</b> <a href="#">[APP-075]</a>. It would not be productive to set the case out again here but there are some specific issues raised in the representations which are responded to here.</p>
<p>Noise and Vibration</p>	<p>Gatwick’s proposals do not: 1. Meet government policy (APF, 2013) that “Future growth in aviation should ensure that benefits are shared between the aviation industry and local communities ...the industry must continue to reduce and mitigate noise as airport capacity grows.” Instead, the proposals would permit noise to increase substantially and potentially indefinitely, so benefits of growth accrue almost entirely to Gatwick and its customers. The ANPS requires a ban on scheduled night flights for 6.5 hours between 23.00-07.00, and requires airports to make particular efforts to incentivise use of the quietest aircraft at night. The ANPS is stated to be important and relevant for any airport NSIP in South East England, including Gatwick. A night flight ban should be a condition of any approval of the DCO, as should provision of a comprehensive package to incentivise the use of the quietest aircraft at night outside these hours.</p>	<p>The Noise Envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> explains that a total of 12 two-hour meetings dedicated to the Noise Envelope development were held between 26 May and 11 October 2022 between the airport and local authority, community and industry stakeholders. This appendix also included the bulk of the material presented and discussed in those meetings and exchanged through correspondence in between including:</p> <ul style="list-style-type: none"> <li>• Appendix 1 - Noise Envelope Engagement Process Terms of Reference P8-11</li> <li>• Appendix 2 - Gatwick Airport Noise Envelope Group Meetings Dates and Attendees P12-15</li> <li>• Appendix 3 – Meeting Notes P16-91</li> <li>• Appendix 4 - Themed Presentations and papers P92-231</li> <li>• Appendix 5 – Stakeholder presentations and papers P232-296</li> </ul>

		<ul style="list-style-type: none"> <li>• Appendix 6– Stakeholder Feedback Correspondence and GAL Responses P297-378</li> </ul> <p>Sharing the benefits was discussed in various Noise Envelope Group (NEG) meetings. GAL presented its estimates of sharing the benefits to the NEG on 23 June 2022, see pages 164 to 175 of <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>], using the methodology referred to in the Bristol Airport Planning Appeal Decision, Appeal Ref: APP/D0121/W/20/3259234, 2 February 2022. GAL noted that the policy gives no method for assessing the degree of sharing nor the extent that should be shared, and the planning inspector for the Bristol case approved the scheme as consistent with noise policy, whilst noting that 77% of this potential noise benefit was to be taken by ATM growth.</p> <p>An annual cap of 380,000 commercial Air Transport Movements is included in the DCO that covers the winter as well as the summer when noise impacts are at their greatest.</p>
<p>Air Quality and Greenhouse Gases</p>	<p>The DCO lacks details needed to assess the impact of the ‘biomass boilers’ and air pollution from the CARE facility or on how delivering net-zero will impact buildings and infrastructure.</p>	<p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] provided an assessment of the replacement CARE facility based on the design parameters in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] as submitted.</p> <p>Notwithstanding this, the Applicant has submitted a formal change request to</p>

		<p>the DCO Application to remove the boilers from the replacement CARE facility and repurpose the replacement facility to be a waste sorting facility only (under Project Change 2).</p> <p>The range of potential measures, and the commitments made by Gatwick to address emissions reductions from buildings and infrastructure, are set out in <b>ES Appendix 5.4.2 Carbon Action Plan</b> <a href="#">[APP-091]</a>.</p>
Noise and Vibration	<p>Construction Lacks detail on: impacts of construction noise and residents' eligibility for insulation, access impacts (e.g. Woodroyd Avenue); and sequencing of construction works.</p>	<p>Construction noise levels have been predicted for 24 stages of construction at 170 locations across the airfield and highway areas, see <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[AS-039]</a> for further information. Section 9 of Chapter 14 identified 10 properties likely to require noise insulation. <b>ES Appendix 14.9.1 Construction Noise Modelling</b> <a href="#">[APP-171]</a> list the areas of construction work and the construction plant assumed in the noise modelling.</p>
Construction	<p>The Outline Construction Management Plan, Material Transport Plan and Workforce Transport Plan are insufficient to support the statement that "No significant effects are likely to occur with respect to traffic and transport during construction and operation of the Project."</p>	<p><b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a> assessed the likely significant effects on traffic and transport during the construction and operation of the Project. The assessment considered potential impacts of severance (the separation of residents from facilities), driver delay, pedestrian/ cyclist delay and amenity, accidents and safety, hazardous loads, and public transport.</p> <p>The application is supported by <b>ES Appendix 5.3.2 Annex 2 - Outline Construction Workforce Travel Plan</b></p>

		<p><a href="#">[APP-084]</a> and <b>ES Appendix 5.3.2 Annex 3 - Outline Construction Traffic Management Plan <a href="#">APP-085</a></b>. These outline plans provide a strong framework of control, which will be developed into final plans, which are to be submitted to and approved by the relevant planning authority under Requirements 12 and 13 of the <b>Draft DCO <a href="#">[AS-127]</a></b> prior to commencement of development.</p>
Socio-Economics and Economics	<p>Sensitivity analysis should set out the economic impacts of not achieving the assumptions in Jet Zero High Ambition scenario or those underpinning the Transport Decarbonisation Strategy. The analysis should include the impact of induced increases in road transport movements associated with highway investments.</p>	<p>The Local Economic Impact Assessment report (Annex 2 Slow Growth Sensitivity of <b>ES Appendix 17.9.2: Local Economic Impact Assessment <a href="#">[APP-200]</a></b>) presents estimates for the slow growth sensitivity which reflects a worst-case traffic scenario for economic impacts consistent with the main traffic forecasts.</p>
Greenhouse Gases	<p>The submission understates the increased carbon emissions and underplays its significance. This DCO would clearly have a material impact of the ability of the UK to meet its carbon reduction targets, and future carbon budgets. If expansion were permitted Gatwick alone would be responsible for over 3-5% of the UK's sixth carbon budget, with or without Jet Zero mitigations. Approval would require government to ignore the Climate Change Committee's 2023 Progress Review recommendation to not</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. The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation</i></p>

	<p>permit any airport expansion without a UK-wide capacity-management framework being in place.</p>	<p><i>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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
Greenhouse Gases	<p>Planning must consider significance of emissions from all airport expansions not just on a case-by-case basis. Significance should be assessed against the 1.5C compliance trajectory as in IEMA guidance (Assessing GHG emissions and their significance, 2022).</p>	<p>See response above.</p>
Greenhouse Gases	<p>Gatwick should assess the cumulative impact of its plans against the global 1.5°C climate limit and the UK government’s legal requirement to reach net zero by 2050.</p>	<p>It is explained within the environmental assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a comprehensive cumulative assessment of aviation emissions and</p>

		<p>that government is best placed to undertake that assessment.</p> <p>The Applicant has followed best practice guidance by contextualising emissions against the UK Carbon Budgets.</p> <p>This is explained in ES Paragraph 16.10.4 of <b>ES Chapter 16: Greenhouse Gases [APP-041]</b> by reference to the IEMA Guidance which confirms that <i>“The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.”</i></p>
Greenhouse Gases	Gatwick needs to explain how expanding one of the hardest to decarbonise sectors of the economy is consistent with the radical decarbonisation required across all sectors to meet net zero. Gatwick must explain why it believes it is acceptable to expand to 80 mppa, which is inconsistent with the Aviation Strategy: Making Best Use of Existing Runways (2018). It is not acceptable to simply assume later Jet Zero	Gatwick’s NRP proposals have been specifically taken into account by the Government in the modelling done to support the Jet Zero Strategy. In its background document ‘Jet Zero Modelling Framework’ (March 2022), the DfT set out its capacity assumptions for the UK’s airports (in Annex D). The capacity assumptions are said to take account of both the third runway at Heathrow and policies to make the best use of other airports (MBU). <sup>1</sup>

<sup>1</sup> Jet Zero: Modelling Framework, Annex D. March 2022. available at <https://assets.publishing.service.gov.uk/media/62384b518fa8f540f3202bd4/jet-zero-modelling-framework.pdf>

	<p>reductions can be achieved within climate limits.</p>	<p><i>“3.18 In June 2018, the government set out its policy support for airports to make best use of their existing runways in Beyond the Horizon: The future of UK aviation: making best use of existing runways (“MBU”) and a new runway at Heathrow Airport in the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (ANPS), subject to related economic and environmental considerations. In common with the Jet Zero Consultation the capacity assumptions in our modelling reflect and are aligned with these policies.”</i></p> <p>The modelling shows the full capacity of the NRP at 386,000 ATMs (Annex D of the Jet Zero Modelling Framework).</p>
<p>Greenhouse Gases</p>	<p>Gatwick’s submission should include the non-carbon impact of flying and overall climate impact of airport expansion (including inbound international flights which will increase emissions overseas). It is disingenuous to treat these as zero, or assume that all Jet Zero assumptions can be achieved without any evidence: both are in breach of the Precautionary Principle or IEMA guidance. The carbon emissions from additional surface transport journeys are not insignificant, and must be assessed separately against national road sector targets and policies, and Surrey and</p>	<p>The exclusion of inbound flights from the assessment is wholly consistent with the assessment framework which is contextualising against a) the UK's carbon budgets and b) the Jet Zero Strategy.</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in ES Paragraph 16.10.4 of <b>ES Chapter 16: Greenhouse</b></p>

	Sussex transport plans and climate strategies.	<b>Gases</b> <a href="#">[APP-041]</a> that references the IEMA Guidance noting that “ <i>The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.</i> ”
Greenhouse Gases	Gatwick plans to reduce embodied carbon from construction should be clearly set out, beyond the CAP’s high-level target. The CAP should include full surface access and flight emissions. Gatwick must set binding limits to constrain and reduce all these GHG emissions.	Please refer to Section 1.3 of <b>ES Appendix 5.4.2 Carbon Action Plan</b> <a href="#">[APP-091]</a> which explains the purpose of the CAP and the commitments contained therein. Separately commitments relating to surface access emissions, and the monitoring and governance processes set out for these, are contained within the <b>ES Appendix 5.4.1 Surface Access Commitments</b> <a href="#">[APP-090]</a> . These are separately secured under Requirement 20 of Schedule 2 to the <b>Draft DCO</b> <a href="#">[AS-127]</a> .
Greenhouse Gases	In conclusion, no airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control aviation sector CO2 emissions and non-CO2 effects.	Both CO <sub>2</sub> and non-CO <sub>2</sub> effects are reflected within the Jet Zero Strategy. The limitations on the quantification and assessment of effects from non-CO <sub>2</sub> emissions is widely recognised; the Jet Zero Strategy commits UK Government to keep the approach on the management of these under review, and the <b>Carbon Action Plan</b> <a href="#">[APP-091]</a> commits Gatwick to following any policy emerging from this



		<p>regime. The limitations on the quantification and assessment of effects from non-CO<sub>2</sub> emissions is widely recognised; the Jet Zero Strategy commits UK Government to keep the approach on the management of these under review, and the <b>Carbon Action Plan</b> [<a href="#">APP-091APP-091</a>] commits Gatwick to following any policy emerging from this regime.</p>
Air Quality	<p>The confidence of modelling projected for future years is severely undermined by substantial inaccuracies in modelled air quality concentrations (particularly NO<sub>x</sub>), demonstrated by the necessitated crude adjustments to align to the 2018 monitoring.</p>	<p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils.</p> <p>The baseline year of 2018 was selected based on traffic and monitoring data availability and was discussed and agreed to be used with the local authorities. This provides a reference level against which any potential changes in air quality can be assessed. Paragraph 13.5.18 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] provides full details of the selected baseline year.</p> <p>Full details of the model verification process to compare modelled predictions with real world monitoring data are included in Section 3 within <b>ES Appendix 13.6.1: Air Quality Data and Model Verification</b> [<a href="#">APP-159</a>]. The verification methodology was agreed with local councils at the</p>

		<p>modelling methodology workshop in November 2022.</p> <p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] contains details of how the future baseline has been assessed and how predicted growth has influenced the future baseline.</p> <p>A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p>
Air Quality	<p>Independent statistical review should assess the assumptions and adjustments to align the model to monitoring data. The modelling should therefore not be relied upon to claim that future impacts are not significant without: substantially increasing monitoring (frequency, locations); regular reviews of emissions inventories, assumptions; and revisions of the year-by-year air quality modelling. This must enable air quality impacts of the modelled baseline and superimposed project to be reassessed and refined.</p>	<p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils.</p> <p>Full details of the model verification process to compare modelled predictions with real world monitoring data are included in Section 3 within <b>ES Appendix 13.6.1: Air Quality Data and Model Verification</b> [<a href="#">APP-159</a>]. The verification methodology was agreed with local councils at the modelling methodology workshop in November 2022.</p> <p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] contains details of how the future baseline has been assessed and how predicted growth has influenced the future baseline.</p>

		<p>A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p>
Noise and Vibration	<p>Give communities certainty about future noise levels (APF para.3.29), because they do not contain any proposals to limit noise in the winter period, and would allow future reviews to increase noise limits.</p>	<p>The Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p> <p>An annual cap of 380,000 commercial Air Transport Movements is included in the DCO that covers the winter, as well as the summer when noise impacts are at their greatest.</p>
Noise and Vibration	<p>Incentivise airlines to introduce the quietest suitable aircraft as quickly as is reasonable. Gatwick should be required to engage properly with community groups and councils, under agreed independent chairmanship, to develop new proposals that comply with policy and guidance.</p>	<p>In September 2021 the Preliminary Environmental Information Report (PEIR) outlined the Noise Envelope proposal for the northern runway Project. The concept has been developed considerably since then, taking account of extensive stakeholder input, to form the fully implementable and enforceable set of noise limits and procedures described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is</p>

		<p>described <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [<a href="#">APP-175</a>] which explains some of the options considered and the choices made.</p> <p>The Noise Envelope noise contour area limits apply to the 8 hour night period 2300 to 0700 and the 16 hour daytime period 0700 to 2300 hours, and so for the first time place limits of community noise exposure across the whole 24 hour period. The enforceability of these limits through the DCO, if granted, gives certainty that these limits will not be exceeded so that aircraft noise will be limited and will reduce during the second noise envelope period as required by government policy.</p>
Greenhouse Gases	<p>Sensitivity analysis should set out the economic impacts of not achieving the assumptions in Jet Zero High Ambition scenario or those underpinning the Transport Decarbonisation Strategy. The analysis should include the impact of induced increases in road transport movements associated with highway investments.</p>	<p>It is not for the Applicant or for the examination of the NRP to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>
Socio-Economics and Economics	<p>The user (passenger) benefits appear overstated compared to earlier estimates by the Department of Transport (2017) and the Airports Commission, particularly the 90% of benefits estimated from business passengers.</p>	<p>The assessment of national impacts (Section 8 of the <b>Needs Case</b> [<a href="#">APP-250</a>]) follows DfT's TAG (at the time of submission) 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,</p>

		<p>GAL has used 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>Need and Forecasting</p>	<p>Gatwick assumes a significant increase in business travel, whereas CAA surveys and IAG’s statements show a reduced share of business travel post-Covid: still less than the 2006 peak. Sensitivity analysis and up-to-date aviation evidence should be provided to support the claimed uplift due to “output change in imperfectly competitive markets” as required by TAG. Analysis should distinguish how much business travel:</p> <ol style="list-style-type: none"> <li>1 Benefits to UK against non-UK residents,</li> <li>2 Is displaced from other UK airports;</li> <li>3 Is constrained (as opposed to leisure travel) in the baseline case.</li> </ol>	<p>The latest demand forecasts prepared by the Government have been used as the basis of the latest demand projections when considering the need case. These were prepared in early 2023 when the market recovery was already well underway.</p> <p>They were updated to include the latest assumption regarding economic growth, airline costs and future carbon costs/emissions. Those forecasts are discussed in the submitted <b>Needs Case</b> <a href="#">[APP-250]</a> from paragraph 5.2.16.</p> <p>Whilst the business travel market remains below 2019 levels, and will for several years, some segments e.g. leisure have bounced back and are already exceeding 2019 levels. Demand has also been restricted by operational challenges being experienced by airlines and the wider industry.</p>

		<p>Over the long-term demand is forecast to grow reflecting economic growth, growing trade links, increasing leisure demand (holidays/visiting friends &amp; relatives (VFR)).</p> <p>For example, the latest Government forecasts (Jet Zero 2023) are that demand for aviation in the UK will grow by &gt;100 million passengers by 2040 and &gt;140 million passengers by 2050.</p>
<p>Socio-Economics &amp; Economics</p>	<p>The net impact of the increased UK tourism deficit from expansion, described as a 'key diagnostic tests' by the DfT (Wider Economic Impacts of Regional Connectivity, 2018) should be estimated and included.</p>	<p>The mechanisms through which the Project would affect welfare via tourism flows are discussed in more detail in the <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> [<a href="#">APP-251</a>].</p> <p>Due to the limited evidence through which inbound and outbound tourism would affect welfare in the UK, a qualitative discussion of the welfare changes arising from increased tourism is provided. However, a study commissioned by ABTA found that outbound travel contributed £25 billion in direct GDP to the UK economy in 2019.</p>
<p>Socio-Economics &amp; Economics</p>	<p>The pay levels for new long-term jobs should be set out, and associated estimate of affordable housing demand for housing new lower-paid airport related jobs, against that for the current airport-related workforce.</p>	<p>Pay levels are a matter for individual employers and workers and will be set by them in the future based on labour market conditions as they are at that time.</p> <p>The Assessment of Population and Housing Effects (<b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> [<a href="#">APP-201</a>]) contains</p>

		<p>analysis of housing need. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>
Socio-Economics & Economics	<p>The impact of automation on future airport employment should be included, referencing historic trends.</p>	<p><b>ES Appendix 4.3.1: Forecast Data Book</b> <a href="#">[APP-075]</a> presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project.</p> <p>Section 12.1 discusses the impact of automation. It mentions that employment growth due to the NRP takes into account future efficiency gains driven by ongoing automation and new technologies.</p>
Noise and Vibration	<p>1 Rejected community stakeholder requests to change the format and timetable for engagement to improve compliance;</p>	<p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> records the process by which the Noise Envelope Group Terms of Reference (Appendix 1) and programme of meetings was set up. Originally conceived to run from 26 May until 9</p>

		September, the period of engagement was extended to 11 October with the Noise Envelope Group Output Report completed and published the week commencing 31 October.
Noise and Vibration	2 Failed to provide additional data and analysis required for effective engagement	<b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> records some of the data and analysis that was provided during and between the NEG meetings.
Noise and Vibration	3 Ignored almost all community comments. Gatwick's Noise Envelope Group Output Report fails to reflect community group views on its proposals and its engagement process.	All comments from community groups were considered in developing the noise envelope. <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> records the significant exchanges of ideas. <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a> explains how the options were developed including references to options preferred by various stakeholder.
Noise and Vibration	Gatwick's proposals do not: 1. Meet government policy (APF, 2013) that "Future growth in aviation should ensure that benefits are shared between the aviation industry and local communities ...the industry must continue to reduce and mitigate noise as airport capacity grows." Instead, the proposals would permit noise to increase substantially and potentially indefinitely, so benefits of growth accrue almost entirely to Gatwick and its customers.	Sharing the benefits was discussed in various Noise Envelope Group (NEG) meetings. GAL presented its estimates of sharing the benefits to the NEG on 23 June 2022, see <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> p164 to 175, using the methodology referred to in the Bristol Airport Planning Appeal Decision, Appeal Ref: APP/D0121/W/20/3259234, 2 February 2022. The policy gives no method for assessing the degree of sharing nor the extent that should be shared, and the planning inspector for the Bristol case approved the scheme



		as consistent with noise policy, whilst noting that 77% of this potential noise benefit was to be taken by ATM growth.
Noise and Vibration	2. Give communities certainty about future noise levels (APF para.3.29), because they do not contain any proposals to limit noise in the winter period, and would allow future reviews to increase noise limits.	In addition to existing measures which continue to successfully limit noise at Gatwick, an annual cap of 380,000 commercial Air Transport Movements is included in the DCO that covers the winter, as well as the summer when noise impacts are at their greatest. Section 6 of the <b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a> explains the control that would be in place for reviews that could take place in specific circumstances.
Noise and Vibration	3. Incentivise airlines to introduce the quietest suitable aircraft as quickly as is reasonable. Gatwick should be required to engage properly with community groups and councils, under agreed independent chairmanship, to develop new proposals that comply with policy and guidance.	A Noise Envelope is a requirement of government policy and has been developed in accordance with that policy as summarised in <b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a> . In September 2021 the Preliminary Environmental Information Report (PEIR) outlined the Noise Envelope proposal for the northern runway Project. The concept has been developed considerably since then, taking account of extensive stakeholder input, to form the fully implementable and enforceable set of noise limits and procedures described in the <b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a> . The background to the Noise Envelope is described in <b>Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.

		<p>Gatwick airport already has a well-developed and comprehensive noise management system summarised in Section 3 of <b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a> which is monitored and enforced through a number of processes including the 2022 Section 106 Agreement with the local authorities, the Noise Action Plan through Defra and the Environmental Noise (England) Regulations 2006, and Operating Procedures and Operating Restrictions (including the Night Restrictions) enforced by the Department for Transport. It is not the purpose of the Noise Envelope to replicate these or prescribe particular actions to reduce noise, but rather to set the overall noise limits that must be achieved to ensure noise is limited and reduces, and the processes to ensure these are legally enforceable. This is what the proposed Noise Envelope provides. It provides limits on overall noise levels during the day and the night, enforceable through the Development Consent Order and processes outlined therein (see sections 15 and 16 of the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a>).</p> <p>The Night Restrictions limit numbers of aircraft and total noise quotas in the 6.5 hour period 2330 to 0600. The Noise Envelope noise contour area limits additionally apply to the 8 hour night period 2300 to 0700 and the 16 hour daytime period 0700 to 2300 hours, and so for the first time places</p>
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		limits of community noise exposure across the whole 24 hour period. The enforceability of these limits through the DCO, if granted, gives certainty that these limits will not be exceeded so that aircraft noise will be limited and will reduce during the second noise envelope period as required by government policy.
Noise and Vibration	The ANPS requires a ban on scheduled night flights for 6.5 hours between 23.00-07.00, and requires airports to make particular efforts to incentivise use of the quietest aircraft at night. The ANPS is stated to be important and relevant for any airport NSIP in South East England, including Gatwick.	<p>Night flying controls are a matter for government.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>The Government has recently published proposals for consultation which would extend the current night regime at Gatwick to 2028.</p>
Noise and Vibration	A night flight ban should be a condition of any approval of the DCO, as should provision of a	Please see the responses provided above.

	comprehensive package to incentivise the use of the quietest aircraft at night outside the these hours.	
Water Environment	The SES Water’s assessment should include identifying source(s) of additional water extraction and its impact on water neutrality and biodiversity.	<p>Discussions have been ongoing with SESW regarding the increased demand on water sources that the NRP would produce. However, to date no concerns have been raised by SESW as to their sources and network’s ability to meet the additional demand.</p> <p>The NRP does not include a target for reduction in potable water use. However separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As stated in Section 11.5.2 of <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> as a conservative approach this reduction has not been taken into account in the assessment of impacts.</p>
Water Environment	Thames Water’s assessment should detail how increased foul and surface water impacts: Horley and Crawley STPs; direct/indirect river outflows; and other pollution incidents. Both are required in advance so they are fully reflected in the EIA. The DCO should then set out the measures required to help restore the river Mole’s poor and declining water quality and reduce flood risk, including to address existing road/parking	<p><b>Wastewater</b></p> <p>Modelling of the wastewater sewer system undertaken to inform the <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> demonstrates that with mitigation measures included in the NRP (see Table 11.8.1), Gatwick Airport’s wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface water ingress to</p>

	<p>run-off pollution and large volume outflows from firefighting.</p>	<p>the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development and they would recoup their costs through infrastructure charges to GAL.</p> <p><b>Fluvial (River) Flood Risk</b> The airport is currently at risk of flooding from local watercourses such as the River Mole and Gatwick Stream as reported in Section 5 of <b>ES Appendix 11.9.6 Flood Risk Assessment</b> [<a href="#">APP-147</a>]. However through provision of the mitigation measures listed in Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] the NRP will not increase existing levels of fluvial (river) or surface water drainage flood risk for its lifetime including the predicted impact of climate change.</p> <p><b>Water Quality</b></p>
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		<p>Water quality impacts have been assessed as part of <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and the Applicant has undertaken a number of assessments in relation to water quality. The results of these assessments demonstrate that the NRP does not change the overall surface water drainage strategy for the airfield and there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds augmented by additional below-ground attenuation to ensure no increase to flood risk.</p> <p>The surface access improvements associated with the NRP includes a drainage strategy as documented in the <b>ES Appendix 11.9.6 Flood Risk Assessment - Annexes 1-2</b> <a href="#">[APP-148]</a>. This comprises of Sustainable Drainage Systems (SuDS) to address the additional runoff from increased traffic movements as a consequence of the NRP. This includes oversized pipes, basins and swales. The use of vegetated drainage systems provides water quality treatment to the runoff from the highway.</p> <p>Full details on the water quality assessment for surface access improvements can be found in <b>ES Appendix 11.9.3 Water Quality HEWRAT Assessment</b> <a href="#">[APP-144]</a>. The results, as stated in Paragraph 5.1.2 of the assessment, present no failures for soluble or sediment-bound pollutants in routine runoff, and the</p>
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		<p>overall spillage risk for each drainage catchment is within acceptable limits. In terms of environmental impacts, the results indicate that the overall significance of effect from routine runoff has been established as minor adverse, and therefore not environmentally significant, as stated in Paragraph 4.1.3 in <b>ES Appendix 11.9.3 Water Quality HEWRAT Assessment</b> [<a href="#">APP-144</a>].</p> <p><b>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment</b> [<a href="#">APP-143</a>] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary.</p> <p>Section 4 of <b>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment</b> [<a href="#">APP-143</a>] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has</p>
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		<p>been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p><b>Emergency Response</b> The comment ‘large volume outflows from firefighting’ suggests a major incident. In the event of a major incident runoff would be intercepted at one of surface water drainage balancing ponds. As such the flow can be prevented from reaching any watercourse through control facilities such as sluice gates to shut off discharges. GAL’s existing standard procedures ensure that any contaminated water is contained and either treat it or tanker it away for treatment offsite. As part of GAL existing procedures, it retains the services of an emergency environmental response contractor based near Tonbridge who can be on site within hours to remediate major pollution events.</p>
Water Environment	Monitoring of outfalls and diffuse pollution should be strengthened.	<p>The Applicant notes the request for increased monitoring of outfalls in relation to concerns regarding the risk of increased pollution as a result of NRP. GAL already undertakes monitoring of its discharges to local watercourses.</p> <p>Requirements 10 and 11 of the <b>Draft Development Consent Order</b> <a href="#">[AS-</a></p>



		<p><a href="#">127</a>] include commitments to agree monitoring plans of the surface, foul and highway drainage outfalls before construction can commence with the Local Planning Authority, Environment Agency and Lead Local Flood Authority.</p> <p>Table 11.8.1 in <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] schedules the monitoring that will be undertaken as part of NRP for the water environment:</p> <ul style="list-style-type: none"> <li>• Ongoing monitoring of surface water drainage discharges</li> <li>• Regular monitoring of any change to the channel bed and banks would be undertaken, particularly in the vicinity of the River Mole re-naturalised channel, the Museum Field FCA spillway, car park X outfall, and existing Gatwick Stream outfall</li> <li>• Groundwater quality monitoring during construction.</li> </ul> <p>If significant negative change occurs, appropriate mitigation would be implemented. Any monitoring programme developed would have a resolution and timing appropriate to the impacts being monitored.</p> <p>GAL would continue to monitor the quality of water discharges to ensure compliance with environmental permits during operation of the NRP. Given the increased de-icer loading, additional water quality monitoring within Gatwick’s system would be implemented as part of the overall</p>
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		<p>water quality management system. These permits are listed in <b>List of Other Consents and Licences'</b> <a href="#">[APP-264]</a>.</p>
<p>Climate Change</p>	<p>Gatwick should not be allowed to understate the climate impact on flooding by selecting a shorter design life for runways than for highways. The full climate uplift on flood risk must be modelled, and mitigated. The impact of empirical data on how climate change is already increasing the frequency and severity of flooding must be fully assessed.</p>	<p><b>Consideration of Climate Change and Design Life</b></p> <p>The adopted lifetime for the airfield works is 40 years (up to 2069), therefore the airfield surface water drainage design has been based on the Central allowance of + 25% for the 2070s epoch (2061 to 2125) the 1 per cent (1 in 100) Annual Exceedance Probability (AEP) event for rainfall intensity in accordance with the same Environment Agency guidance, as stated in Paragraph 3.7.15 of <b>ES Appendix 11.9.6 Flood Risk Assessment</b> <a href="#">[APP-147]</a>.</p> <p>The adopted lifetime of the surface access works is 100 years (up to 2132), therefore the highways drainage design has adopted the Upper End allowance: a 1 per cent (1 in 100) AEP event, +40% climate change allowance for rainfall intensity, as per Flood Risk Assessments: climate change allowances guidance (Environment Agency, 2022. Peak river flow climate change allowances by management catchment<sup>2</sup>. as stated in Paragraph 3.7.14 in <b>ES Appendix 11.9.6 Flood Risk Assessment</b> <a href="#">[APP-147]</a>.</p>

<sup>2</sup> Available at <https://www.gov.uk/government/publications/peak-river-flow-climate-change-allowances-by-management-catchment>)

		<p>It is considered that a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. Assessment of climate change allowances over a longer design life is therefore considered disproportionate as the aviation industry has changed considerably during the past 40 years and this rate of change is anticipated to continue.</p> <p>The assessment of flood risk impacts incorporates the predicted impact of climate change over the lifetime of NRP in compliance with national planning policy, see Section 3.7 of <b>ES Appendix 11.9.6 Flood Risk Assessment</b> [<a href="#">APP-147</a>].</p>
<p>Ecology and Nature Conservation</p>	<p>A landscape-scale approach is required to assess biodiversity impacts. This should address the effects on ecological networks in terms of habitat connectivity and function such as the loss of Riverside Garden Park on individual species (e.g. bats). This should include overall impacts on surrounding landscapes including: fragmentation of habitat (e.g. by woodland removal); increased impacts due to surface transport changes; increased flood risk and any potential water extraction.</p>	<p>As set out in paragraph 9.4.9 et seq. of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>], 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 outside the Order 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 <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>]. This concluded that, although there would be nowhere that</p>

		<p>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>Impacts on designated sites from changes in transport flows on receptors in the wider landscape are assessed in both Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] and <b>ES Appendix 9.9.1: Habitats Regulations Report</b> [<a href="#">APP-134</a> and <a href="#">APP-135</a>].</p> <p>The Project addresses all flood risk requirements and, as such, there is no increased risk of such events on ecology receptors.</p> <p>No water extraction is proposed.</p>
Ecology and Nature Conservation	Gatwick should confirm that BNG delivery is separate from and additional to requirements under the mitigation hierarchy, and will be fully implemented.	The BNG delivery has been developed based on the mitigation hierarchy and is set out in <b>ES Appendix 9.9.2 Biodiversity Net Gain Statement</b> [ <a href="#">APP-136</a> ].
Ecology and Nature Conservation	The impact of the time lag between habitat loss and subsequent creation and maturity (e.g. woodland) and associated with the long construction period should be assessed and mitigated. Gatwick must clearly set out the	The areas of each habitat lost are described in Annex 3 of <b>ES Appendix 9.9.2 Biodiversity Net Gain Statement</b> [ <a href="#">APP-136</a> ]. Monitoring and management of newly created habitats are described in <b>ES Appendix 8.8.1 Outline Landscape and Ecology</b>

	total area of each habitat being lost, delay in re-provision, subsequent mitigation and compensation, and proposed monitoring and management of newly created habitats.	<b>Management Plan</b> [ <a href="#">APP-113</a> , <a href="#">114</a> , <a href="#">115</a> and <a href="#">116</a> ].
Traffic and Transport	Gatwick’s proposals and mode share targets fail to prevent a significant growth in car use for surface access. Modelling of the increased traffic volumes show unacceptable increases in local journey times (e.g. along the A23 corridor). Gatwick should adopt mode share commitments without any increase in car use and all additional surface access via sustainable transport.	Strategic transport modelling has been undertaken for the region, as set out in Chapter 12 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant impacts are identified. No mitigation is therefore necessary.
Traffic and Transport	Gatwick plans only limited investment in public transport. Gatwick should reprioritise its surface access investment to sustainable travel, which means public transport for most passengers.	Chapter 5 of <b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ] sets out funding commitments towards bus and coach services. The routes which have been identified are considered to be those most likely to have greatest influence on mode shares. These improvements have been tested in the strategic transport model to achieve the mode shares assessed as part of the DCO Application.  GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other or alternative services if they would result in an equivalent level of public transport accessibility and support achieving the mode share

		commitments that GAL is making within <b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ].
Traffic and Transport	The project will increase demand pressure on London-Brighton mainline trains, forecast to already become crowded. Modelled future rail capacity assumptions reflect rail industry plans to accommodate rail demand growth without Gatwick expansion to 2029. No increased rail capacity is planned or funded.	A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project.
Traffic and Transport	There should be clear proposals to prevent increased off-airport parking. Assuming the base distribution of off-airport parking spaces for all future scenarios is unrealistic. Sensitivity analysis of the impact of unconstrained (street and commercial) off-airport parking on the surface transport modelling should be completed.	GAL has limited influence on the operation of off-airport parking. GAL is committed to working with the authorities to ensure that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ] sets out GAL's commitment to provide funding to support local authorities in introducing effective parking controls, monitoring activity on surrounding streets and/or taking enforcement action against unauthorised off-airport passenger car parking.
Traffic and Transport	Proposals lack detail on facilities for increased active transport and safety of the redirected Riverside Garden Park route.	Paragraphs 5.2.110 and paragraph 5.2.118 of <b>ES Chapter 5 Project Description</b> [ <a href="#">AS-133</a> ] summarises the active travel proposals in the vicinity of Riverside Garden Park including the proposed signal controlled crossing of A23 London Road and the shared use

		<p>ramp connection into Riverside Garden Park. These proposals are illustrated in <b>4.8.1 Surface Access Highways Plans - General Arrangements - For Approval</b> [<a href="#">APP-020</a>].</p> <p>GAL is also committed to further improvements of NCR21 in the vicinity of South Terminal including:</p> <ol style="list-style-type: none"> <li>1. Improved wayfinding and enhancements to the condition and alignment of NCR21 where the route passes beneath the railway station and South Terminal buildings.</li> <li>2. Widening a short section of the path to the south of the railway station near the crossing of Gatwick Stream to remove a pinch point constraining active travel users (subject to acquiring rights over a parcel of Crown Land with investigations into the feasibility of this ongoing).</li> </ol> <p>The timeline for the delivery of these NCR21 works is to be confirmed at a later date including whether it will be delivered as part of the Northern Runway Project or as a separate scheme.</p> <p>These active travel infrastructure proposals will provide safer access to and from Riverside Garden Park.</p>
Design	The sufficiency of supporting infrastructure, including new terminal capacity to meet the forecast intensification of the	The description of the Project proposals is contained in <b>ES Chapter 5: Project Description</b> [ <a href="#">AS-133</a> ] which has underpinned the full

	current runway, and then use of the new runway is not assessed.	Environmental Impact Assessment contained in the submitted <b>Environmental Statement</b> .
Landscape, Townscape and Visual	The impact of building heights, particularly the new CARE facility incinerator (48m) and new hanger at the west of the site (32m), is not addressed.	Maximum parameter models have been assessed for all elements within the Project (where necessary) and form an appropriate level of detail required for the application (see Table 8.7.1 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]</b> ). The maximum footprint and height of all key elements of the Project are referred to in Table 8.7.1 and have informed the assessment of effects on landscape, townscape and visual amenity. Wireline photomontages at Figures 8.9.1 to 8.9.28 illustrate the Project within 32 views towards Gatwick and accurately demonstrate the maximum scale, mass and height of the Project within the existing context of extensive development at the airport and settlements of Crawley and Horley.

### 3.37 Gatwick Diamond Business

3.37.1 Table 3.37.1 below sets out the Applicant’s response to the issues raised within the RR from Gatwick Diamond Business [[RR-1498](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.37.1 Applicant’s response to the matters raised by Gatwick Diamond Business**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General – Support	London Gatwick is not just an airport; it’s a pillar of the local economy, providing jobs, opportunities, and driving investment across a range of industries. Along with our	Noted. The Applicant welcomes Gatwick Diamond Business’ support for the Project.



	<p>members, (80% of respondents to a recent survey saying 'yes' in support of the airport's Northern Runway project), we understand the important role the airport plays in ensuring we can all thrive.</p>	
<p>Socio-Economic and Economics</p>	<p>The South East, including Gatwick Diamond, continues to recover from the COVID-19 pandemic's ongoing economic challenges and capitalising on new international Asian and Pacific trade deals following BREXIT. Gatwick Airport's plan for the Northern Runway represents the one solution in the region that addresses both nationally and regionally the challenges businesses have been presented with, and that will help them address these obstacles, thrive once again and create a prosperous future for all. For us, resilience (and the responsibility it entails) means also safeguarding the prosperity of a region that contributes £24 billion to the UK economy. Creating over 10,000 new jobs and an economic boost to our region of over £1 billion per year will create a dramatic economic, employment and career opportunity ripple effect. Large and small businesses</p>	<p>Noted.</p>

	<p>and the communities they serve, not to mention the high-growth multinational corporations investing in the region, will all benefit from a new, resilient future. That's what the Northern Runway Project at Gatwick could create. Crucially, economic growth and resilience are only the start. gdb also supports Gatwick Airport's pledge to create even more social value for the region, providing education and training opportunities. We look to continue working with a thriving airport to ensure local businesses and people have a place in the airport's supply chain.</p>	
<p>Greenhouse Gases</p>	<p>gdb member's support is conditional on Gatwick's commitment to improving local road infrastructure, delivering its net Zero environmental undertakings and active participation in JetZero and other airline industry and UK/UN government climate targets, sustainability policies, noise, emission and airspace management.</p>	<p>The comment is noted and the support is welcomed. The Project includes surface access improvements, as set out in Section 2.2 of <b>Transport Assessment</b> <a href="#">[AS-079]</a>. In addition, Gatwick is committing to arrange of surface access measures in its <b>Surface Access Commitments</b> <a href="#">[APP-090]</a>.</p> <p>Gatwick is committing to a far reaching <b>Carbon Action Plan</b> <a href="#">[APP-091]</a>. whether or not the NRP DCO is approved. There, GAL commits to exceeding the requirements of the Jet Zero Strategy in relation to emissions from airport infrastructure and to playing its full part in ensuring the Gatwick airport is Jet Zero ready.</p>

Socio-Economics and Economics	gdb's support is tied to Gatwick Airport strengthening our economy and actively contributing to a greener and more sustainable future across the business, tourism, travel and aviation sectors	GAL is committed to enhancing the economic benefits of the NRP through its <b>Employment Skills and Business Strategy</b> [ <a href="#">APP-198</a> ].
Traffic and Transport	gdb believes implementing the Northern Runway plans will catalyse further needed Infrastructure investment. Investment in infrastructure around Gatwick Airport would benefit passengers, staff, local businesses and local residents.	This supportive response is welcomed and noted.
Socio-Economics and Economics	Infrastructure investments would stimulate economic growth in the surrounding area, creating new jobs and businesses. This would benefit passengers and staff, providing a broader range of services and amenities near the airport. We look to continue working with a thriving airport to ensure local businesses and people have a place in the airport's supply chain.	Noted.
Traffic and Transport	Investment in infrastructure around Gatwick Airport would benefit passengers, staff, local businesses and local residents in several ways, including: <ul style="list-style-type: none"> <li>• Improved transport links: Enhanced road and rail infrastructure</li> </ul>	The Project includes surface access improvements, as set out in Section 2.2 of <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. This supportive response is welcomed and noted.

	<p>and connections to the airport, making it easier and quicker for passengers and staff to travel to and from the airport, reducing congestion and improving journey times.</p> <ul style="list-style-type: none"> <li>• Enhanced airport facilities: Investments in airport facilities, such as terminal upgrades, additional security checkpoints, and expanded baggage handling areas, would lead to a more seamless and enjoyable travel experience for passengers. Staff would also benefit from improved working conditions and more efficient operations. .</li> <li>• Economic growth: Infrastructure investments would stimulate economic growth in the surrounding area, creating new jobs and businesses. This would benefit passengers and staff, providing a broader range of services and amenities near the airport.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• Environmental benefits: Investments in sustainable transport infrastructure, such as electric vehicle charging stations and improved cycling and walking routes, would encourage more environmentally friendly travel choices, reducing pollution and improving air quality. This would benefit passengers, staff, and the wider community.</li> </ul>	
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### 3.38 Gatwick Diamond Initiative

3.38.1 Table 3.38.1 below sets out the Applicant’s response to the issues raised within the RR from Gatwick Diamond Initiative [[RR-1499](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.38.1 Applicant’s response to the matters raised by Gatwick Diamond Initiative**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General – Support	Gatwick Airport is at the heart of our region and the future of its economic growth. The South East continues its fight to recover from the COVID pandemic, Brexit and the ongoing global economic challenges. The last few years have shown the importance of resilience.	Noted. The Applicant welcomes Gatwick Diamond Initiative’s support for the Project.
Socio-Economics	For us, resilience (and the responsibility it entails) means safeguarding the	GAL is committed to enhancing the economic benefits of the NRP through

<p>and Economics</p>	<p>prosperity of a region that is home to 45,000 businesses and 500 international businesses, contributing £24 billion to the UK economy. It is a responsibility GDI take very seriously. GDI believe that Gatwick's Northern Runway project, with its creation of over 10,000 new jobs, delivering an economic boost to the Gatwick Diamond region of over £1 billion per year will create a tangible economic ripple effect. Businesses large and small and the communities they serve, not to mention the high-growth multinationals who invest and operate in the Gatwick Diamond, will all enjoy the benefits of a new resilient future for our region. With the Northern Runway in operation, Gatwick can continue to be a gateway to even more new global and regional business connections.</p>	<p>its <b>Employment Skills and Business Strategy</b> [<a href="#">APP-198</a>].</p>
<p>Socio- Economics and Economics</p>	<p>The first increase in runway capacity in the UK for over 50 years is more than just about the airport; it's about supporting our economy and strengthening our resilience. A vital catalyst that creates an opportunity to deliver social value for the region, securing future employment that will deliver future</p>	<p>Noted.</p>

	education and training opportunities.	
Greenhouse Gases	It's equally essential that Gatwick continues its commitment to environmental sustainability. The Northern Runway plans align with the broader ambitions of the UK aviation sector, aiming to achieve net zero aircraft emissions and contribute to the Government's climate targets. Bringing the northern runway at Gatwick into regular use will strengthen our economy and contribute to a greener and more sustainable future.	<p>As the representation states, the NRP aligns with the Government's strategy to meet aviation demand whilst ensuring a trajectory to net zero emissions.</p> <p>Gatwick has a long track record of investing in sustainability, not least through its Decade of Change initiatives. That track record will be extended by commitments made in the DCO application, including GAL's commitment to its <b>Carbon Action Plan</b> [<a href="#">APP-091</a>].</p>
General – Support	In September 2023, 51 regional and national business groups, retained to represent the views of 55,000 businesses, came together with the Gatwick Diamond Initiative to support Gatwick's Northern Runway project and its associated infrastructure improvements. Gatwick's commitment to further developing opportunities for local Gatwick Diamond businesses to share in the success of the airport by participation in its supply chain or strong career opportunities, for example, alongside it's carbon programme and global Jetzero initiatives means we	Noted. The Applicant welcomes Gatwick Diamond Initiative's support for the Project.

	lead the support from the business community.	
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### 3.39 Gatwick Green Limited

3.39.1 Table 3.39.1 below sets out the Applicant's response to the issues raised within the RR from Gatwick Green Limited [[RR-1500](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.39.1 Applicant's response to the matters raised by Gatwick Green Limited**

Topic	Matter raised in the RRs	The Applicant's response
General - Opposition	The DCO application does not fully address the concerns and objections raised in GGL's previous representations at the pre-submission stage, dated November 2021 and July 2022. On this basis, GGL objects to the NRP proposals. The information contained in the DCO application does not change this position.	Noted.
Draft DCO, Consents and Agreements	In addition to the proposed amends to draft DCO Requirement 12, GGL considers it prudent and necessary for GAL to be required to submit and gain the approval of an access strategy, to ensure that access to third party land during the operation of the Northern Runway Project is at all times maintained.	The proposed development has been designed so as to ensure that access to neighbouring land is not inhibited.  As regards neighbouring farm holdings, measures will be implemented in accordance with <b>ES Appendix 5.3.2: Code of Construction Practice</b> [ <a href="#">APP-082APP-082</a> ] during construction to reduce, as far as possible, the effects of construction activities. These measures include maintaining farm access locations. GAL does not consider a separate access strategy to be necessary.



		As regards GGL's proposed amendments to Requirement 12, the appendices to GGL's Relevant Representation on the PINS website <a href="#">[RR-1500]</a> these is incomplete, meaning that GAL has been unable to consider this.
Compulsory Acquisition and Compensation	GL is confident that through the adoption of a proportionate compulsory acquisition strategy and the inclusion of protective provisions in the DCO and appropriate control mechanisms in the relevant control documentation, its objection can be withdrawn and coexistence benefiting both development proposals enabled and secured.	Noted.
Compulsory Acquisition and Compensation	1.1 Land-take The DCO proposals identify both temporary possession and permanent compulsory acquisition of part of GGL's land east and north east of Gatwick Airport. Adequate and effective consultation under the Act <sup>1</sup> and the related guidance <sup>2</sup> is required at the pre-submission stage in the DCO process. As a statutory consultee under s42 of the Act, GGL considers that there was a lack of sufficient meaningful engagement by GAL on the land-take requirements at the pre-application stage. Discussions have continued between the parties, but GGL remains concerned that GAL:	The Applicant notes the comments raised regarding consultation, however since this Relevant Representation was submitted, significant progress and consultation has taken place. The Applicant has considered other construction options and designs following input from GGL. In addition to this, the Applicant is exploring a number of the proposed amendments to the Heads of Terms and is awaiting comments back from GGL. The Applicant's representatives are confident that there are practical measures which can be used to minimise disruption and mitigate losses.

	<p>1) has failed to consider alternative designs or implementation methods that would minimise the extent of land proposed for compulsory acquisition; and</p> <p>2) has failed to consider that, in respect of GGL’s land, the NRP can be delivered via a mix of temporary possession and permanent rights, and as a result, is seeking to compulsorily acquire freehold interests where temporary possession and the grant of rights would adequately achieve the same aims.</p> <p>3) has failed to include protective provisions within the DCO and relevant control mechanisms in the relevant supporting control documentation to ensure that access to GGL’s land both during construction and operation will be maintained at all times.</p>	
<p>Traffic and Transport</p>	<p>1.2 Transport and Highway considerations Whilst the DCO application and Environmental Statement describe the extent and nature of the highway schemes to support the NRP, the DCO must include protective provisions and appropriate control mechanisms in the relevant control documentation, to ensure that access to GGL’s land will be maintained both during construction and operation of the NRP project.</p>	<p>GAL notes the draft protective provisions appended to GGL's Relevant Representation. GAL is continuing to discuss with GGL the best way of addressing its concerns in the context of the works proposed. It is hoped that reassurance can be provided or practical arrangements can be implemented to avoid the need to incorporate protective provisions in the DCO, particularly given that GGL is not a statutory undertaker and in light of the nature of its interests.</p>

	<p>The lack of detail on provision for active modes is unhelpful given that the Local Plan and NPPF focus on improving safe cycle and pedestrian routes.</p>	<p>The proposed active travel improvements have been influenced by the enhancements set out in the Chapter 5 of <b>ES Appendix 5.4.1: Surface Access Commitments</b> document [<a href="#">APP-020APP-020</a>].</p> <p>The proposed active travel provision has been developed with due consideration of schemes identified in the Reigate and Banstead Local Cycle and Walking Infrastructure Plans (LCWIP) and Crawley LCWIP to complement these proposals as well as delivering a number of them.</p>
<p>Compulsory Acquisition and Compensation</p>	<p>Land-take GGL owns land north and south of the M23 spur road, the southern land accommodating the Gatwick Green proposed industrial and logistics allocation in the DCBLP. The DCO application includes details of the proposed acquisition of some of GGL's land in these areas (see plan at Appendix 1). Land north of the M23 spur is also ear-marked for strategic employment uses. The land was identified by Reigate &amp; Banstead Borough Council (RBBC) in 2015 as an area for potential future employment development – as reported to its Executive Committee on 15th October 2015 – and relates in part to c 40 ha of land east of Balcombe Road<sup>3</sup>, which includes the land owned by GGL. Whilst not allocated at this stage, it represents a realistic</p>	<p>Note response above.</p>

prospect acknowledged by RBBC, and its delivery should not be prejudiced by the NRP. GAL is seeking to compulsorily acquire the freehold to land owned by GGL north and south of the M23 spur, the majority of which, in the view of GGL, is not required to deliver the NRP Project. Area 3 – See plan at Appendix 4.

Section 122 of the Act requires the applicant to demonstrate that any land proposed for acquisition is needed to deliver the Project. Paragraph 11 of the Guidance states that an applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition, (including modifications to the scheme), have been explored. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. GAL has to date provided no detailed justification for the freehold acquisition of these areas in the context of the principles and requirements governing the compulsory acquisition of land and has failed to consider alternative means to acquiring the

	necessary rights to deliver the NRP Project.	
Compulsory Acquisition and Compensation	<p>To demonstrate the point, GGL has divided the land into 3 sections (See Plan at Appendix 2) as follows:</p> <p>Area 1 – See plan at Appendix 2 This Area is identified by GAL within the DCO for both permanent acquisition and temporary possession. GGL has no objection to the area proposed for permanent acquisition. This area is identified within both the Crawley Borough Council adopted local plan and the DCBLP, as safeguarded for surface access for the wide spaced runway. GGL also has no objection to the temporary possession of land identified in Area 1.</p> <p>Area 2 – See plan at Appendix 3 This Area is identified by GAL within the DCO for permanent acquisition. 3 The other 30 ha west of Balcombe Road has been allocated in Reigate and Banstead Borough Council’s Development Management Plan (2019) as the planned Horley Business Park 4 Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land (September 2013) GAL has given no detail or explanation as to why temporary possession and subsequent rights to inspect,</p>	Noted in the above response.

repair, maintain, etc. of this area would not achieve the same aims and on that basis, GAL has failed to demonstrate the necessity for permanent acquisition. GGL objects to the permanent acquisition of this area and believes GAL should be required to demonstrate why temporary possession powers and subsequent grant of rights should not be sought as an alternative to permanent freehold acquisition. GGL believes that powers of temporary possession and subsequent rights to repair, maintain, etc. should be sought over Area 2. In support of this more proportionate alternative acquisition strategy, National Highways has rights over the area hatched black for 'constructing maintaining inspecting altering repairing renewing and using a balancing pond thereon' which demonstrates that permanent acquisition of the land is not necessary to deliver this aspect of the NRP Project. The area coloured green shows the existing access to a field in agricultural use, over which temporary possession and subsequent grant of rights can be granted to GAL – any power to temporarily possess this area must be conditional upon the inclusion of protective provisions within the DCO and relevant

	control mechanism in the relevant control documentation, to ensure that the green area will be kept clear and open at all times and the entrance in to the field will not be impaired.	
Agricultural Land Use and Recreation	The DCO application has overlooked the loss of the agricultural access, which represents a major significant adverse effect in terms of 'Agricultural Land Use and Recreation'. The GAL plans do not appear to confirm that GAL will ensure that the current access is maintained or offer an alternative agricultural access. Protective provisions and control mechanisms ensuring that access to this premises is at all times maintained must be included in the DCO.	Measures would be implemented during the construction of the Project in accordance with the <b>ES Appendix 5.3.2: Code of Construction Practice [APP-082]</b> to reduce, as far as possible, the effects of construction activities on farm holdings. The Applicant's agents have been consulting with Gatwick Green Limited's appointed agent to enter into a voluntary agreement which included provisions to maintain access as far as possible during the works. Where appropriate, these would include the maintenance of farm access locations; provision of appropriate fencing; maintenance of water supplies; co-ordination of timing of construction works to facilitate farming operations; and measures to address the potential risks of the spread of animal and plant diseases.
Traffic and Transport	The design criteria for assessing the revised Highway Improvement Works, includes road safety, design standards, highway capacity, construction methods and minimising disruption, and the need to limit impacts on the environment. However, none of these considerations address the need to demonstrate that the Highway	Microsimulation VISSIM modelling of the roads around the airport has been undertaken for the assessment years of 2032 and 2047, with and without the Project. As set out in Chapter 13 of the <b>Transport Assessment [AS-079AS-079]</b> , the VISSIM modelling indicated that without the Project in the future baseline scenarios, the network would begin to operate close to capacity in several locations. The inclusion of the

	<p>Improvement Works represent the most appropriate solution that minimises effects both direct and in direct, and enables co-existence, particularly on private landowners. Proposed Gatwick Spur Road and Southern Terminal Access Proposal.</p>	<p>highway works as part of the Project prevents unacceptable highway conditions arising once the Project is in place.</p> <p><b>Environmental Statement - Chapter 3 Alternatives Considered</b> [<a href="#">APP-028APP-028</a>] and the associated appendices provide commentary on the alternatives considered for the highway improvement works.</p>
<p>Traffic and Transport</p>	<p>GGL has concerns over the Gatwick Spur Road Proposed South Terminal Roundabout Improvements in the DCO application. These specifically relate to the following:</p> <ol style="list-style-type: none"> <li>1. GGL is pleased to see that as currently drawn the NRP Project does not have a direct operational impact upon the existing northern access for Gatwick Green however, GGL believes it is both necessary and prudent that protective provisions are included in the DCO and control mechanisms in the relevant control documents, to ensure that access to Gatwick Green shall at all times be maintained and no unforeseen or unassessed direct or indirect significant effects arise.</li> <li>2. During the construction phase of the NRP, it is essential to ensure that the NRP Project takes full account of the proposed northern access to Gatwick Green. This relates to the impacts on the operation (or</li> </ol>	<p>GAL notes the draft protective provisions appended to GGL's Relevant Representation. GAL is continuing to discuss with GGL the best way of addressing its concerns in the context of the works proposed. It is hoped that reassurance can be provided or practical arrangements can be implemented to avoid the need to incorporate protective provisions in the DCO, particularly given that GGL is not a statutory undertaker and in light of the nature of its interests.</p>



	<p>future provision) of the proposed junction on Balcombe Road to serve Gatwick Green, located adjacent to the M23 Spur overbridge. In order to ensure that access to Gatwick Green is maintained at all times during the construction of the NRP Project, the DCO should include protective provisions and control mechanisms in the relevant control documentation to ensure access to Gatwick Green is at all times maintained.</p>	
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### 3.40 Global Airlines

3.40.1 Table 3.40.1 below sets out the Applicant’s response to the issues raised within the RR from Global Airlines [[RR-1582](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.40.1 Applicant’s response to the matters raised by Global Airlines**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
<p>General – Support</p>	<p>The airport is significantly constrained for a number of reasons, primarily, in our estimation, around its ability to accept and handle additional services around peak hours. We believe the Northern Runway Project is a huge strategic opportunity to achieve Global Britain. It will allow the UK to thrive, by adding more capacity into a highly constrained, demand intensive market in the South East of England. This will allow new market entrants, like Global, to provide connectivity that facilitates</p>	<p>Noted. The Applicant welcomes Global Airlines’ support for the Project.</p>

	business, connects friends and families, and increases inbound tourism and spend across the UK economy.	
Planning and Policy	We believe it is consistent with UK Government policy, particularly making best use of existing infrastructure.	The comment is noted and agreed by the Applicant.
Socio-Economics and Economics	The creation of 14,000 new jobs and associated GVA for the economy in the South East.	<p>The detail on the type and location of jobs is included in <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> [<a href="#">APP-200</a>].</p> <p>GAL is committed to enhancing the economic benefits of the NRP through its <b>Employment Skills and Business Strategy</b> [<a href="#">APP-198</a>].</p>
Greenhouse Gases	We support Gatwick's sustainability ambitions, believe they are consistent with Government policy, and Global would commit to supporting the airport with that agenda, so the UK can continue to be a leader in sustainable aviation.	The comment is noted and the support is welcomed.
Planning and Policy	With significant levels of local support, consistency with government policy, strong economic and environmental benefits, the Northern Runway Project is deliverable and will demonstrate the UK's ambition for the future.	Noted. The Applicant welcomes support for the Project.
General - Support	In the short term, Global believes there is capacity within the South East of	Noted. The Applicant welcomes Global Airlines' support for the Project.

	<p>England to support the initial phase of our operations and additional capacity at Gatwick from 2029 onwards will be a huge opportunity to grow our network and develop our footprint in the area.</p>	
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### 3.41 Govia Thameslink Railway

3.41.1 Table 3.41.1 below sets out the Applicant’s response to the issues raised within the RR from Govia Thames Railway [\[RR-1598\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.41.1 Applicant’s response to the matters raised by Govia Thameslink Railway**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
<p>Traffic and Transport</p>	<p>GTR original response to Gatwick Airport Limited (GAL) consultation raised concerns regarding capacity of the Brighton-Gatwick-London railway (Brighton Mainline BML) that have not been addressed. The 3 paragraphs under Rail Strategy state (they are in discussion about rail improvements outside peak times, that service levels are lower, but a significant number of rail related journeys could be attracted to rail), despite the GTR consultation response stating additional capacity was required and providing details of off peak crowding.</p>	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment</b> <a href="#">[AS-079]</a> and the full set of rail data, including off-peak loading information, is included in <b>Environmental Statement - Appendix 12.9.2 Rail Passenger Flows</b> <a href="#">[APP-154]</a></p> <p>Rail assessments have been undertaken for two peak periods, Network and Project peak, as described in paragraph 9.3.21 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The Project peak reflects the hour with the highest increase in rail passengers as the result of the Project, which tends to be outside the network peak.</p> <p>The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail</p>

		services is expected as a result of the Project. Where standing is expected, spare standing capacity would remain available. The rail crowding assessment indicates that no mitigation is required.
Consultation	GAL has not engaged with GTR Strategic Planning about the concerns raised in our consultation response.	The Applicant has met with GTR since the consultation and continues to meet with GTR to discuss its comments in relation to the Project.
Traffic and Transport	The only additional trains in the peak are 2 per hour stopping trains that attach to another train at Redhill with a very slow journey time to London Victoria, and an additional fast train that doesn't stop at Gatwick Airport to London Bridge. These additional trains fill the space for perturbation when trains run late, and if ran all day would be very high risk as it would not be possible to recover from small delays all day, with the delays getting exported to much of the national rail network as trains from the BML line run to other mainlines including interaction with trains to the Midlands, North and Scotland. Unless additional capacity is provided to accommodate the additional passengers comfortably, expanding use of Gatwick Airport will result in even worse crowding of trains	As set out above, the rail assessment shows no significant increase in crowding on rail services is expected as a result of the Project and no mitigation is required.

	between the Sussex Coast and London than already exists both peak and off peak.	
Traffic and Transport	This will suppress the economic growth required to support the additional population from housebuilding currently underway in Sussex and result in significant increase of car use and road congestion undermining GAL's ability to reach its target for rail mode share of surface access.	The rail frequencies set out in Table 9.2.1 of <b>Transport Assessment [AS-079]</b> are included in the strategic modelling work. This has informed the mode share commitments and highway assessments.
Traffic and Transport	Additional passengers using Gatwick Airport will significantly increase passenger use on the BML. This railway has significant passengers standing in uncomfortable crowded conditions both peak and off peak and the track is at full capacity, unable to reliably increase the train service.	<p>As set out in Diagram 9.6.1 of the <b>Transport Assessment [AS-079]</b>, the strategic transport modelling work has shown that the highest increase in passengers from the Project is expected on the BML.</p> <p>Detailed assessments have been undertaken on the BML which are line loading (number of passengers on trains) at each station, the Seated Load Factor (how many seats on trains are occupied) and the percentage of standing capacity occupied (illustrates crowding when standing passengers are expected). Both Network and Project peak periods have been assessed, and full hourly loading information covering other off-peak periods is included in <b>Environmental Statement - Appendix 12.9.2: Rail Passenger Flows. [APP-154]</b></p> <p>As set out in paragraph 9.8.8 of the <b>Transport Assessment [AS-079]</b>, the</p>

		<p>assessment shows that there is generally standing on services in both directions between East Croydon and London Bridge and London Victoria in 2029 and 2032, in both the future baseline and with Project scenarios. The travel time for this section of the route is within the 20-minute threshold that DfT uses as guidance for acceptable standing, as long as the standing capacity is not exceeded.</p>
Traffic and Transport	<p>There is significant housebuilding in Sussex that will generate a significant increase of passenger use on trains running through Gatwick Airport. The Croydon Area Restructuring Scheme and wider Brighton Mainline Upgrade has been paused with no funding, but even that will not be enough to accommodate the expected additional passengers by mid-century.</p>	<p>The strategic transport modelling takes into account committed developments in the future baseline. Chapter 9 in the <b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> [APP-260] sets out the approach which is in keeping with DfT Transport Appraisal Guidance Unit M4. Committed major developments are therefore taken into account in the future baseline. The Croydon Area Restructuring Scheme has no complete funding commitment to be delivered at this stage and therefore it has not been included in the strategic modelling work in the future baseline or with Project scenarios.</p>
Traffic and Transport	<p>GTR response to the DfT's London and South Coast Corridor Study proposed building a new railway between central London, Gatwick Airport and the Sussex Coast to accommodate predicted growth.</p>	<p>This is noted.</p>

Traffic and Transport	For Gatwick expansion to take place it is critical that funding is made available to increase railway capacity between the Sussex Coast, Gatwick Airport and Central London. Additional Airport capacity at Gatwick Airport should not be provided or used until sufficient rail capacity has increased to enable passengers to travel comfortably beyond mid-century as proposed by GTR in our response to the London and South Coast Corridor Study and explained in our response to the GAL airport expansion consultation.	As set out above, based on the assessment undertaken, no significant increase in crowding on rail services is expected as a result of the Project and no mitigation is required.
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### 3.42 Hever Parish Council

3.42.1 Table 3.42.1 below sets out the Applicant's response to the issues raised within the RR from Hever Parish Council [[RR-1724](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.42.1 Applicant's response to the matters raised by Hever Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
General - Opposition	Hever Parish Council object to the Gatwick proposed project application and the significant damage and impact it will have on the Parish and beyond.	Noted.
Noise and Vibration, Air Quality & Socio-Economics	There are great concerns regarding noise and pollutants, on Hever Parish Council residents and on the AONB environment around	<b>ES Chapter 13: Air Quality</b> [ <a href="#">APP-038</a> ] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology

<p>and Economics</p>	<p>us, in addition to the potential impact on housing, employment and infrastructure as well as the wider environmental considerations</p>	<p>agreed with the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles from the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the High Weald National Landscape experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived. The impact of noise (amongst other factors) on the setting of heritage receptors is</p>
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		<p>assessed in <b>ES Chapter 7: Historic Environment</b> [<a href="#">APP-032</a>].</p> <p><b>ES Appendix 17.9.3: The Assessment of Population and Housing Effects</b> [<a href="#">APP-201</a>] contains specific analysis of housing need during the construction phase, including the scope within the private rented sector and another housing types/tenures to accommodate potential demand (based on peak employment). It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p> <p><b>ES Chapter 17: Socio-Economics</b> [<a href="#">APP-042</a>] provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services). It concludes that the socio-economic effects of the</p>
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		Project on community infrastructure are not significant.
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### 3.43 High Weald Area of Outstanding Natural Beauty Unit

3.43.1 Table 3.43.1 below sets out the Applicant’s response to the issues raised within the RR from the High Weald AONB Unit [\[RR-1726\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.43.1 Applicant’s response to the matters raised by the High Weald AONB Unit**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Greenhouse Gases	The impact on Climate Change objectives. Increased carbon emissions arising from the increased use of the airport (both from aircraft and associated traffic) jeopardise achieving international climate change objectives. In the High Weald, Objective G3 of the AONB Management Plan seeks: ‘Climatic conditions and rates of change that support continued conservation and enhancement of the High Weald’s landscape and habitats’. This recognises that climate change is irrevocably linked to biodiversity loss and damage to landscapes which have national and international protection.	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed. The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK’s legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate</p>

		<p>Change (2023), in which the following was included:</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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<p>Noise and Vibration</p>	<p>The impact of aircraft noise and associated road traffic on the tranquillity of the AONB. Increased capacity at the</p>	<p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles from the airport has been undertaken and is</p>

	<p>airport will result in increased numbers of aircraft and road traffic which will increase the noise and activity problems associated with these vehicles, including impacts on rural populations that live in currently tranquil areas and on habitats and wildlife. Tranquillity is identified in the Management Plan as part of the AONB’s natural beauty. It is covered by Objective OQ4 of the AONB Management Plan: ‘To protect and promote the perceptual qualities; with the rational; to ensure that the special qualities people value, such as tranquillity, dark skies, sense of naturalness and clean air, are recognised and taken account of in AONB management’.</p>	<p>presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the High Weald National Landscape experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would remain dominant. The outcomes of these assessments are summarised in detail in the chapters referenced above, and in summary form in the <b>ES Non-Technical Summary</b> <a href="#">[APP-217]</a>.</p> <p>The impact of increases in road traffic noise from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> and <b>ES Appendix 14.9.4 Road Traffic Noise Modelling</b> <a href="#">[APP-174]</a>. The assessment considered traffic noise changes during the peak periods of</p>
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		<p>construction, and in the opening year of the highway scheme, 2032 and 5 years later in 2047. Noise levels were modelled as a result of the new highways changes in the area immediately around the highway works and also on the wider road network covered by the transport assessment.</p> <p>The assessment in ES concludes that with the mitigation committed no significant effects from increases in road traffic noise are predicted either in the vicinity of the highways scheme or on the wider road network, either during construction or operation.</p>
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### 3.44 Home Office

3.44.1 Table 3.44.1 below sets out the Applicant’s response to the issues raised within the RR from the Home Office [[RR-4547](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.44.1 Applicant’s response to the matters raised by the Home Office**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Compulsory Acquisition and Compensation	The Home Office is aware from the application documents submitted by the Applicant, that the Order Limits for the DCO includes Crown Land in which the Home Office has an interest. The Secretary of State cannot make a DCO which includes a compulsory acquisition provision which would have the effect of authorising compulsory acquisition of the third party interest (being an interest held by or on behalf of	<p>The Applicant has consulted with the Home Office both pre and post submission.</p> <p>The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of the Home Office’s undertaking.</p> <p>The Applicant has also produced and issued the requested information from the Home Office to show clearly the land parcels affected.</p>

	<p>the Crown) without the consent of the relevant Crown authority. Currently, the extent of the Home Office's interests and the impacts of the development on them are not fully understood. The Home Office is currently reviewing the Applicant's Book of Reference (BoR) and Crown Land Plans.</p>	<p>The Applicant acknowledges Home Office's objection to the compulsory acquisition powers in respect of the plots which it has an interest in. The Applicant is engaged with the Home Office to agree appropriate terms so it can acquire the new rights for the Leasehold areas by voluntary agreement. The Applicant is seeking the necessary consents with the Home Office under section 135 of the Planning Act 2008.</p>
<p>Compulsory Acquisition and Compensation</p>	<p>Limited consultation Despite provisions being included in the draft DCO in relation to the protection of Crown interests, at this stage there has been very limited consultation with the Home Office and Border Force that we are aware of which details the impacts of the development on Crown land/interests. Given the limited consultation with the Applicant, the Home Office is not currently in a position to consent to any provisions relating to crown land contained in the DCO. The onus should be on Applicant to discuss the proposed scheme with the Home Office as early as possible. Therefore, the Home Office would welcome proactive engagement with the Applicant to discuss fully the proposals and their impact on the Home Office's land interests.</p>	<p>The Applicant is aware of the concerns raised within this Relevant Representation, however, would like to confirm that meaningful consultation has been occurring with The Crown's appointed agent. Further information and consultation has occurred since this Relevant Representation was submitted.</p>

<p>Compulsory Acquisition and Compensation</p>	<p>The Home Office needs commitment from the Applicant that any replacement Border Force facilities will be at least equivalent to the current facilities and fit for purpose and that it will be consulted fully in advance of the project's design freeze to ensure that the design of any replacement facilities are sufficient for the Border Force occupation and operation and fit for purpose. Given the points that have been raised above the Home Office will not consent to the inclusion of compulsory acquisition powers over Crown interests before the full extent of the impact of the DCO on Crown Land is known and sufficient commitment provided.</p>	<p>The Applicant understands the importance of the Border Force facilities, and commits to further consultation with the Crown and their appointed agents to review and assess any replacement facilities as and when these are considered in future detailed design stages.</p>
<p>Compulsory Acquisition and Compensation</p>	<p>The Home Office respectfully requests for the Applicant to provide a clear and exhaustive list of land and interests over which compulsory acquisition powers are sought, and details of any replacement facilities that are to be provided to enable the Home Office to be able to properly assess any impacts on Crown land with a view to being able to properly consider whether to provide its consent</p>	<p>The Applicant has provided an exhaustive list of the Crown Land plots affected by the <b>Draft DCO</b> <a href="#">[AS-127]</a>, in both the <b>Crown Land Plans</b> [and via direct correspondence with the Crown's appointed agent. ], in both the <b>Crown Land Plans</b> <a href="#">[APP-015]</a> and via direct correspondence with the Crown's appointed agent.</p>

	pursuant to section 135(1) of the Planning Act 2008.	
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### 3.45 Horley Town Council

3.45.1 Table 3.45.1 below sets out the Applicant's response to the issues raised within the RR from Horley Town Council [[RR-1741](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.45.1 Applicant's response to the matters raised by Horley Town Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
General - Support	As a commuter town situated close to London and Gatwick Airport, the airport had in the past provided good employment prospects for our residents. However, the local economy has suffered from the short-term and long-term impacts on the aviation industry from the Covid-19 pandemic in respect of job losses both directly and indirectly. We are therefore supportive of the airport re-building its business but by doing so in a way that has the least possible impact on our community and the environment, both now and in the future.	Noted. The Applicant welcomes Horley Town Council's support for the Project.
Water Environment	<b>Flooding</b> The River Mole is located to the western side of Horley, with the Burstow Stream tributary running to the east and northern reaches of the Town. Large areas of Horley are therefore located in Flood Zones 2 and 3a & 3b	<b>Flood Risk</b> GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The model extends approximately 1.5km downstream of the NRP boundary which is considered sufficient



	<p>and at an existing high or medium risk from flooding. Surface Water run-off caused by intense short periods of rainfall affect low lying areas around these streams, including Gatwick and Horley. Any additional development that exacerbates flooding is of great concern to the residents of Horley and Horley Town Council. Crawley Borough Council's Level 1 Strategic Risk Assessment for the Upper Mole Catchment states that 'The provision of buffer strips is important in preserving watercourse corridors, flood flow conveyance and future watercourse maintenance and improvement. It also enables the avoidance of disturbing ecology and the structural integrity of riverbanks'.</p> <p>The SFRA states that 'Developers should:</p> <ul style="list-style-type: none"> <li>• Not build within 12m from the edge of bank of any Ordinary Watercourse within the district</li> <li>• Not build within 8m from the edge of bank of any Main River within the District in accordance with the Environment Permitting Regulations (2016)</li> </ul>	<p>to fully assess any potential downstream effects. The Environment Agency reviewed and accepted the updated baseline model that has informed the NRP <b>ES Appendix 11.9.1: Flood Risk Assessment</b> <a href="#">[APP-147]</a> in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11 Water Environment</b> <a href="#">[APP-036]</a>.</p> <p><b>Buffer Strips and Ecology</b></p> <p>Section 10.6 of the <b>ES Appendix 5.3.2: Code of Construction Practice Annex 1 Water Management Plan</b> <a href="#">[APP-083]</a> lists the measures that would be incorporated to protect the riparian zone during construction. In addition, Table 9.8.1 Mitigation and Enhancement Measures of ES Chapter 9 Ecology and Nature Conservation <a href="#">[APP-034]</a> sets out the following: <i>The</i></p>
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	<ul style="list-style-type: none"> <li>• Seek opportunities on a site-by-site basis to increase these buffer distances to ‘make space for water,’ allowing additional capacity to accommodate climate change’.</li> </ul> <p>Both the River Mole and Gatwick Stream pass close to Gatwick and with GAL’s proposals to build on more land around the current Gatwick area, this means that there are fewer buffer strips available.</p>	<p><i>airfield satellite construction compound would occupy land outside of the River Mole diversion footprint to allow the new river channel to establish early in the Project. A minimum 8 metre buffer would be created along the channel.</i></p> <p><b>ES Appendix 11.9.1: Geomorphology Assessment</b> <a href="#">[APP 142]</a> has been carried out to assess all aspects of the Project that have the potential to impact (directly or indirectly) on the geomorphology of the watercourses within the Project’s redline boundary. These watercourses include the River Mole, Gatwick Stream, Burstow Stream Tributary, Man’s Brook and Crawler’s Brook. This assessment considers the proposed mitigation secured as part of NRP for the water environment during the construction ES Appendix 5.3.2: Code of Construction Practice Annex 1 Water Management Plan <a href="#">[APP-083]</a> and operation Table 11.8.1 in <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> of NRP. This includes mitigation to maintain the structural integrity of the riverbanks. The assessment concludes no environmentally significant effects on the relevant watercourse geomorphology as a result of the NRP.</p>
Water Environment	We understand that the existing airport facilities currently discharge foul wastewater and sewage between two discrete systems, one discharging to Thames Water’s Crawley sewage treatment works and the other into Thames	Modelling of the wastewater sewer system undertaken to inform the <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> demonstrates that with mitigation measures included in the NRP, see Table 11.8.1 of <b>ES Chapter 11 Water Environment</b> <a href="#">[APP-036]</a> , Gatwick Airport’s wastewater network would have adequate capacity to

	<p>Water’s Horley sewage treatment works approximately 6 km to the north of the airport via the trunk sewerage system. HTC note that Horley is a water stress area and the Thames Water Horley Sewage Treatment Works is also at capacity and pending further investment to support growth. We raise concerns that the level of increase in passenger capacity generated by the proposals would push the Horley Sewage Treatment Works over capacity (if it is not already) – particularly as we have raised recent concerns with the Environment Agency (EA) regarding the current leak from the Horley sewage works, near the new Westvale Park development. Furthermore, we note the recent consultation response from Thames Water to new housing proposals in neighbouring Hookwood that Thames Water has “identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal”. Without reinforcement works to the existing network this area is at risk of continued</p>	<p>accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development and they would recoup their costs through infrastructure charges to GAL.</p>
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	<p>sewage flooding and pollution incidents, the likes of which are regularly occurring at other development sites nearby. Whilst we understand from the ES that 'Thames Water will complete an assessment of the impact of an increase in passenger numbers as a result of the Project on water treatment capacity at Crawley and Horley STW and that GAL has engaged with Thames Water', we would urge the decision maker to resist granting consent for such a large project without the utmost confidence that the existing system (plus any yet to be determined mitigation) can actually accommodate such growth. We are supportive that the GAL proposals have sought to identify a potential location for a new treatment works (near the existing Crawley Sewage Treatment Works), should there be insufficient capacity, however, Thames Water and GAL must jointly undertake such an assessment to adequately determine the likely impacts and provide certainty that even with a new Treatment Works there remains enough sewage treatment</p>	
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	capacity for both Gatwick Airport and the future organic growth of the town itself.	
Noise and Vibration	In relation to aircraft noise, Horley Town Council is protected by regulation in the AIP that aircraft departing from Gatwick must not overfly the town. Our southern neighbourhoods are likely to be the most affected by arrivals on westerly operations and departures on easterly operations but neither fly directly overhead. A major new residential development in Horley has been built under one of the NPR's and is not protected by the current AIP regulations.	Noted.
Noise and Vibration	HTC remain concerned about the noise impacts to residents living in Horley South (including the Gardens Estate and Riverside), particularly during the lengthy construction period. Despite mitigation being proposed, a significant number of residents will be impacted for over a decade and subject to construction noise 24/7.	Noise impacts have been predicted based on assumed standard methods of working and that the Best Practicable Means to reduce noise on site are adopted with the use of Section 61 applications through which the Contractor applies to the local authority for prior consent to carry out the works stating all the measures that will be implemented to minimise noise disturbance. Overall, with mitigation the assessment results indicate that there is potential for significant adverse noise effects at approximately 37 properties during the day and approximately 10 during the night in the Longbridge Road,

		<p>Riverside Park area nearest the required highways works. See <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">AS-039</a>] for further information.</p> <p>The <b>ES Appendix 5.3.2: Code of Construction Practice</b> [<a href="#">APP-082</a>] sets out measures to minimise noise and vibration from construction activities, including the requirement for contractors to use quieter machinery and equipment and construction methods which are not inherently noisy.</p> <p>The potential for impacts arising from construction traffic have been assessed as not significant.</p>
<p>Noise and Vibration</p>	<p>We note that the DCO documents indicate that noise insulation schemes may be necessary with an option of temporary re-housing of residents. However, the documentation provides no suggestions on the type &amp; quality of the temporary accommodation, how long for &amp; who will pay for this and associated removal costs, and whether there is a difference between homeowners and tenants. We have concerns regarding this level of mitigation, particularly regarding the “temporary” nature of any rehousing. As the project is likely to take in excess of 10 years to complete, it is questionable</p>	<p>The majority of the impacts that give rise to the highest noise impacts are at night and the impacts expected from the works are over short periods as described in Section 14.9 of <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. The assessment identifies 9 properties in Horley that may qualify for Noise Insulation at Burstow Court, 48a Longbridge Road and at 275 Balcombe Road, and none expected to qualify for temporary rehousing.</p>

	as to whether it can realistically be considered a “temporary situation”.	
Noise and Vibration	<p>We note that GAL has now removed a mitigating noise bund along the A23 boundary with Riverside Garden Park. Whilst we hope that this will enable more of the existing high quality valuable community open space, as well as the mature tree screening along the existing A23 to be retained we remain unconvinced that sufficient noise mitigation has been designed into the scheme for the residents at Riverside and Gardens Estate.</p>	<p>The impact of increases in road traffic noise from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14: Noise and Vibration [APP-039]</b> and <b>ES Appendix 14.9.4: Road Traffic Noise Modelling [APP-174]</b>. The assessment considered traffic noise changes during the peak periods of construction, and in the opening year of the highway scheme, 2032 and 5 years later in 2047. Noise levels were modelled as a result of the new highways changes in the area immediately around the highway works and also on the wider road network covered by the transport assessment.</p> <p>Mitigation measures to reduce road traffic noise are described in Sections 14.8 and 14.9 of <b>ES Chapter 14: Noise and Vibration [APP-039]</b> and include:</p> <ul style="list-style-type: none"> <li>• Noise barriers on the new flyovers to be built at the North and South Terminal roundabouts.</li> <li>• A new right turn at the North Terminal to remove the current need for traffic wishing to turn right instead having to turn left up to the Longbridge Roundabout, round it, and back down the A23 thus reducing traffic flows on this section (past Riverside Garden Park)</li> <li>• A reduced speed limit from 50 to 40mph on the A23 London Road.</li> </ul>

		<p>The assessment in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] concludes that with this mitigation no significant effects from increases in road traffic noise are predicted either in the vicinity of the highways scheme or on the wider road network, either during construction or operation.</p> <p>The need for a further noise barrier within Riverside Garden Park was carefully reviewed and consulted on as summarized in <b>ES Appendix 14.9.4: Road Traffic Noise Modelling</b> [<a href="#">APP-174</a>], and it was found that noise significant increases could be avoided with the mitigation described above without the need for an additional noise barrier in the park.</p>
<p>Noise and Vibration</p>	<p>Noise Envelope Experience from complaints received by the airport in 2019 indicated that the main cause of annoyance was not from an individual aircraft event but the continuous noise from an increase in movements or 'overflights'. Therefore, increasing the number of flights proposed under the DCO has the potential for a massive increase in annoyance to residents and the number of complaints lodged with GAL.</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe</p>



		Road and Peeks Brook Lane to the East.
Noise and Vibration	<p>HTC welcome the introduction of a noise envelope, however, we are concerned about the metrics and contours being used to establish the Noise envelope and what scrutiny there will be once a noise envelope is in place. HTC believe that such scrutiny should be undertaken jointly by the host local authorities to ensure rigorous compliance and that this should be funded by GAL as part of this DCO.</p>	<p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>]. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> [<a href="#">APP-175</a>] which explains some of the options considered and the choices made.</p>
Noise and Vibration	<p>Whilst we understand the need to strike a balance between the negative impacts of noise, such as on health and wellbeing, and the positive economic impacts of aviation, we consider a general principle is to ensure that benefits from future growth are shared between the aviation industry and local communities. As such, the industry should continue to reduce and mitigate noise as airport capacity grows, with the government’s policy on aviation noise consistent with agreed international approaches and relevant European laws. We</p>	<p>Sharing the benefits was discussed in various Noise Envelope Group (NEG) meetings as the noise envelope was being developed. GAL presented its estimates of sharing the benefits to the NEG on 23 June 2022, see <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>] p164 to 175, using the methodology referred to in the Bristol Airport Planning Appeal Decision, Appeal Ref: APP/D0121/W/20/3259234, 2 February 2022. Policy gives no method for assessing the degree of sharing nor the extent that should be shared, and the Planning Inspectors for the Bristol case approved the scheme as consistent with noise policy, whilst noting that 77% of this potential noise benefit was to be taken by ATM growth.</p>

	<p>consider that, to date, benefits have not been shared with the local community, as the noise contours have not significantly reduced over time with the introduction of quieter aircraft. Whilst this could change with the increasing number of NEO's &amp; MAX's in the airline fleets operating from Gatwick, we still remain very concerned.</p>	
Construction	<p>The DCO proposes a Construction Code of Practice which we support. However, we are sceptical that the requirement for construction traffic to use the M23 can be successfully controlled. In particular, any construction traffic using the proposed construction compound along the Balcombe Road as there is currently no access to the south terminal/ M23 spur Road nor is one proposed. It is not clear how GAL propose to manage construction staff traffic not adding to the pressure on local roads particularly in the Horley area surrounding the airport?</p>	<p>The application is accompanied by a Code of Construction Practice and a suite of Annexes.</p> <p>Annex 3 of the CoCP comprises an <b>Outline Construction Traffic Management Plan (oCTMP)</b> [<a href="#">APP-085</a>] which sets out the approach to manage construction traffic during the Project's construction, including suggested construction vehicle routes to and from the main construction compound (Appendix A of the oCTMP). These routes will be confirmed and approved through the detailed CTMP, in line with Requirement 12 of the <b>Draft Development Consent Order</b> [<a href="#">AS-004</a>].</p> <p>Annex 4 of the CoCP comprises an Outline Construction Workforce Travel Plan (oCWTP) which aims to facilitate efficient and sustainable travel options for the Project's construction workforce. The oCWTP puts forward a number of measures which will be refined and approved through the detailed CWTP, in line with Requirement 13 of the Draft</p>

		<b>Development Consent Order</b> <a href="#">[AS-004]</a> .
Construction / Visual / Noise	Whilst we welcome the long-term objective of the proposed road alterations which seek to separate airport traffic from local road traffic, we are concerned about the phasing of these works and the visual/ noise impact of the proposed alterations to the A23/ M23 spur on the residents living in the Horley Gardens Estate.	<p>Please refer to the response above with regards to road traffic noise.</p> <p>Please refer to <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> for details on measures that the Applicant will implement on Air Quality, Noise and Vibration. Please refer to <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> for details on measures that the Applicant will implement on Air Quality, Noise and Vibration. The application also considers the impact of traffic on the local road infrastructure and proposes mitigation measures during the construction period. Please refer to <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> and the Outline Construction Traffic Management Plan contained in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 3 Outline Construction Traffic Management Plan</b> <a href="#">[APP-085]</a> The CoCP sets out a number of measures and system to manage and minimise disturbance arising from the Project's construction activities, including disturbance on surrounding residents and businesses.</p>
Traffic and Transport	We are alarmed to read that the phasing of new road infrastructure is scheduled towards the end of the construction timeline (i.e. after the increase in	Strategic transport modelling has been undertaken for the assessment years of 2029, 2032 and 2047. More detailed microsimulation VISSIM modelling of the roads around the airport has been undertaken for the assessment years of

	<p>passenger numbers). This is unacceptable to Horley Town Council as the existing road network is unlikely to have sufficient capacity to cope with the additional traffic. We would advocate for trigger points, based upon passenger numbers which will require certain new infrastructure to be in place and ask that this be given due consideration.</p>	<p>2032 and 2047, with and without Project. As set out in Chapter 13 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>, the VISSIM modelling indicated that without the Project in the future baseline scenarios, the network would begin to operate close to capacity in several locations. The inclusion of the highway works as part of the Project prevents unacceptable highway conditions arising once the Project is in place.</p> <p>Based on the modelling work, the Project is not expected to result in significant adverse impacts which require mitigation additional to the highway works already proposed.</p>
<p>Traffic and Transport</p>	<p>We note that the M23 Spur Bridge over the Balcombe Road is likely to require substantial works to facilitate the proposed access improvements. However, limited information has been provided to determine what impact that could have on the free flow of traffic along the Balcombe Road, an important route for residents into and out of Horley.</p>	<p>The nature of work and indicative construction methodology including indicative temporary traffic management measures required to construct Balcombe Road Overbridge are described in Section 7.4 of the <b>Environmental Statement Appendix 5.3.1: Buildability Report - Part B - Part 1</b> <a href="#">[APP-080]</a>.</p> <p>A 3D visualisation of the construction sequence of Balcombe Road Overbridge can also be found as part of Appendix H of <b>Environmental Statement Appendix 5.3.1: Buildability Report - Part B - Part 2</b> <a href="#">[APP-081]</a>.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice Annex 3 - Outline Construction Traffic Management Plan</b> <a href="#">[APP-085]</a> provides additional details on the proposed</p>

		<p>approach for managing construction traffic during the construction.</p> <p>Section 15.5 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] provides details on the assessment of traffic impacts during the construction phase of the surface access highways works.</p>
Construction	<p>HTC seek clarification on the duration of any works needed and any potential diversion routes, alongside the phasing of these works in relation to the wider construction phasing.</p>	<p>Please refer to the indicative construction sequencing contained in <b>ES Appendix 5.3.3: Indicative Construction Sequencing</b> [<a href="#">APP-088</a>].</p>
Traffic and Transport	<p>We have also been advised that the planned funding for major rail infrastructure improvements in the Croydon area (e.g. Windmill Junction) has been re-assigned and there is no indication when funding might be available in the future. This will mean the current Brighton Main Line will have to cope with a massive increase in demand from passengers [as forecast by GAL] and staff on the airports only rail link to the capital.</p>	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. Paragraphs 9.4.20 to 9.4.25 outlines the Croydon Area Remodelling Scheme (CARS). There is currently no complete funding commitment to deliver CARS at this stage and therefore it has not been included in the strategic modelling work in the future baseline or with Project.</p> <p>The rail assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project. Where standing is expected, spare standing capacity would remain available. The rail crowding assessment indicates that no additional mitigation is required. The assessment highlights that rail services are typically busiest northbound towards London in the</p>

		<p>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.</p>
<p>Traffic and Transport</p>	<p>North Terminal Roundabout The proposed new traffic light controlled junction along the A23 London Road, enabling traffic to exit the North Terminal, is welcomed as this could reduce the traffic currently having to use the Longbridge Roundabout to head south on the A23 towards Crawley. That said, we note that this junction is only for traffic exiting the North Terminal &amp; provides no access for traffic heading southbound on the A23 (from Horley) which will have to, as currently, access the North Terminal via the South Terminal Roundabout &amp; Airport Way. Horley Town Council (HTC) consider that the phasing of the traffic lights at this new junction will be critical, especially in peak times, to avoid queuing back into the Longbridge Roundabout. Similarly the distance between the North Terminal Roundabout and the new junction seems short which could result in traffic</p>	<p>This is noted and detailed microsimulation VISSIM modelling work has been undertaken with and without the highway improvement works to confirm the operation of the proposals, as set out in Chapter 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>].</p>

	queuing back to the roundabout.	
Traffic and Transport	<p>Longbridge Roundabout</p> <p>The widening of the A23 London Road to '3' lanes approaching the Longbridge Roundabout heading north is welcomed, however, the bridge widening to accommodate this is of concern with the potential for considerable traffic disruption. Surface Access General Comments HTC acknowledge the proposed highway alterations along the A23 and at the Longbridge Roundabout to provide additional capacity in and around the airport, however, we are also concerned about the resultant impact on the capacity of the local "feeder" roads and likely traffic congestion which do not benefit from any improvement or capacity building under the current proposals to cope with the increase in demand generated by the growth of the airport.</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]). Based on the modelling work, the Project is not expected to result in significant adverse effects which requires mitigation additional to the highway works already proposed.</p>
Traffic and Transport	<p>Furthermore, Surrey County Council's new Local Transport Plan 4 seeks ambitious targets to promote sustainable transport over the private car with a new hierarchy for road transport</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]). Based on the modelling work, the Project is not expected to result in significant adverse</p>

	<p>of “avoid, shift, improve” in order to meet the Council’s commitment to achieving net zero carbon emissions by 2050. HTC remain unconvinced that GAL have sufficiently addressed the impact on the wider local highway network that will be impacted both during construction and in the longer term once the airport has reached its targeted capacity. Whilst the ongoing commitment to support local bus &amp; coach services locally is supported, HTC wish to see that additional investment is also targeted at new bus services from areas currently without any, as well as increasing the frequency of existing services to include a wider spread of services time wise throughout each weekday and particularly at weekends (in areas such as Westvale Park).</p>	<p>effects which requires mitigation additional to the highway works already proposed.</p> <p>Chapter 5 of <b>ES Appendix 5.4.1: Surface Access Commitments (SACs) document</b> [<a href="#">APP-020</a>] sets out funding commitments towards bus and coach services. Routes have been identified which are considered to most likely make the greatest difference to mode shares. These are included in the strategic transport model to achieve the mode shares assessed as part of the Application. GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other services if it results in an equivalent level of public transport accessibility.</p>
<p>Traffic and Transport</p>	<p>HTC are concerned that GAL are not providing an indication of a timeline for the delivery of all the proposed highway works. As we commented previously HTC are concerned that the phasing of new road infrastructure will be scheduled towards the end of the Northern</p>	<p>Strategic transport modelling has been undertaken for the assessment years of 2029, 2032 and 2047. More detailed microsimulation VISSIM modelling of the roads around the airport has been undertaken for the assessment years of 2032 and 2047, with and without Project.</p> <p>As set out in the <b>Transport Assessment</b> [<a href="#">AS-079AS-079</a>], the</p>



	<p>Runway Project (and after the increase in passenger numbers). HTC request that a Construction Phasing Plan is provided as part of the DCO and not just a Construction Travel Plan, that way HTC can be satisfied that appropriate modelling and mitigation has been considered throughout a phased construction period and that vital infrastructure is in place prior to passenger growth. In relation to passenger growth, HTC note that the expected level of growth is comparable with passenger numbers at Heathrow (a 5-terminal airport, supported by several rail services, bus and coach connections, and major arterial road network) yet even with the proposed Northern Runway Project the airport does not have anywhere near the comparable infrastructure of Heathrow. HTC therefore question whether such growth can ever be considered sustainable given the limitations on infrastructure.</p>	<p>highway modelling indicates that the highway network would continue to operate satisfactorily until the assessment year of 2032, taken as the third anniversary of dual runway operations commencing. <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076AS-076</a>] assesses the effects of the Project in both 2029 and 2032 and concludes that in 2029, prior to completion of the highway works, there would be no significant adverse effects and no mitigation is required. The completion of the highway works by 2032 prevents unacceptable highway conditions arising beyond that date when the Project is in place</p> <p>Based on the modelling work, the Project is not expected to result in significant adverse effects which requires mitigation additional to the highway works already proposed.</p>
<p>Traffic and Transport</p>	<p>Car Parking We understand that GAL are now proposing a reduction in the level of on-site car parks. Whilst HTC support more</p>	<p>The Project will provide an overall net increase of 1,100 spaces on-airport.</p> <p>The Examining Authority has made a Procedural Decision dated 24 October</p>

	<p>sustainable modes of transport we remain concerned that limiting car parking at the airport will continue to place pressure on the local residential roads that are currently exploited by holiday makers travelling through Gatwick. HTC also wish to understand whether GAL have modelled how passengers access the airport in the post COVID pandemic world. Given car usage increased during the pandemic to avoid disease transmission, HTC question whether passenger behaviour will have changed permanently in favour of the private car. If this is the case, then the level of car parking provision should be reconsidered to ensure adequate provision is available. Furthermore, and perhaps of greater significance, is the proposed pricing structure of car parking at Gatwick. Essentially, if airport parking fees are set too high then the level of onsite parking is somewhat irrelevant as users will be forced to park in local streets. Again, HTC would question whether such passenger growth can be supported given the limitations for sustainable</p>	<p><b>2023 Notification of Procedural Decisions</b> [<a href="#">PD-006</a>] to request the Applicant to account for COVID-19 in the transport modelling. A full submission response was submitted to the Examining Authority (Accounting for COVID-19 in Transport Modelling [<a href="#">AS-121</a>]).</p> <p>Car parking charges are used as a mechanism to discourage travelling to the airport by car and to make the sustainable travel modes more attractive. The strategic modelling work includes assumptions on future car parking charges, which are set out in Chapters 6 and 7 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] for the future baseline and with Project, respectively.</p> <p>GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] sets out GAL’s commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.</p>
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	<p>transport modes given the wide catchment area of travellers using the airport.</p>	
<p>Air Quality</p>	<p>The Horley AQMA includes an area of the southwest of Horley to the north of the airport, including Riverside Garden Park. The AQMA was designated for exceedances of the annual mean NO<sub>2</sub> air quality standard. Whilst the ES would suggest that air quality will remain comparable to baseline levels, vehicle emissions across the UK are improving due to improvements in technology which has seen air quality dramatically improved – for example, we understand that air quality in Hooley, to the north of the borough (almost entirely caused by vehicles previously) has dramatically improved in the last couple of years. We feel it is unfair for Horley residents not to benefit from the improvements in air quality being enjoyed by almost all other parts of the UK as a result of these proposals which are merely seeking to keep air quality at or around existing baseline levels. We understand that at the time of writing the ES, no specific emission factors are</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) in Horley AQMA following the methodology agreed with the local authorities. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>A summary of impacts within Horley AQMA is discussed and reported in Section 13.10 of <b>ES Chapter 13: Air Quality for all construction and operation scenarios</b> <a href="#">[APP-038]</a>. The highest annual mean NO<sub>2</sub> concentrations predicted within Horley AQMA are below the annual mean NO<sub>2</sub> air quality standard for all scenarios.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a>. The assessment considered the emerging scientific understanding of UFPs as a public health issue. The approach follows IEMA 2022 guidance on assessing human health effects in EIA.</p>

	<p>available to allow quantitative assessment of ultrafine particles. While currently there are no regulations controlling ultra-fine emissions, there is growing concern that they are dangerous.</p>	
Air Quality	<p>We recognise that aircraft are a key source of ultra-fine particles and we understand that there are currently areas of Horley near the airport that have ultra-fine particulate levels in the air comparable to that seen in central London. We therefore consider that an assessment on ultra-fine particles should be included.</p>	<p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] section 18.8. The approach follows IEMA 2022 guidance on assessing human health effects in EIA. 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 has been scrutinised by the UK Health Security Agency and the Department of Health and Social Care Office for Health Improvement and Disparities and they agree with the conclusion that the Project should not result in any significant adverse impact on public health.</p>
Air Quality	<p>We understand that the WHO published revised guidance on air pollution in September 2021, which recommends a reduction in annual average nitrogen dioxide concentration to 10ug/m3. Given that levels around the airport are anticipated to be significantly above this level,</p>	<p>The World Health Organization (WHO) global air quality guidelines are not currently part of UK legislation or policy, so the thresholds used to assess the Project have followed those in national legislation. Until such thresholds are changed, which may or may not reflect the WHO Guidelines, the air quality assessment is undertaken in accordance with current legislation which is consistent with policy</p>

	<p>we request that GAL undertake further assessment and mitigation to address the revised WHO guideline value.</p>	<p>standards. The methodology used to determine the significance of air quality impacts is detailed in <b>ES Chapter 13: Air Quality</b> [APP-038] Section 13.5.</p> <p>The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [APP-038] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
<p>Greenhouse Gases</p>	<p>The GAL proposals appear to place significant reliance on Sustainable Aviation Fuel (SAF) and we would question how achievable this is – will a supply of SAF be in place to meet demand? Notwithstanding this, the use of SAF raises its own climate change concerns as the majority are from plant-based sources associated with the potential destruction of rain forests to create more land for crop growing alongside competing for land growing crops for human consumption.</p>	<p>The modelling approach follows the assumptions contained within the Jet Zero Strategy as to the rate of SAF and other technological development - but it is explicitly noted within Jet Zero that the precise balance of technologies cannot be determined at this time. This is precisely why the UK Government has adopted its proposed approach - which is to set a trajectory for the sector and to review progress periodically - making changes to the policy and regulatory framework in future should this be needed. As stated in the UK Government's most recent response to the Committee on Climate Change (2023):</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>Greenhouse Gases</p>	<p>If Gatwick's air traffic expands at the rate suggested in the DCO, Gatwick's CO2 emissions will contribute to a significant proportion of the Government's total aircraft CO2 emissions for the whole of the UK. This seems contrary to the Government’s “Levelling Up” Strategy whereby concentrating so much air traffic south of London could impact the economic and environmental sustainability of other UK airports, especially northern ones, if the broader Government target for aircraft CO2 emissions is to be taken seriously.</p>	<p>The are two points to make in response:</p> <ul style="list-style-type: none"> <li>• GAL’s forecasts do not rely upon the South East achieving a greater share of the UK aviation market.</li> <li>• The Government’s analysis is that its Net Zero commitments can be met consistent with the growth in aviation anticipated as a result of its policy support for a third runway at Heathrow and making better use of other airports, including Gatwick.</li> </ul>

<p>Greenhouse Gases</p>	<p>Furthermore, it could be argued that not all CO2 emissions are equally important or valuable - if the UK Government are serious about achieving carbon net-zero by 2050, is there a justifiable need to be generating CO2 on non-essential short-haul flights vs. CO2 emitted to heat homes or for food production.</p>	<p>Government aviation policy set out in the ANPS and elsewhere recognises the importance of short and long haul international connectivity.</p>
<p>Need and Forecasting</p>	<p>Horley Town Council supports the build back of Gatwick Airport and associated economic benefits associated with this. We would, however, question the demand forecast for such levels of passenger growth and whether airlines will grow back above pre-Covid levels, so thereby query the need for the Northern Runway proposals.</p>	<p>Gatwick Airport Limited is grateful for the support from the Town Council for the recovery of Gatwick from the impact of pandemic. GAL recognises the importance of the role of the airport in the local economy and the local community.</p> <p>The Town Council doubts the ability for Gatwick to grow back beyond pre-Covid levels. However, extensive documentation has been submitted with the application to set out the <b>Needs Case</b> [APP-250], taking account of available forecasts for growth, operational and airline demand etc.</p> <p>The Town Council may find it helpful to consult a recent Topic Paper prepared by GAL as part of its Statement of Common Ground discussions with the host local authorities. The <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6) draws together a number of issues relevant to representations. Included is the demonstration that Gatwick is</p>

		<p>already subject to greater demand than its current capacity.</p> <p>There is strong evidence to suggest the major airlines are planning to serve the future levels of demand being forecast by the UK Government.</p> <p>For example, easyJet have over 200 aircraft on order and are expecting their seat capacity to increase by nearly 60% in under 10 years.</p> <p>Ryanair and Wizz have even greater growth ambitions with over 500 hundred fleet on order from these two airlines combined. They will provide for fleet replacement as well as significant growth capacity.</p> <p>Gatwick has a clear case both from an operational resilience perspective and taking account of market needs and demands for the NRP now and it intends to bring forward the project as soon as practical, if DCO consent is granted.</p>
<p>General - Support</p>	<p>Under permitted rights GAL have forecast that over 62 million passengers can be accommodated by more intensive use of the main runway. This alone could be considered a significant increase over the 2019 passenger numbers. Historically the Town Council has supported Gatwick's growth based upon a one runway/two</p>	<p>Noted. The Applicant welcomes Horley Town Council's support for the Project.</p>



	terminal approach and this remains the case.	
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### 3.46 Horsham Trafalgar Neighbourhood Council

3.46.1 Table 3.46.1 below sets out the Applicant's response to the issues raised within the RR from Horsham Trafalgar Neighbourhood Council [[RR-1743](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.46.1 Applicant's response to the matters raised by Horsham Trafalgar Neighbourhood Council**

Topic	Matter raised in the RRs	The Applicant's response
General - Opposition	Horsham Trafalgar Neighbourhood Council (HTNC) is very concerned that the expansion of the Airport will negatively impact the Trafalgar Neighbourhood and HTNCs position is to oppose additional runway capacity.	Noted.
Noise and Vibration	a) impacts on noise (the proposal will impact the residents of Trafalgar Neighbourhood due to an increase in exposure to aircraft noise during the day and night) and therefore increased stress levels	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [ <a href="#">APP-039</a> ]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on

		Balcombe Road and Peeks Brook Lane to the East.
Air Quality	b) increased air particulate pollution from planes and traffic with its health implications for residents	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
Ecology and Nature Conservation	c) impacts that reduce biodiversity as the pollution affects wildlife (eg the rare stag beetles whose spiracles are blocked)	<p>The impact of changes in air quality on ecology receptors is described in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>. This concludes that no significant adverse effects are likely.</p> <p>There is no accepted methodology to assess impacts to stag beetles from changes in air pollution. However, they are a species of woodland and effects of changes in air quality on this habitat type are described in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>. This concludes that no significant adverse effects are likely.</p>

<p>Greenhouse Gases</p>	<p>2. The Greenhouse Gas (GHG) Assessment fails to consider all risks and has been reported (by Horsham District Council to HTNC) to include fundamental errors which could increase total emissions by 20% (ie millions of tonnes of CO<sub>2</sub>e are not accounted for). This needs to be correctly reported. It is assumed that this will impact the climate change resilience assessment for the expansion of the Airport.</p>	<p>The submission does not make clear the reasoning behind the purported 20% under-reporting, although based on similar comments from other parties it is most likely that this has been interpreted as under-reporting based on the exclusion of Well-to-Tank emissions associated with the use of fossil fuels.</p> <p>The assessment does not seek either to develop a Corporate Reporting Account (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project – the methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment. It is not debated that Well-to-tank emissions arise in the supply chain for fuels and methodologies for estimating these (as an uplift to direct emissions) are well established.</p> <p>However, the approach adopted is based on the assessment process which is contextualising emissions against a) the UK carbon budget and b) the Jet Zero Strategy. The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years<sup>1</sup>) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero commitment. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For</p>
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		consistency across the assessment methodology it has also been removed from other aspects of the GHG assessment <sup>3</sup> .
Traffic and Transport	3. HTNC does not believe the existing infrastructure, particularly road and rail, is adequate for the increased numbers that will use the Airport. Areas surrounding the Trafalgar Neighbourhood already suffer from road congestion.	Strategic transport modelling work has been undertaken to assess the traffic impact of the Project as set out in Chapters 12 of the <b>Transport Assessment [AS-079]</b> . A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment [AS-079]</b> . Based on the modelling work, the Project is not expected to result in significant adverse traffic or rail-based effects which require mitigation additional to the highway works already proposed.

### 3.47 Horsmonden Parish Council

3.47.1 Table 3.47.1 below sets out the Applicant’s response to the issues raised within the RR from Horsmonden Parish Council [[RR-1744](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.47.1 Applicant’s response to the matters raised by Horsmonden Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
General	The Parish Council are not against the expansion of the northern runway but would object to any increase in over flying to Horsmonden.	Noted. The Project does not require any changes to flight paths.

<sup>3</sup> Ref: <https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes>

### 3.48 Icelandair

3.48.1 Table 3.48.1 below sets out the Applicant’s response to the issues raised within the RR from Icelandair [[RR-1800](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.48.1 Applicant’s response to the matters raised by Icelandair**

Topic	Matter raised in the RRs	The Applicant’s response
General - Support	Icelandair supports the plans of bringing Gatwick airports Northern Runway into routine use and thereby make a better use of the existing airport infrastructure and add resilience to the current operation.	Noted. The Applicant welcomes Icelandair’s support for the Project.

### 3.49 JetBlue Airways

3.49.1 Table 3.49.1 below sets out the Applicant’s response to the issues raised within the RR from JetBlue Airways [[RR-2060](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.49.1 Applicant’s response to the matters raised by JetBlue Airways**

Topic	Matter raised in the RRs	The Applicant’s response
General – Support	JetBlue supports the addition of the proposed Northern Runway. It is likely that we will want to increase our service level at London Gatwick in the coming years and adding another runway will provide more opportunity to do so.	Noted. The Applicant welcomes JetBlue Airways’ support for the Project.

### 3.50 Kirdford Parish Council

3.50.1 Table 3.50.1 below sets out the Applicant's response to the issues raised within the RR from Kidford Parish Council [[RR-2459](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.50.1 Applicant's response to the matters raised by Kirdford Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
General – Opposition	As a Local Parish Council we are totally opposed to a 2nd runway at Gatwick.	Noted.
Socio-Economics and Economics, Noise and Vibration, Air Quality and Greenhouse Gases	Flights will increase from 285,000 to 386,000, passenger numbers will increase from 46.6m to 76m, new areas will be overflowed by the increased number of flights, there will no increased infrastructure expenditure to benefit the community (apart from a new flyover in front of the airport and some junctions including one in the Croydon area) certainly nothing that will benefit our area of West Sussex which is already plagued by excessive overflights, no investment is being made in the railway line or residential roads when the line to Gatwick that passes through our local railway station (Billingshurst) is already at capacity, air quality is expected to be breached from the outset, and there is no account being taken of the climate emergency as	<p>The Environmental Statement (ES) includes a robust assessment of impacts and results as identified under <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>], <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] and <b>ES: Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>].</p> <p>GAL is proposing a new community fund secured through the draft DCO S106 Agreement. The aim is to merge the Gatwick Airport Community Trust and the Gatwick Foundation Fund to create this new community fund. This new fund will have similar aims and will be dedicated to supporting local communities through the funding of projects within those communities most affected by the airport operations (Section 17.2 of <b>ES Chapter 17: Socio-Economic</b> [<a href="#">APP-042</a>]).</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by</p>

	<p>declared by several local councils.</p>	<p>comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in <b>ES Paragraph 16.10.4 of ES Chapter 16 Greenhouse Gases [APP-041]</b> that references the IEMA Guidance noting that “<i>The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.</i>”</p> <p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration [APP-039]</b>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge</p>
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		Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.
Capacity and Operations	Far from building new runways, we should be restricting the number of flights going in and out of Gatwick.	The <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the policy justification for growth at Gatwick. The application is also accompanied by a <b>Needs Case</b> <a href="#">[APP-250]</a> to justify the airport's expansion.

### 3.51 Leigh Parish Council

3.51.1 Table 3.51.1 below sets out the Applicant's response to the issues raised within the RR from Leigh Parish Council [\[RR-2520\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.51.1 Applicant's response to the matters raised by Leigh Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
General - Opposition	The Parish Council and parishioners of Leigh object to the proposal to expand Gatwick Airport for the following reasons.	Noted.
Noise and Vibration	1. Aircraft noise. Leigh parish is directly under the arrivals flight path and already suffers from intolerable aircraft noise. Any expansion of the airport would increase aircraft noise further. Night flights. A ban on night flights should be a condition of any expansion at Gatwick. The airport should also be required to set out a comprehensive package of measures to incentivise the use of the quietest aircraft at	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a> . Increased



	<p>night outside the hours of a ban</p>	<p>aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p>
<p>Greenhouse Gases</p>	<p>2. Pollution. Expansion of Gatwick Airport on the scale proposed would increase very substantially the CO2 emissions and other climate impacts associated with the airport's operations and flights.</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed. The impact of these changes has been assessed in line with relevant regulations and guidance as set out in <b>Section 16.4 the ES Chapter 16 Greenhouse Gases</b> [<a href="#">APP-041</a>]. Specifically, this includes the updated guidance from IEMA on Assessing</p>

		<p>Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. 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. 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</i></p>
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		<p><i>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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<p>Planning and Policy</p>	<p>No need. Gatwick Airport’s overall case for expansion does not comply with the Airports National Policy Statement which requires airports (other than Heathrow) to demonstrate sufficient need to justify their expansion proposals, additional to / different from the need which would be met by the provision of a Northwest Runway at Heathrow.</p>	<p>Substantial documentation has been submitted with the DCO Application to demonstrate the need for the NRP. Notably, very few representations engage with the detail of the submitted case or with the demonstrable need to provide more capacity. Gatwick has the world’s busiest (daytime) single runway and a documented waiting list from airlines for more slots. It has a clear need for additional operational capacity and resilience <b>today</b> and all forecasts show that need will increase.</p> <p>The relevant paragraph of the ANPS for these purposes is paragraph 1.42 which provides:</p> <p><i>“As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application’s individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure</i></p>

		<p><i>as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>No conflict arises with the ANPS, therefore, from seeking DCO consent for more intensive use of Gatwick Airport – in fact, the ANPS recognises that “<i>it may well be possible</i>” to make the case for such growth, although each application will have to go through the relevant process and to be considered on its merits.</p> <p>The merits of the case for the NRP are set out extensively in the application documents; notably in the <b>Planning Statement</b> [APP-245] and the <b>Needs Case</b> [APP-250], supported by the <b>Forecast Data Book</b> [APP-075]. It would not be productive to set the case out again here but there are some specific issues raised in the representations which are responded to here.</p>
Landscape, Townscape and Visual	The proposed expansion of Gatwick Airport would have a huge adverse environmental effect on our community in the Green Belt and High Weald AONB.	Section 8.9 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [APP-033] describes the impacts on landscape and townscape character and visual amenity during the daytime and at night as a result of an increase in built form and concentration of lighting at the airport

		<p>within an urban and rural setting and the influence on the perception of tranquillity due to overflying aircraft (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of the <b>ES Noise and Vibration Part 1</b> <a href="#">[APP-062]</a> together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the High Weald National Landscape experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be apparent.</p>
Noise and Vibration	A ban on night flights should be a condition of any expansion at Gatwick.	The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The

		<p>Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline.</p>
<p>Greenhouse Gases &amp; Air Quality</p>	<p>Climate change and air pollution. Any expansion on the scale proposed at Gatwick will increase the CO2 emissions and other climate effects associated with increased operations and flights. Expansion of Gatwick would therefore have a material impact on the UK's ability to meet its carbon reduction targets. Carbon emissions will also result from construction works and increased road traffic to the airport. Flights and traffic will make air pollution worse.</p>	<p>An assessment of changes to air quality and greenhouse gases due to the Proposed Development is provided in <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] and <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>].</p> <p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local authorities. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Please see the response above relating to the approach taken to</p>

		assessing impacts from GHG emissions.
Traffic and Transport	<p>The Parish of Leigh is already subject to significant speeding traffic using the village as a cut through from the M25 by airport users coming from the west of the County and the west of London, thus avoiding the relentless traffic hold-ups between Junction 9 and the M23. Gatwick’s targets to increase the use of bus and train links are insufficient to prevent a massive increase in road traffic. This increase in traffic will significantly increase congestion on local roads. It is essential for the safety of those living in small villages around the airport to be protected both from speeding road traffic and increased pollution, that road planning is required to ban through road access to the airport or at the very least actively discourage it.</p>	<p>Strategic transport modelling work has been undertaken to assess the traffic impact of the Project as set out in Chapters 12 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The extent of the model includes the area covered by Leigh Parish Council. The airport is well located to the strategic highway network and a large majority of the trips are expected to use the M23 Spur and the M23. Based on the modelling work, the Project is not expected to result in significant adverse effects to the Parish of Leigh which requires mitigation.</p> <p>As set out in commitment 14 of the <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a>, GAL will set aside a Transport Mitigation Fund (TMF) to give assurance that resource will be available for additional interventions in support of the commitments, or to provide mitigation of an unforeseen or unintended impact from the Project. The intention of this fund is to support further interventions in the area surrounding the Airport should they be necessary as a direct result of the Project. This may relate to physical infrastructure, changes to public transport services or facilities off-airport. Requests for and decisions on allocation from the TMF would be addressed through the Transport Forum Steering Group (TFSG) and sub-groups of it.</p>

<p>Water Environment</p>	<p>The Parish of Leigh, surrounded by the river Mole, already has flooding problems particularly around the discharge of sewage. Over the years the River Mole and its tributaries have flooded, especially when the Airport and sewage treatment plants discharge water in extreme events. Climate change is making these extreme events more frequent and severe. Expansion of the Airport, and other developments locally, need to properly take this into account.</p>	<p><b>Flood Risk</b></p> <p>GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The Environment Agency reviewed and accepted the updated baseline model that has informed the NRP Flood Risk Assessment <b>ES Appendix 11.9.6: [APP-147]</b> in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA <b>ES Appendix 11.9.6 [APP-147]</b> also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11 Water Environment [APP-036]</b>.</p> <p>As part of the NRP, approximately a 300m stretch of the River Mole downstream (north) of the runways will be renaturalised that will introduce a</p>
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		<p>two-stage channel that will provide additional flood storage capacity and biodiversity benefits, similar to the stretch immediately downstream of this location to the north-west of the airport.</p> <p><b>Wastewater</b> Modelling of the wastewater sewer system undertaken to inform the <b>ES Chapter 11: Water Environment [APP-036]</b> demonstrates that with mitigation measures included in the NRP see Table 11.8.1 of <b>ES Chapter 11: Water Environment [APP-036]</b> the Gatwick wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its license as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development</p>
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		and they would recoup their costs through infrastructure charges to GAL.
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### 3.52 Lewes District Council

3.52.1 Table 3.52.1 below sets out the Applicant’s response to the issues raised within the RR from Lewes District Council [[RR-2542](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.52.1 Applicant’s response to the matters raised by Lewes District Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Greenhouse Gases	Lewes District Council object to this in principle given the increase in emissions that would result.	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>Regulation of emissions beyond GAL’s control, however, is a matter on which the Government has established a clear policy in line with its commitment to achieve Net Zero by 2050.</p> <p>That policy is set out in the Government’s Jet Zero Strategy (the JZS). There the Government sets out how it will apply a range of market mechanisms, regulations and investments to stimulate the use of new fuels and technology to ensure that aviation emissions will reduce in line with a trajectory which is consistent with the Net Zero commitment. The Government is proactively monitoring performance against that trajectory and will intervene further if necessary to ensure its commitments are met.</p>

		<p>In its Response to the report of the Climate Change Committee in October 2023, the Government summarised the position as follows:</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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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<p>Greenhouse Gases</p>	<p>Lewes District Green Party strongly with the proposed expansion in aviation at Gatwick Airport which is wholly incompatible with action to achieve net zero, and we would like to register as an interested party. Ability to achieve net zero targets: Expansion of Gatwick would have a material impact not just on the UK's ability to meet its carbon reduction targets but Lewes district's ability to reach net zero by 2030, which was committed to via a Lewes District council motion in 2019, plus similar motions by several of our town and parish councils Expansion on the scale proposed would increase substantially the CO2 emissions and other climate effects associated with Gatwick's operations and flights . There are currently no proven technologies for reducing aviation emissions at scale.</p>	<p>It is noted that various local authorities have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in <b>ES Paragraph 16.10.4 of ES Chapter 16 Greenhouse Gases [APP-041]</b> that references the IEMA Guidance noting that <i>“The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.”</i></p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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</i></p>
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		<p><i>review will be in 2027, five years after publication of the Strategy in 2022. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<p>Traffic and Transport &amp; Air Quality</p>	<p>Expansion of Gatwick would have a detrimental Impact on traffic and associated air quality issues in our district. An increase from 46 million passengers in 2019 to 80 million passengers per annum (over 70% growth) will inevitably increase congestion. Many roads are congested and the A27 Ashcombe roundabout is</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources), reflecting the assumptions and outputs of the Transport Assessment. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment</p>

	<p>identified as ‘under stress’ by Highways England already. Should there be an expansion in passenger number we would expect substantial investment in public transport to be required, to enable both train and bus travel by residents in our district</p>	<p>concludes that the impact of the Proposed Development would not be significant.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [APP-038] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Strategic transport modelling work has been undertaken to assess the traffic impact of the Project as set out in Chapter 12 of the <b>Transport Assessment</b> [AS-079]. Based on the modelling work, the Project is not expected to result in significant adverse effects in the Lewes area which will require mitigation.</p>
<p>Noise and Vibration</p>	<p>Increasing noise pollution: an increase from 281,000 aircraft movements in 2019 to 386,000 aircraft movements per annum (over 35% growth) would exacerbate noise pollution to residents including tranquil rural areas, and negatively impact the tranquillity of the South downs national park.</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> [APP-039]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge</p>

		<p>Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs and the South Downs National Park is assessed in <b>ES Chapter 8 Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>]. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived</p>
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### 3.53 Limpsfield Parish Council

3.53.1 Table 3.53.1 below sets out the Applicant’s response to the issues raised within the RR from Limpsfield Parish Council [[RR-2557](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.53.1 Applicant’s response to the matters raised by Limpsfield Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration	Our primary concerns relate to the potential for increased aircraft noise, particularly in the south of the Parish	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment

		<p>includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Limpsfield will not be significantly affected by the Project. It currently has, and will have with the Project in all assessment years, noise levels below the day and night Lowest Observable Adverse Effects Levels (LOAELs), below N65 20 and below N60 10 3.at night as can be seen on the online Air Noise Viewer the link to which is provided in paragraph 14.9.80 of <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>.</p>
Greenhouse Gases	The impact of CO2 emissions on our Parish	It is noted that various stakeholders have their own commitments and reductions trajectories and their own local concerns. However, for greenhouse gas, the receptor is the global environment. As other responses have explained, the Government has legally binding commitments to achieve Net Zero. In line with that commitment, the



		<p>government is taking steps to monitor and ensure that aviation can only grow within a trajectory which is consistent with Net Zero. This strategy is being implemented through a wide range of market and other measures to regulate aviation related carbon. The Government has confirmed that it's modelling demonstrates that it is not necessary to limit the growth of airport capacity.</p> <p>The Applicant has tested the significance of the impacts arising by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p>
Traffic and Transport	<p>With regards to transport and traffic, the effects of increased traffic and congestion on the A25, A22 and other roads in and bordering our parish, which are already under a lot of strain. We thank you for the opportunity to submit our views.</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment [AS-079]</b>). Based on the modelling work, the Project is not expected to result in significant adverse effects which requires mitigation additional to the highway works already proposed.</p>

### 3.54 Lingfield Parish Council

3.54.1 Table 3.54.1 below sets out the Applicant's response to the issues raised within the RR from Lingfield Parish Council [[RR-2583](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.54.1 Applicant's response to the matters raised by Lingfield Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
Noise and Vibration	The residents, however, have been subjected to a steady	The impact of aircraft noise from the Project during the day and at night has

	<p>increase in the number of flights both during the day and because of the generous allowance Gatwick has for night flights, arrivals all through the night as well. This number peaked in 2019 but is almost back to that peak since the disruption caused by the Covid Pandemic. Departures are noisier and despite the predominant wind direction being south westerly, over the last few years there has been a larger proportion of flights departing to the east, sometimes almost half the departures over a period of several months, as seen in the Gatwick Airport Ltd Noise Quarterly Reports. With the departing aircraft vectored by air traffic control to get onto their routes as quickly as possible, the increased noise of aircraft turning as they are taking off, is spread across Lingfield and the surrounding countryside.</p>	<p>been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>A new noise insulation scheme will be launched to ensure that significant effects on health and quality of life at night are avoided. Many interested parties have noted the need to keep windows closed to keep noise out to avoid sleep disturbance and the problems associated with doing this in the warmer summer. The new noise insulation scheme will offer acoustic ventilators to approximately 4,300 homes to help residents close their windows with ventilation if they choose. Lingfield lies within the area covered by the scheme. See <b>ES Appendix 14.9.10 Noise Insulation Scheme</b> <a href="#">[APP-180]</a>.</p> <p>The noise assessment assumes the long term average runway modal split</p>
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		for future operations, of 75% westerly 25% easterly for the summer season, and 68% westerly / 32% easterly annually see <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a> and a sensitivity analysis of this varying is provided in <b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a> .
Noise and Vibration	The DCO proposal to increase the annual number of flights by more than 100,000 is going to directly impact the residents of the parish area, making the stream of flights continuous with the potential to continue at a higher level of intensity in the late evenings and early mornings. Sleep disturbance is already experienced by many residents, and this is set to get much worse as the spread of the flights is expanded into the 24-hour period. Currently there is no nighttime mitigation in place.	The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.
Noise and Vibration	Additionally arriving aircraft are turning into the ILS later and often with their undercarriage down, adding to the increased volume of noise heard at the ground as the planes are banking and applying braking mechanisms to slow down (both flaps and undercarriage).	The Noise Management Board completed a study on undercarriage noise at Lingfield in 2022-2023 and has made recommendations to airlines for improved procedures to reduce noise in this area.
Noise and Vibration	Although Lingfield is a medium sized village, it is not	Budget airlines, including EasyJet invest in newer aircraft that are quieter.

	<p>near any major road networks or industry and the ambient noise levels without the aircraft is low, especially during the night. Gatwick has already achieved a significant amount of passenger growth over the last 15 years, through increasing the number of flights and mechanisation of many processes from checking in to baggage sorting. This has resulted in a noticeable increase in the noise locally, both in the amount and frequency of noise. Although some airlines are investing in quieter aircraft, the budget lines which predominate at Gatwick do not invest in newer planes as frequently, if at all, and with the sheer number of aircraft, the noise levels are at a record high already. It should be noted that this growth has taken place through permitted development and without any mitigation provided for the local communities which are negatively impacted.</p>	<p>The transition of the airport's fleet to newer quieter types has been studied in detail in the ES, see also <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [<a href="#">APP-175</a>].</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7 The Noise Envelope</b> [<a href="#">APP-177</a>]. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [<a href="#">APP-175</a>] which explains some of the options considered and the choices made.</p>
<p>Traffic and Transport</p>	<p>The Parish Council also consider the approval of the DCO will lead to a significant increase in surface traffic which is going to have a severely detrimental impact on the wider community. It will affect our own residents</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]). Based on the modelling work, the Project is not expected to result in significant adverse effects which</p>

	<p>with delays to their travel to work and to the local secondary schools in East Grinstead, which already suffers congestion from the sheer weight of traffic because of the massive housebuilding programme being delivered by West Sussex.</p>	<p>require mitigation additional to the highway works already proposed.</p>
Traffic and Transport	<p>Any difficulties on the M23 cause the traffic to re-route to the A22 via East Grinstead and Lingfield becomes an unofficial East Grinstead “bypass” clogging the roads through the village.</p>	<p>The responsibility for determining diversion routes when the M23 is closed or disrupted lies with National Highways as the strategic highway authority. The assessment presented in the application takes account of typical conditions at peak times, in line with normal practice for undertaking assessments of this kind. The assessment presented in the application takes account of typical conditions at peak times, in line with normal practice for undertaking assessments of this kind.</p>
Traffic and Transport	<p>The anticipated increased number of passengers will be expected to get to and from the airport by car, as the train service is already at capacity. There is no scope to accept any more rail passengers because of the physical constraints on the line. There is no space for freight either.</p>	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment [AS-079]</b>. The assessment shows no significant increase in crowding on rail services is expected as a result of the Project. 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.</p>

		<p>Increase in freight movements have been considered as set out in Chapter 16 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and these movements are included in the strategic modelling work.</p>
<p>Agricultural Land Use and Recreation</p>	<p>The DCO proposal includes using open green land for car parking, which is unacceptable environmentally – especially as the loss of the carbon capturing vegetation is to facilitate the increase in CO2 emitting aircraft, which really is at odds with the Government’s intention to be net zero.</p>	<p>The impact of the Northern Runway Project on Agricultural land is assessed in Chapter 19 of the <b>ES-Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>]</p> <p>The areas of car parking proposed are identified on Figure 5.2.1b of the <b>ES Project Description Figures</b> [<a href="#">APP-053</a>]. There would be no provision of car parking with any associated loss of vegetation on agricultural land or areas of open space. The proposal to implement car parking on Pentagon Field which was assessed as part of the PEIR no longer forms part of the Project.</p>
<p>Traffic and Transport</p>	<p>Lingfield village also suffers from unofficial airport parking, where passengers park in our residential streets and take a taxi to the airport. There are also the “meet and greet” valet type parking companies, who bring the cars collected from their customers and park them in the open fields in the green belt around the village without the appropriate planning permissions, just moving to another field if they are</p>	<p>GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] sets out GAL’s commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions</p>

	subjected to a planning enforcement visit.	against unauthorised off-airport passenger car parking.
Traffic and Transport	A larger Gatwick will need proportionately greater supplies, which can only be transported in by truck. The premise of the DCO is also to propose to increase the freight carried by the long-haul flights into and out of the country. Again, this can only be transported by road, there being no capacity for freight on the already full London-Brighton rail line. All this extra HGV traffic will increasingly damage the road surfaces and add to the misery of congestion. This already creates tailbacks and delays on the local road network, which is running at capacity, especially at the junction of the A264 with the A22 in East Grinstead, as is the M23 and the M25.	Increases in freight movements have been considered as set out in Chapter 16 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ] and these movements are included in the strategic modelling work, which shows that the Project is not expected to result in significant adverse effects and no further mitigation is required.
Air Quality & Greenhouse Gases	The surface traffic for the increased passenger numbers, support staff, freight and supplies will add to the air pollution that is generated by the aircraft, providing an unhealthy mix of Nitrous Dioxide and Fine Particulates, as well as all the additional CO <sub>2</sub> , at a time when we are trying to reduce our country's carbon footprint.	An assessment of changes to air quality and greenhouse gases due to the Proposed Development is provided in <b>ES Chapter 13: Air Quality</b> [ <a href="#">APP-038</a> ] and <b>Chapter 16: Greenhouse Gases</b> [ <a href="#">APP-041</a> ] of the Environmental Statement (ES) respectively.  The air quality assessment has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with

		<p>the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed. The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16 Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Socio-Economics and Economics	Staffing will be an issue. The surrounding area does not have significant unemployment. Any workers on the lower pay scales won't be able to afford the local	Section 6 and 7 of <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> contains specific analysis of housing need. It also analysed, based on a breakdown of Project jobs by National



	<p>housing costs, and there is a significant shortage of "affordable" and social rented properties. Lingfield specifically, and Tandridge generally, has an acute shortage of affordable housing, with a council waiting list of nearly 2,000 families. These new workers will therefore need to be bussed in - which is already happening – because baggage handlers and hospitality/retail staff are often on Zero Hours contracts and can't afford to live locally. Even a pilot for Easy Jet is earning less than £23,000 a year - too little to get a mortgage on properties locally. The average price of houses in Lingfield is about £520,000 (from Zoopla 2023), well beyond the reach even of skilled pilots.</p>	<p>Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for.</p>
<p>Planning and Policy</p>	<p>The proposal to move the existing "northern" runway 12 metres to the north to allow safe departures all through the day, is not making best use of existing runways. It is the building of a completely new runway in a different location, with the consequence of having to relocate significant amounts of built form to other parts of their site, including the air traffic control tower and the</p>	<p>There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [APP-029]. The existing northern runway is grossly underused at present, i.e. it is used only when the main runway is closed, such as in an emergency.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> [APP-030]. The Project does not entail the construction of a</p>

	<p>fire station. It is going to build over vast swathes of open countryside for additional parking spaces, all of which adds harm to the local biodiversity and importantly adds additional run-off to the local drainage network.</p>	<p>new runway or complete re-building of the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5 Project Description</b> <a href="#">[APP-030]</a>:</p> <ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same width and length as the existing runway.</li> <li>• The repositioned northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m width of new runway.</li> </ul> <p>Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the relevance of the policy of making best use to the Project.</p>
<p>Water Environment</p>	<p>The area floods very frequently and along with the local water and power supply which is inadequate to support the existing airport capacity, there will be more power cuts and floods, including foul water and sewage.</p>	<p><b>Flood Risk</b></p> <p>GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The Environment Agency reviewed and accepted the updated baseline model that has informed the <b>NRP ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-147]</a> in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak</p>

		<p>water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 of <b>ES Chapter 11</b> [<a href="#">APP-036</a>].</p> <p>As part of the NRP an approximately 300m stretch of the River Mole downstream (north) of the runways will be renaturalised that will introduce a two-stage channel that will provide additional flood storage capacity and biodiversity benefits, similar to the stretch immediately downstream of this location to the north-west of the airport.</p> <p>ES Appendix 11.9.6: Flood Risk Assessment [<a href="#">APP-149</a>] demonstrates how GAL would respond to a flood event to ensure the safety of its passengers and staff.</p> <p><b>Wastewater</b> Modelling of the wastewater sewer system undertaken to inform the <b>ES Chapter 11: Water Environment</b></p>
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		<p><a href="#">[APP-036]</a> demonstrates that with mitigation measures included in the NRP see Table 11.8.1 of ES Chapter 11: Water Environment <a href="#">[APP-036]</a> the Gatwick wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. If capacity issues are identified, Thames Water would be responsible for reinforcing their network to support development and they would recoup their costs through infrastructure charges to GAL.</p>
Planning and Policy	Government policy was also to have the additional runway capacity at Heathrow and there is nothing I have seen anywhere in the application materials that provides any evidence that the so-called economic benefits will	<p><b>Section 9 of the Planning Statement</b> <a href="#">[APP-245]</a> contains the overall planning balance for the Project.</p>

	<p>outweigh the huge harms to the residents under the flight paths, the people using and living near the congested roads, the local and wider environment and CO2 emissions for Britain.</p>	
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### 3.55 London Borough of Richmond Upon Thames

3.55.1 Table 3.55.1 below sets out the Applicant’s response to the issues raised within the RR from London Borough of Richmond Upon Thames [[RR-2608](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.55.1 Applicant’s response to the matters raised by London Borough of Richmond Upon Thames**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
<p>Greenhouse Gases</p>	<p>Richmond Council opposes airport expansion in light of the climate emergency, and wishes to register as an Interested Party in case we wish to make further representations.</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>The potential scale of future emissions from the aviation sector, and the commitment to achieve emissions reductions in line with the UK carbon targets, is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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</i></p>

		<p><i>review will be in 2027, five years after publication of the Strategy in 2022. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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### 3.56 Mayfield and Five Ashes Parish Council

3.56.1 Table 3.56.1 below sets out the Applicant’s response to the issues raised within the RR from Mayfield and Five Ashes Parish Council [[RR-2919](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.56.1 Applicant’s response to the matters raised by Mayfield and Five Ashes Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Planning and Policy	1. The Policy has been misinterpreted by the applicant as this is an applicant for a new runway	There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [ <a href="#">APP-029</a> ]. The existing

	<p>which does not comply with policy, Government’s Aviation Strategy. Gatwick does not have 2 runways that it can operate concurrently today as such it is a new runway being constructed.</p>	<p>northern runway is used when the main runway is closed, such as in an emergency.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a>. The Project does not entail the construction of a new runway or complete re-building of the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a>:</p> <ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same width and length of the existing runway.</li> <li>• The repositioned northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m width of new runway.</li> </ul> <p>Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the relevance of the policy of making best use to the Project.</p>
<p>Noise and Vibration</p>	<p>2. Increase in aircraft noise – evidence an additional 101,000 flights a year to a cap of 386,000.</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment</p>

		<p>includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14 Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>
<p>Socio-Economics and Economics</p>	<p>3. Lack of affordable housing locally to enable workers to walk or cycle to work as the applicant proposes. And lack of amenities.</p>	<p>The Assessment of Population and Housing Effects (<b>Appendix 17.9.3 Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> Section 6 and 7) contains specific analysis of housing need. It also analysed, based on a breakdown of Project jobs by National Socio-Economic Classification, the potential need for affordable housing and compared this with existing assessments of affordable housing needs undertaken by local authorities, recent delivery affordable housing delivery rates, local plan policies for affordable housing and pipeline supply (based on large-scale strategic schemes and the proportion of affordable housing they expect to deliver). The analysis concludes that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond</p>



		<p>what is already emerging or being planned for.</p> <p>Section 5.2 of the Environmental Statement - <b>ES Chapter 5 Project Description</b> <a href="#">[AS-133]</a> summarises the active travel proposals for the Project. These proposals are illustrated in Figure 12.6.2 as part of the Environmental Statement - Traffic and Transport Figures <a href="#">[APP-037]</a>, and Surface Access Highways Plans - General Arrangements - For Approval <a href="#">[APP-020]</a>.</p>
Socio-Economics and Economics	4. Low skilled jobs are offered with little job security due to the volatile nature of the airport's leisure business.	The <b>Forecast Data Book</b> <a href="#">[APP-75]</a> at Table A1.1.1 shows that there will be jobs at a range of skill levels, not just low-skilled ones. Historically the airport's leisure business has not been particularly volatile, the Covid-19 pandemic and its impact on aviation was obviously a highly unusual event.
Traffic and Transport	5. Gatwick sits on a single main road, the M23 which is deemed an unsafe smart road. To add to the huge increase in freight, passengers and workers will cause a significant increase in congestion on residential roads and an inevitable decline in air quality. 6. The airport sits on the Brighton Main Line, which can't be expanded. Gatwick seeks to add an unacceptable burden to the line with over 32m extra passengers.	Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a> ). Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works already proposed. Safety on the strategic highway network, including the M23, is a matter for National Highways as the relevant highway authority. GAL has engaged extensively with National Highways during the preparation of the DCO

		<p>Application, as noted in Section 12.3 of <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a>, and will continue to do so.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows no significant increase in crowding on rail services is expected as a result of the Project. 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.</p>
Greenhouse Gases	7. Given the current climate emergency, a new runway would add a significant amount of carbon and greenhouse gases	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>The potential scale of future emissions from the aviation sector, and the commitment to achieve emissions reductions in line with the UK carbon targets, is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</p> <p><i>“We will monitor progress against our emissions reduction trajectory on an</i></p>

		<p><i>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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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### 3.57 National Air Traffic Services (NATS)

3.57.1 Table 3.57.1 below sets out the Applicant’s response to the issues raised within the RR from NATS [[RR-3221](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.57.1 Applicant’s response to the matters raised by NATS**

Topic	Matter raised in the RRs	The Applicant’s response
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General	NATS En-Route wishes to register as an Interested Party. It will submit a formal representation in due time.	Noted.
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### 3.58 New Economics Foundation

3.58.1 Table 3.58.1 below sets out the Applicant's response to the issues raised within the RR from the New Economics Foundation [[RR-3251](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.58.1 Applicant's response to the matters raised by the New Economics Foundation**

Topic	Matter raised in the RRs	The Applicant's response
Socio-Economics and Economics	NEF does not support the expansion of Gatwick Airport. The economic benefits are overstated by the applicant, and the economic and environmental downsides are understated.	The assessment of national impacts [APP-251] 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).
Socio-Economics and Economics	When the relevant scheme costs, benefits, their balance of equity, and the long-term societal risks are taken into account, the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and	The Applicant has undertaken a cost-benefit analysis which is set out in Section 8.10 of the <b>Needs Case</b> [ <a href="#">APP-250</a> ]. This includes consideration of the following effects: <ul style="list-style-type: none"> <li>• User Benefits (passenger, airlines and GAL itself)</li> <li>• Government Revenues</li> </ul>

	<p>international wellbeing. NEF intends to expand upon, and further evidence, the following arguments in its Written Representation. Many of the arguments set out here are supported by evidence set out in NEF’s recent report titled <i>Losing Altitude: The Economics of Air Transport in Great Britain</i>.</p>	<ul style="list-style-type: none"> <li>• Wider Economic Impacts</li> <li>• Environmental Costs (including carbon)</li> <li>• Scheme Costs</li> </ul> <p>The economic cost-benefit analysis shows that the scheme’s benefits significantly outweigh its costs (including environmental and carbon costs) with a Net Present Value (NPV) of around £21bn. In addition, there would be significant non-monetised effects, including employment and trade-related effects.</p>
Socio-Economics and Economics	<p>Our key areas of concern: The benefit-cost assessment submitted by the applicant is unusual and NEF has four key concerns. The final figures of this assessment are set out in Table 9.2.1 of the Need Case Appendix 1. First, NEF is concerned that the user (passenger) benefits claimed, worth £150bn, are significantly overstated. The figure quoted appears to be considerably larger than the benefit figures estimated by the Department for Transport and Airports Commission in 2017, which were produced for a much larger expansion of Gatwick Airport.</p>	<p>Overall market growth rates assumed by GAL aligned with wider DfT (Jet Zero ’22) forecasts derived from econometric forecasts for the wider UK aviation market. These forecasts are provided by the DfT where they also share sensitivities around scenarios for high and low growth trajectories.</p> <p>The top-down model (<b>ES Appendix 4.3.1: Forecast Data Book</b> [<a href="#">APP-075</a>]) provides support around the overall levels of demand, the share of the respective demand segments that Gatwick is likely to achieve. It also captures the constraints of other airports and the balance of demand across the London airports.</p>
Socio-Economics	<p>Second, Table 5.6.1 of the Need Case Appendix 1 reveals that the</p>	<p><b>ES Appendix 4.3.1: Forecast Data Book</b> [<a href="#">APP-075</a>] presents the air traffic and other forecasts that have informed</p>

<p>and Economics</p>	<p>overwhelming majority (90%) of the scheme’s claimed benefit originates from business passengers. It is highly questionable whether the claimed level of benefit is credible. Such a large bias within the scheme benefit towards better-off business travellers also raises equity issues. This must be stacked against the distribution of the scheme’s costs which will be felt disproportionately by less well-off communities at home and abroad.</p>	<p>the assessment of economic and environmental impacts of the Project. The way TAG estimates benefits is more focused on business travellers, but the actual benefits will be felt widely across all income groups. Table A1.1.1 of APP-075 shows that there will be jobs at a range of skill levels, including entry-level jobs and the Employment Skills and Business Strategy [APP-198] will help ensure benefits are targeted, including at those who are not currently working and/or living in deprived areas.</p>
<p>Socio- Economics and Economics</p>	<p>Third, the assessment fails to disaggregate benefits which arise to UK and non-UK residents. It is likely that a significant portion of the scheme’s claimed benefits arise to non-UK residents. The applicant’s excuse for failing to complete this exercise, at footnote 54 of Need Case Appendix 1 (p. 5-19), is not accepted. Disaggregation has been conducted in a variety of comparable instances. Government is clear in its 2022 Flightpath for the Future strategy document that airport expansion must deliver benefits “for the UK”. Furthermore, if benefits to overseas residents have been included, the environmental costs they</p>	<p>Paragraph 3.2.10 of TAG Unit A5.2 Aviation Appraisal states “Government guidance indicates costs and benefits should generally be considered for UK society only, this excludes non-UK residents.”</p> <p>However, it goes on to say “If it is possible to identify all impacts to non-UK residents, then impacts on these residents should be excluded from the central case. However, unless this apportionment can be done robustly for all impacts, in order to ensure internal consistency, the analysis should include all impacts on all affected parties, regardless of origin.”</p> <p>The <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> [APP-251] has been done in line with this guidance as it is</p>

	experience (particularly via inbound flights) should also have been included.	not possible to apportion costs robustly.
Socio-Economics and Economics	<p>Fourth, we are concerned that the benefit-cost assessment has excluded non-carbon greenhouse gas emissions. These are believed to deliver the majority of aviation’s negative impact on the climate, and would significantly increase the scheme’s costs.</p> <p>Government appraisal guidance provides a simple system for quantifying the value of non-carbon gases.</p>	<p>As set out at paragraph 7.3.12 of <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> [<a href="#">APP-251</a>], in line with DfT guidance the costs of non-CO2 emissions are not quantified because of the uncertainty around the magnitude of their impacts.</p> <p>The approach adopted on non-CO2 impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in <b>Section 16.4.12 onwards within the ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]. The approach adopted on non-CO2 impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in <b>Section 16.4.12 onwards within the ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]<a href="#">APP-041</a>]</p>
Forecasting and Need	<p>Overall, we are concerned that the benefit of the scheme to business travellers and hence business productivity is grossly overstated and grounded in over-optimistic forecasts of future business demand. Nationally, business air passenger numbers peaked in 2006. A structural change took place following the 2007/08 financial crisis which means total business passenger numbers have never fully recovered. There are strong indications that the</p>	<p>Business travel observed its peak in 2006 before experiencing a fall due to a significant economic shock triggered by the Global Financial Crisis. Although business travel experienced a downturn following this crisis, business passenger numbers within the London system have been steadily rebounding since. According to data from the CAA passenger survey, in 2019, business passengers within the London system accounted for 95% of the business passengers observed in 2006. There is no current indication to suggest that a similar rebound will not</p>

	<p>Covid-19 pandemic has triggered a second structural shift, which has further reduced business demand. The Applicant’s forecasts do not look credible. NEF’s view is that any new business passengers at Gatwick Airport that arise from this scheme will likely represent passengers displaced from other airports and not newly created. While passengers travelling for business purposes increased at Gatwick Airport between 2006 and 2019, numbers in the London Airport system did not. Business travellers shifted from Heathrow to airports such as Gatwick and Luton. Critically, DfT evidence highlights that when capacity is constrained, business travellers tend to displace leisure travellers and will continue to fly. New airport capacity is not required to serve current, or future, levels of business travel demand.</p>	<p>occur following the Covid-19 pandemic.</p> <p>It is crucial to acknowledge that during and after the pandemic, business travel to many destinations was not feasible, thus actual passenger numbers do not necessarily reflect the demand for business travel but rather the consequences of COVID-19 travel restrictions in place. As such, current patterns cannot accurately represent the value of future business trips and do not provide a reliable basis for assessing future growth in the volume and value of business air trips.</p>
<p>Socio-Economics and Economics</p>	<p>Gatwick Airport’s primary service is the sending of UK residents overseas on leisure trips. The absence of any quantification of the impact of outbound and overseas travel and tourism spending, and the net balance of tourism impacts, is skewing the</p>	<p>Tourism impacts are set out in Section 6.8 of <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> <a href="#">[APP-251]</a> which has been done in line with the DfT’s TAG guidance.</p> <p>As that notes at paragraph 6.8.6 there is no clear evidence that suggests that</p>



	<p>scheme’s presentation. Assessing the net tourism impact of a scheme was identified in a report commissioned by the DfT in 2018 as one of three “key diagnostic tests” of an air transport intervention’s merit. To exclude this function from detailed analysis flies against the fundamental principles of appraisal and skews the assessment of the scheme. Given the significant resource that has gone into the application it would have been possible to develop a far more sophisticated understanding of the implications of the Airport’s net tourism balance and its wider ramifications. Complexity is not an excuse for an impact to be ignored or dismissed.</p>	<p>a UK citizen who could have travelled and spent money abroad would spend similar amounts in the local economy if they remained in the UK. Even if they did spend the same amount, this would be a financial and not a welfare impact of the Project.</p> <p>There is strong Government policy support for the welfare benefits of outbound tourism, most notably in the Aviation Policy Framework at paragraphs 1.15-1.19 and on p.6- of Flightpath to the Future.</p>
Socio-Economics and Economics	<p>The equity dimensions of the scheme have not been presented by the applicant. The scheme will likely exacerbate inequity and run counter to the government’s levelling-up agenda.</p>	<p>Benefits will be felt widely across all income groups. Table A1.1.1 of <b>Forecast Data Book</b> <a href="#">[APP-075]</a> shows that there will be jobs at a range of skill levels, including entry-level jobs and the Employment Skills and Business Strategy <a href="#">[APP-198]</a> will help ensure benefits are targeted, including at those who are not currently working and/or living in deprived areas.</p>
Socio-Economics and Economics	<p>Expanding the existing airport capacity is likely to hurt the UK’s held-back regional economies that consistently</p>	<p>There is no evidence to support this position. As set out in Section 6.8 of <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> <a href="#">[APP-</a></p>

	<p>face a travel and tourism spending deficit while London sees a travel spending surplus. Further overseas tourism, incentivised via cheaper air travel, will take more cash away from high streets and the domestic tourism industry.</p>	<p><a href="#">251</a>], there is no clear evidence that suggests that a UK citizen who could have travelled and spent money abroad would spend similar amounts in the local economy if they remained in the UK. Even if they did spend the same amount, this would be a financial and not a welfare impact of the Project. They may also choose to spend it on imported goods rather than domestic tourism.</p> <p>Because of the welfare benefits of outbound tourism, there is strong Government policy support, most notable in paragraphs 1.15-1.19 of the Aviation Policy Framework and p.60 of Flightpath to the Future.</p>
<p>Socio-Economics and Economics</p>	<p>The applicant is right to assume that the employment effects of the proposed expansion will be limited. There has been no net national growth in air transport sector jobs since 2006. Evidence also suggests there has been minimal change in air transport employment in the Gatwick Airport Labour Market area, despite significant passenger growth at the airport.</p>	<p>The employment effects will be significant as set out in <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> and in Section 8 of the <b>Needs Case</b> <a href="#">[APP-250]</a>.</p>
<p>Socio-Economics and Economics</p>	<p>The quality of the jobs created is also questionable. Wages paid to lower and middle earners in air transport have been declining rapidly in real-terms in recent</p>	<p>As set out in Table A1.1.1 of the <b>Forecast Data Book</b> <a href="#">[APP-075]</a> there will be jobs at a range of skill levels.</p> <p>The data cited here (2008 – 2022) would be significantly affected by</p>

	<p>years. Indeed the Air transport sub-sector has seen the fastest decline in real wages of any sector in the UK economy between 2008 and 2022. Evidence should be put before the Examining Authority on trends in real wages at Gatwick Airport businesses over the past two decades in order to better understand its impact in the region.</p>	<p>Covid so is unlikely to represent the true underlying picture.</p>
<p>Greenhouse Gases</p>	<p>The Applicant should provide greater transparency on the environmental costs of the scheme. According with government guidance, traded-sector emissions should be valued and presented. These emissions will create an opportunity cost to other emitting sectors covered by the emissions trading scheme that will see higher emissions permit prices. The value of inbound flight emissions should be presented, non-carbon emissions should be valued. The risks of the scheme to the environment are significant, and approval would run counter to the precautionary principle. No solutions are presented by the Applicant, or in government policy, to the significant non-carbon emissions impacts caused by the scheme.</p>	<p>The traded and non-traded emissions are valued in Section 7.3 of <b>Needs Case Appendix 1 - National Economic Impact Assessment</b> [<a href="#">APP-251</a>] in line with DfT guidance. As set out above (and at paragraph 7.3.12 of APP-251) non-carbon emissions do not need to be valued.</p> <p>The approach adopted on non-CO2 impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is also discussed in Section 16.4.12 onwards within the <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041APP-041</a>].</p>

<p>Greenhouse Gases</p>	<p>The precise nature of the Jet Zero Strategy must also be considered. The government presents a ‘High Ambition’ scenario, which represents its preferred pathway to net zero emissions in the sector. However, this scenario represents only an “illustrative scenario” (Jet Zero, p.39) which will be used to monitor the sector’s progress (p. 60). The government cannot guarantee that this scenario will unfold as it depends on many factors outside of government’s direct control. Furthermore, many of the policies which will be required to increase the probability of the scenario being delivered are not yet designed or legislated. The risk that future emissions reduction technologies do not scale up at the pace desired should be considered.</p>	<p>The Government (and the Applicant) acknowledges that certainty cannot be applied to any specific measure and that the journey to net zero will be marked by changes in technologies, market mechanisms etc. It is for that reason, however, that the JZS explains that the Government has “<i>a clear goal, with multiple solutions</i>”. As the JZS acknowledges:</p> <p style="padding-left: 40px;"><i>“Although we recognise the high level of uncertainty associated with new technologies, we believe the principles and measures set out in this Strategy will provide the framework required to achieve ambitious in-sector emissions reductions.”</i> (para 1.8).</p> <p>Similarly, <i>JZS – one year on</i> emphasises the importance which the Government attaches to monitoring, particularly because the JZS contains a range of strategic principles and policy measures that adds complexity to evaluating the strategy and, therefore, that the Government must be alert to changes in each of these so that it can respond in order to meet its commitments (page 12).</p>
<p>Greenhouse Gases</p>	<p>Finally, it is important to understand that all additional greenhouse gas emissions make achievement of government net zero emissions targets harder, and all additional emissions entail opportunity costs to other</p>	<p>The increase in emissions from a range of GHG sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (future baseline, in the absence of the Project) scenario is not disputed. The impact of</p>

	<p>sectors and areas of society. The Jet Zero Strategy relies on unproven carbon capture technology to deal with residual sector emissions. Use of nascent carbon capture capacity to re-capture air transport emissions made from further, non-essential air travel, predominantly taken by wealthy frequent flyers, represents an inefficient use of capacity and should count against the scheme. Similarly, use of energy and land for the production of additional so-called Sustainable Aviation Fuels (SAFs) comes with a significant opportunity cost.</p>	<p>these changes has been assessed in line with relevant regulations and guidance as set out in <b>Section 16.4 the ES Chapter 16: Greenhouse Gases</b> [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. 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</i></p>
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		<p><i>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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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### 3.59 Newdigate Parish Council

3.59.1 Table 3.59.1 below sets out the Applicant’s response to the issues raised within the RR from Newdigate Parish Council [[RR-3253](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.59.1 Applicant’s response to the matters raised by Newdigate Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Traffic and Transport	This expansion which will nearly double the size of Gatwick will affect our local village enormously: Currently our rural roads are being used by increased numbers of speeding motorists and this will only get worse with no road infrastructure improvements to accommodate the increase of passengers/workers to Gatwick. At present, we are the overflow for the M23 and	Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]). The airport is well located to the strategic highway network and a large majority of the trips are expected to use the M23 Spur and the M23. Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works already proposed.

	<p>motorists who need to travel from East to West (and vice-versa) to access the airport. This has impacted residents enormously by making walking, cycling or horse-riding on our country roads dangerous as often we have no footpaths and blind bends which require careful and considerate driving. With no investment from Gatwick into the road infrastructure either with road or rail improvements this expansion is short sighted and irresponsible and will make the areas around Gatwick an inhospitable place to live.</p>	<p>As set out in commitment 14 of the <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a>, GAL will set aside a Transport Mitigation Fund (TMF) to give assurance that resource will be available for additional interventions in support of the commitments, or to provide mitigation of an unforeseen or unintended impact from the Project. The intention of this fund is to support further interventions in the area surrounding the Airport should they be necessary as a direct result of the Project. This may relate to physical infrastructure, changes to public transport services or facilities off-airport. Requests for and decisions on allocation from the TMF would be addressed through the Transport Forum Steering Group (TFSG) and sub-groups of it.</p>
<p>Traffic and Transport</p>	<p>At present, no local people can access the rail station without paying a surcharge to use it and the current bus network does not provide a service from many of the local villages ie. Charlwood, Newdigate, Capel, Rusper or Leigh with regular buses to the airport. However these are the places that would be most affected either by the increase usage of local roads or the noise and pollution from the airplanes overhead.</p>	<p>GAL currently offers car parking for users of the station and these parking products are outside the scope of the Project. No changes are proposed to station parking as part of the Project. Whilst there may not be direct or frequent buses from some of the local villages to Gatwick Airport station, alternative stations are available by bus, including Holmwood, Dorking and Crawley Stations.</p> <p>Strategic transport modelling has been undertaken as part of the Application, which includes the parish of Charlwood. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> <a href="#">[AS-</a></p>

		<p><a href="#">079</a>]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work, a small increase in traffic (around 5%) is expected through Charlwood although the assessment indicates that this would not give rise to significant environmental effects or require mitigation.</p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> sets out the bus and coach improvements identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to these services, or others which result in an equivalent level of public transport accessibility.</p> <p>Car parking charges are reviewed regularly to respond to changes in demand and to support achieving increases in sustainable transport use.</p>
<p>Traffic and Transport</p>	<p>This airport is owned by a French company who do not pay tax to the UK and are appearing to be only interested in increasing profit margins and rewarding their stakeholders. In addition, for many years Charlwood has seen open fields used for parking of customer cars which then offer a collect and drop of service. Some are illegitimate but many are not. Drivers are employed without the correct insurance to ferry</p>	<p>GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> sets out GAL’s commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions</p>



	<p>these cars at often high speed without thought to the local villagers and tail-gating residents who are keeping to the speed limit. As many as 500 movements in a day have been registered through Charlwood by reckless drivers. This has impacted families walking, children cycling and the elderly who visit the amenities in the village they live. Many of the villages mentioned have listed and historic buildings with residents who cherish and love the area they live in.</p>	<p>against unauthorised off-airport passenger car parking.</p>
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### 3.60 Norse Atlantic Airlines

3.60.1 Table 3.60.1 below sets out the Applicant’s response to the issues raised within the RR from Norse Atlantic Airlines [[RR-3354](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.60.1 Applicant’s response to the matters raised by Norse Atlantic Airlines**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Capacity and Operations	<p>Gatwick Airport, one of the busiest airports in the United Kingdom, has faced constraints due to its limited runway capacity, leading to congestion and delays for both airlines and passengers. Recognising the need for additional capacity, the proposal to expand the airport’s existing Northern Runway could significantly benefit customers and airlines, including Norse Atlantic Airways. The Current</p>	<p>Support is welcomed and noted. To address current constraints and enhance performance, London Gatwick has implemented an air traffic management and airfield infrastructure optimisation program. This includes initiatives such as Reduced Departure Separation, Time-Based Separation on arrival, and the construction of a new optimally sited Rapid Exit Taxiway (RET) to improve resilience. Collaboration with airlines and business partners is also ongoing to further enhance operational efficiency.</p>

	<p>Challenges at Gatwick Airport: Gatwick Airport has experienced significant growth in passenger numbers over the years, making it the second busiest airport in the UK. This surge in passenger traffic has resulted in increased congestion and delays, particularly during peak hours. The airport's existing single runway, operating at its maximum capacity, has led to a situation where Gatwick's ability to accommodate new airlines and routes is limited. This constraint has hindered the airport's potential for growth and the services that it can provide to the local catchment area and as a hub connecting short haul and long haul traffic.</p>	<p>GAL's plans to bring the existing northern runway into routine use are a crucial component of its plans to further improve our operational performance. If approved, the plans would decongest the existing single runway operation, significantly improving the airport's capacity and resilience.</p>
<p>Capacity and Operations</p>	<p>Benefits of Expanding Gatwick's Northern Runway</p> <p>Norse Atlantic Airways is a transatlantic airline that provides a low-cost, high-quality service primarily between Europe and North America. For Norse Atlantic Airways, the expansion of Gatwick's Northern Runway offers several compelling benefits:</p> <ol style="list-style-type: none"> <li>1. Enhanced Route Expansion: With increased runway capacity, Norse Atlantic Airways can expand</li> </ol>	<p>Support is welcomed and noted. London Gatwick agrees, the Northern Runway Project will allow the release of new slot capacity which will facilitate take up by existing and additional carriers and enable airlines to launch new destinations in new markets.</p>

	<p>its network and offer more routes to and from Gatwick. This means more choices for passengers and a greater level of competition that ultimately benefits the consumer.</p>	
Capacity and Operations	<p>2. Improved Punctuality: Gatwick's capacity constraints have often resulted in delays and disrupted schedules. The runway expansion can help Norse Atlantic Airways and other airlines improve on-time performance, enhancing the travel experience and customer satisfaction. With a dual-runway operation, congestion at the airport would decrease, leading to shorter taxi times, quicker turnarounds, and reduced holding patterns in the sky. This translates to fewer delays and smoother operations for all while lowering idle time engine emissions.</p>	<p>London Gatwick is proud to operate the world's most efficient single runway and the airport consistently achieves Service Quality Rates close to 100%. Despite the lack of capacity and the challenges that have impacted on-time performance (OTP), Gatwick has maintained an overall high level of service and reliability for its customers. The demand for slots at London Gatwick remains high, a testament to the airport's strategic importance and ongoing performance. The <b>Capacity and Operations Summary Paper</b> (Doc Ref 10.7) under the Dual Runway Operation section explains in more detail the concept of operation for the dual runway, how this will decongest the main runway.</p>
Capacity and Operations	<p>3. Enhanced Connectivity: Norse Atlantic Airways aims to connect Europe and North America efficiently. The expanded Gatwick Airport would be strategically positioned to facilitate this goal. The airport's extensive network of existing routes, coupled with the convenience of a second runway, would</p>	<p>The interest and support from Norse are welcomed.</p>

	<p>create a more robust and interconnected travel hub. Passengers would have more options when it comes to their travel destinations, and the competition among airlines would likely result in better pricing and services to the benefit of consumers.</p>	
Socio-Economics and Economics	<p>4. Economic Impact: The expansion of Gatwick Airport would have far-reaching economic benefits. It would create job opportunities during the construction phase and subsequently in the airport's operations. The increased capacity would bring a greater number of tourists to the wider South East area while also increasing the business traffic connecting on to the well-established high speed rail links from the airport to London.</p>	Noted.
Greenhouse Gases	<p>5. Environmental Considerations: The airport has openly committed to reaching net zero for direct carbon emissions before 2040 and this expansion project can facilitate this goal by incorporating sustainable practices and technologies. This commitment to sustainability aligns with Norse Atlantic Airways' aim to provide environmentally friendly travel options. With this shared focus, the airport</p>	The comment is noted and the support is welcomed.

	and the airline can work together to minimize their environmental impact.	
General – Support	The proposal to expand Gatwick Airport's Northern Runway will benefit Norse Atlantic Airways and all airlines operating at the airport. By addressing the longstanding capacity constraints, this project has the potential to transform Gatwick into a more competitive, efficient, and passenger-friendly hub. The long-term benefits of expanded capacity, reducing delays, and improving connectivity make this an opportunity that must be seized. Expanding Gatwick's Northern Runway is not just about the success of one airline; it is about the advancement of the entire aviation industry in the United Kingdom and providing a viable secondary hub that can actively compete with European alternatives to ensure that the UK remains at the forefront of the industry.	Noted. The Applicant welcomes Norse Atlantic Airways' support for the Project.

### 3.61 North Horsham Parish Council

3.61.1 Table 3.61.1 below sets out the Applicant's response to the issues raised within the RR from North Horsham Parish Council [[RR-3355](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.61.1 Applicant’s response to the matters raised by North Horsham Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General - Support	North Horsham Parish Council continues to support Gatwick Airports expansion of the Northern Runway.	Noted. The Applicant welcomes North Horsham Parish Council’s support for the Project.
Capacity and Operations	Additional clarification is required on the project to form a final decision particularly in relation to future aircraft flight paths. This is to address concerns regarding noise pollution and to minimise any adverse impact to residents of North Horsham.	<p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81). London Gatwick’s current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p> <p>The UK airspace modernisation programme not the Northern Runway Project, under a separate regulated (airspace change) process will consider the redesign of the London airspace. Airspace modernisation is compatible with the Northern Runway Project and will directly benefit London Gatwick in terms of safety, capacity, efficiency, resilience and in reducing environmental impacts.</p> <p>The assessment of noise effects is considered in <b>ES Chapter 14: Noise and Vibration [APP-039]</b> of the Environmental Statement submitted with the application.</p>

### 3.62 Nouvelair

3.62.1 Table 3.62.1 below sets out the Applicant’s response to the issues raised within the RR from Nouvelair [[RR-3358](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.62.1 Applicant’s response to the matters raised by Nouvelair**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General – Support	We would like to express our full support for this project.	Noted. The Applicant welcomes Nouvelair’s support for the Project.
Capacity and Operations	This project will provide additional capacity by increasing the number of air traffic movements. This will facilitate the process of obtaining the right slots for the airlines.	Support is welcome and noted. The <b>Capacity and Operations Summary Paper</b> (Doc Ref 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new and existing airlines to launch new destinations in new markets.
Socio-Economics	In doing so, the project will be responding to a growing need of additional flights, while at the same time opening up new investment opportunities.	Noted.
Traffic and Transport	We strongly approve this project as it makes best use of the existing infrastructure and improve traffic from/to LGW airport.	This supportive response is welcomed and noted.

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### 3.63 Ockley Parish Council

3.63.1 Table 3.63.1 below sets out the Applicant’s response to the issues raised within the RR from Ockley Parish Council [[RR-3360](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.63.1 Applicant’s response to the matters raised by Ockley Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration & Traffic and Transport	Ockley Parish Council wishes to raise concerns over the proposed massive expansion of Gatwick Airport on the ground of the impact on residents of the surrounding areas, including noise pollution, light pollution, road congestion and impact on local infrastructure. We will expand our response further in due course after this registration.	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]). The airport is well located to the strategic highway network and a large majority of the trips are expected to</p>



		use the M23 Spur and the M23. Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works already proposed.
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### 3.64 Outwood Parish Council

3.64.1 Table 3.64.1 below sets out the Applicant’s response to the issues raised within the RR from Outwood Parish Council [[RR-3381](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.64.1 Applicant’s response to the matters raised by Outwood Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Socio-Economics and Economics	There are a number of concerns regarding both economic benefits and disruption to the local community. It is not clear that the expansion can even be justified on economic grounds. The estimates given by the airport for the expected growth in passenger numbers are speculative, in addition to which the 'benefits' in economic growth and job creation for the local community are again overstated and speculative.	<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>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</p>

		<p>increase in local employment generated by an increase in air traffic.</p> <p>The estimate of total net effect (direct, indirect, induced and catalytic) i.e. taking account of additionality is set out in Table 6.1, <b>ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200]</b>. Para 6.3.5 is referring to estimating net DII only.</p>
<p>Noise and Vibration</p>	<p>The affect of noise in rural area is far greater because of the low base background, whereas in urban area the noise of an aircraft overflight may be the same or even below the typical 70dB background level. The World Health Organisation recommends no more than a one peak event of 45dB to avoid night time disturbance, but no work has been undertaking to access this impact in relation to rural communities with low ambient noise levels. The health impact of noise is well known (Hypertension etc) but these issues are typically ignored where large infrastructure projects are concerned. We would like to see a proper assessment made on noise pollution before any projects are approved.</p>	<p>The impact of noise and vibration from the Project have been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of <b>ES Chapter 14: Noise and Vibration [APP-039]</b>. The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by Noise Topic Working Group (comprising local authorities and the technical advisors) throughout preparation of the Environmental Statement.</p> <p>The Noise Management Board carried out a study into the effects of ambient noise on the impact of aircraft noise in 2018, which noted that peaks in aircraft noise are likely to be above background noise in urban areas, such as at the rear of residential properties that are acoustically screened from road traffic, as they area in rural areas.</p>

		<p>An assessment of the impact on health and communities has been undertaken and reported in <b>ES Chapter 18: Health and Community</b> [<a href="#">APP-043</a>] of the ES. This assessment uses the results of the Noise and Vibration assessment to identify health and community effects.</p>
Greenhouse Gases	<p>From an environmental stand point both emissions and noise are not being taking into account on a local level.</p>	<p>It is noted that various local authorities have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in <b>ES Paragraph 16.10.4: of ES Chapter 16 Greenhouse Gases</b> [<a href="#">APP-041</a>] that references the IEMA Guidance noting that <i>“The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.”</i></p>
Health and Wellbeing & Noise and Vibration	<p>The airport has failed to re assess the noise foot print caused by the airport, particularly in rural areas. The</p>	<p><b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] sets out the noise assessment for the Project. <b>ES Chapter 18: Health and Wellbeing</b></p>

	<p>affect of noise in rural area is far greater because of the low base background, whereas in urban area the noise of an aircraft overflight may be the same or even below the typical 70dB background level. The World Health Organisation recommends no more than a one peak event of 45dB to avoid night time disturbance, but no work has been undertaken to assess this impact in relation to rural communities with low ambient noise levels. The health impact of noise is well known (Hypertension etc) but these issues are typically ignored where large infrastructure projects are concerned. We would like to see a proper assessment made on noise pollution before any projects are approved.</p>	<p><a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes to Noise Exposure’ considers the population health implication of the changes due to the Project. The health assessment references and has regard to the WHO noise guidelines, as well as other scientific research on the health effects of noise. The health assessment has regard to vulnerable groups across the health study areas. Outwood forms part of the ‘health local study area’ that considers effects to the populations of Crawley, Reigate and Banstead, Tandridge, Mid Sussex, Horsham and Mole Valley. This includes effects in rural as well as urban areas. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders.</p> <p>Please see our response two rows above on the assessment of noise in rural communities.</p>
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### 3.65 Penshurst Parish Council

3.65.1 Table 3.65.1 below sets out the Applicant’s response to the issues raised within the RR from Penshurst Parish Council [\[RR-3536\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.65.1 Applicant’s response to the matters raised by Penshurst Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration & Greenhouse Gases	Noise Expansion of Gatwick would significantly increase aircraft noise in the area. The noise envelope proposals Gatwick has proposed are not consistent with government policy and CAA	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future

	<p>guidance and are wholly one-sided. They should be substantially revised. Night flights A ban on night flights should be a condition of any expansion at Gatwick. The airport should also be required to set out a comprehensive package of measures to incentivise the use of the quietest aircraft at night outside the hours of a ban. Most specifically growth should be conditional on independently monitored and simultaneous reductions in both emissions associated with Gatwick flights (including the non-CO2 climate change effects of such flights) and noise.</p>	<p>baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>The Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as</p>
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		<p>described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p> <p>Gatwick Airport already has a well-developed and comprehensive noise management system summarised in Section 3 of <b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a> which is monitored and enforced through a number of processes including the 2022 Section 106 Agreement with the local authorities, the Noise Action Plan through Defra and the Environmental Noise (England) Regulations 2006, and Operating Procedures and Operating Restrictions (including the Night Restrictions) enforced the Department for Transport. It is not the purpose of the Noise Envelope to replicate these or prescribe particular actions to reduce noise, but rather to set the overall noise limits that must be achieved to ensure noise is limited and reduces, and the processes to ensure these are legally enforceable. This is what the proposed Noise Envelope provides. It provides limits on overall noise levels during the day and the night, enforceable through the Development Consent Order and processes outlined therein (see sections 15 and 16 of the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a>).</p>
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		<p>The approach adopted on non-CO2 impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in Section 16.4.12 onwards within the <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>].</p>
Traffic and Transport	<p>Expansion would increase road congestion around Gatwick very substantially, with serious adverse consequences for local communities and businesses.</p>	<p>Strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]). The airport is well located to the strategic highway network and a large majority of the trips are expected to use the M23 Spur and the M23. Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works already proposed.</p>
Socio-Economics & Economics	<p>The economic benefits of expanding Gatwick have been overstated by the applicant, and the economic and environmental costs have been ignored and/or understated. The economic benefits of air transport growth are subject to diminishing returns. In an already highly connected economy such as the UK, additional economic benefits from further expanding air transport are largely dependent on net inbound tourism and business travel growth, both of which are</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>absent in the UK today. When the relevant scheme costs, benefits, and the long-term societal risks are taken into account, the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and international wellbeing. In addition, the proposed scheme will incentivise UK residents to spend larger amounts of cash overseas, costing jobs and economic activity at home. This would penalise non-south east regions of the UK, which operate a very significant travel spending deficit, contradicting the government's levelling-up agenda.</p>	
Noise and Vibration	<p>Concern over a potential 70% increase in runway use; increased overhead concentration of flights; increase in noise pollution; increase in night flights; lack of regulation or government oversight.</p>	<p>Please see the response above on the impacts of aircraft noise.</p>

### 3.66 Rotherfield Parish Council

3.66.1 Table 3.66.1 below sets out the Applicant's response to the issues raised within the RR from Rotherfield Parish Council [[RR-3949](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.66.1 Applicant's response to the matters raised by Rotherfield Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
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<p>Greenhouse Gases</p>	<p>The Rotherfield Parish Council consider that the further enlargement of airport capacity is inconsistent with the objectives of COP26 et al and therefore support the objections raised by East Sussex County Council</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>The potential scale of future emissions from the aviation sector, and the commitment to achieve emissions reductions in line with the UK carbon targets, is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. 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. 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</i></p>
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		<p><i>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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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### 3.67 Royal Mail

3.67.1 Table 3.67.1 below sets out the Applicant’s response to the issues raised within the RR from Royal Mail [[RR-3956](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.67.1 Applicant’s response to the matters raised by Royal Mail**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Construction	Royal Mail (RM) does not have an in principle objection to the Gatwick Airport Northern Runway DCO proposals but is seeking to secure mitigations to protect its operations during the construction and operational phases. RM does not wish to stop or delay this scheme from being constructed, but does wish to protect its future ability to provide an efficient mail sorting and delivering service. In order to do this, RM requests that:	A response to each matter raised by Royal Mail is provided below.
Construction	1. the DCO includes specific requirements that during the construction phase RM is	<b>ES Appendix 5.3.2: Code of Construction Practice</b> [ <a href="#">APP-082</a> ], Section 4.12 sets out the proposed

	<p>notified by Gatwick Airport Limited or its contractors at least one month in advance of any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final CTMP,</p>	<p>activities to engage with the local community and stakeholders during the Project's construction activities. As part of this, GAL will develop a Communications and Engagement Management Plan to ensure that stakeholders are informed of work activities and to maintain good relationships with other parties. As explained in paragraph 6.1.5 of the CoCP, a Community Liaison Officer will be put in place and will be responsible for liaising with residents and local businesses and implementing the Communications and Engagement Management Plan.</p> <p>Hours of working are also set out in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, namely in Section 4.2.</p>
Construction	<p>2. the final CTMP includes a mechanism to inform major road users (including RM) about works affecting the local highways network (with particular regard to RM's distribution facilities near the DCO application boundary), and</p>	<p>Please refer to our response above regarding measures within <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> to engage with the local community and stakeholders during the Project's construction.</p>
Construction	<p>3. RM is invited to join the Gatwick Airport Transport Forum Steering Group.</p> <p>RM reserves its position to object to the DCO application if the above requests are not adequately addressed.</p>	<p>The Applicant would like to understand from Royal Mail the reasons for which they believe involvement in the Transport Forum Steering Group is necessary as the group is not related to construction.</p>

### 3.68 Rusper Parish Council

3.68.1 Table 3.68.1 below sets out the Applicant's response to the issues raised within the RR from Rusper Parish Council [[RR-3960](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.68.1 Applicant's response to the matters raised by Rusper Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
Noise and Vibration, Air Quality, Traffic and Transport & Greenhouse Gases	Increase in aircraft noise and air pollution Lack of Infrastructure/increase in local traffic Climate Emergency Costs	Noted. The assessments undertaken for each topic can be found in the following application documents: <ul style="list-style-type: none"> <li>• <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>]</li> <li>• <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>]</li> <li>• <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]</li> <li>• <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]</li> </ul>

### 3.69 Salfords and Sidlow Parish Council

3.69.1 Table 3.69.1 below sets out the Applicant's response to the issues raised within the RR from Salfords and Sidlow Parish Council [[RR-3989](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.69.1 Applicant's response to the matters raised by Salfords and Sidlow Parish Councils**

Topic	Matter raised in the RRs	The Applicant's response
General – Opposition	Salfords & Sidlow Parish Council OBJECT to Gatwick Airport's application to enable dual runway operations at Gatwick Airport through altering the existing northern runway, lifting restrictions on the northern runway's use and delivering the upgrades or additional facilities and infrastructure required to increase the passenger	Noted. The Applicant's response to Salford and Sidlow Parish Council's detailed points is set out below.

	throughput capacity of the airport.	
Noise and Vibration	<p>Salfords &amp; Sidlow Parish Council would be predominantly affected by the increased harm to our residents from the greater number of passenger and flight numbers leading to both larger aircraft, which the dual runway operations would make possible, and concentration of noise on our Parish. This increased harm would be from both noise and air pollution. Gatwick aircraft affect residents of the civil parish of Salfords &amp; Sidlow when using Route 4. Due to the prevailing winds about 2/3 of take offs are to the west with about half of these being on Route 4. For many years aircraft on the Route 4 SID flew well north of the NPR centre line and the 2013 Airspace Change Proposal made it clear that PRNAV routes would replicate the SIDs, the legacy route. This is not what was done. While we recognise this application does not deal with changes to the Routes we are understandably concerned that Route 4 will continue to fly south of the legacy route. Most of the centreline of the straight part of Route 4 NPR, after the turn, is over our</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Section 4 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> explains the Project does not require the routings of aircraft to or from the airport to be changed, but rather increases the numbers of flights on existing routes.</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in</p>

	<p>parish and that route has brought aircraft over more of the residents of Sidlow is directly over the centre of the village of Salfords. Gatwick Airport should not benefit at the expense of increased harm to people on the ground. Any increase in flying to and from Gatwick Airport should keep to the principal that there should be no increase in the number of people affected, there should be no newly overflowed people. Likewise, there should be no increase in the noise inflicted on people on the ground. With this as our principle, the Parish Council questions how there can be no new people overflowed when many of the aircraft over our Parish are able to be vectored at 4000 ft plus so this is not in control of Gatwick or this DCO application.</p>	<p><b>ES Appendix 14.9.5: Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p> <p>A decision by the CAA related to specific historic issues with the track of the Route 4 Standard Instrument Departure (SID) routes was quashed following a Judicial Review. This is being addressed through an airspace change sponsored by the airport under the regulated process set out by the Civil Aviation Authority. During the process of responding to litigation on the Route 4 airspace change the CAA discovered that the historical changes (circa 1999) to the conventional route were not for entirely the reasons originally identified.</p> <p>The formal notification issued to GAL by the CAA is available to read online. The letter states that ‘it became apparent that magnetic drift was not the predominant factor causing displacement of the Route 4 SIDs from the Noise Preferential Route (NPR). The CAA considered that it could not allow its decision to stand where such a decision was based upon a misunderstanding of the relevant facts.’</p> <p>This information was not previously available to either the CAA or London Gatwick. Because the CAA considered that GAL could not have conducted a proper consultation in 2016, it could not allow its decision to stand.</p>
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		This issue falls outside of the scope of the DCO.
Need and Forecasting	The proposed additional passenger numbers have been double-counted from other airport applications in the South-East. Collectively they would require a significant north-south further shift on already heavily burdened Motorways and trunk roads, with overwhelming increase in traffic in the sky between Heathrow and Gatwick.	<p>The forecasts presented in <b>the ES Appendix 4.3.1: Forecast Data Book [APP-075]</b> are unique to Gatwick. Indeed, they are derived from a close understanding of the demand from Gatwick’s airlines and the markets they serve. The point made about double counting is not understood.</p> <p>The forecasts reflect forecast growth in the market. They do not rely on the South East achieving an increased share of the aviation market.</p> <p>The impacts of the forecast growth are fully accounted for in the application.</p>

### 3.70 SAS Scandinavian Airline Services

3.70.1 Table 3.70.1 below sets out the Applicant’s response to the issues raised within the RR from SAS Scandinavian Airline Services [\[RR-4090\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.70.1 Applicant’s response to the matters raised by SAS Scandinavian Airline Services**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General – Support	SAS Scandinavian Airlines supports the development and considers the main impact to be the addition of capacity that would enable new airlines to enter the currently congested airport. This would be beneficial for the accessibility for the whole of Southeast England.	Noted. The Applicant welcomes SAS Scandinavian Airline Service’s support for the Project.

### 3.71 Sevenoaks District Council

3.71.1 Table 3.71.1 below sets out the Applicant’s response to the issues raised within the RR from Sevenoaks District Council [[RR-4108](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.71.1 Applicant’s response to the matters raised by Sevenoaks District Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration	<p>It is appreciated that Gatwick Airport has economic benefits to the District and nationally however, Sevenoaks District Council has had longstanding concerns regarding the noise from flights. The rural southern part of the district is within Gatwick’s flight paths. The residents of the southern part of the district are already greatly impacted by the noise disturbance from the aircrafts when arriving and departing from Gatwick. SDC’s primary concern for Gatwick’s expansion aspirations is that additional flights will further exacerbate the already unacceptable noise disturbance residents’ face.</p>	<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>]. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5: Air Noise</b></p>



		<b>Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.
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### 3.72 Shere Parish Council

3.72.1 Table 3.72.1 below sets out the Applicant’s response to the issues raised within the RR from Shere Parish Council [\[RR-4151\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.72.1 Applicant’s response to the matters raised by Shere Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration	This is a provisional response from Shere Parish Council and is subject to ratification or amendment by the full council. The parish of Shere, particularly the hills in the southern section of the parish, are frequently overflowed by aircraft from Gatwick often at quite low altitude. This is usually when westbound aircraft are taking off in an easterly direction due to weather conditions. This can cause disturbance to our residents and we would oppose the increase in traffic that would result from the building of a second runway.	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> . Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.
Greenhouse Gases	When there is no serious expectation of air traffic being “de-carbonised” in the near future, it is fundamentally inappropriate to increase air	The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase

	<p>traffic with its resultant worsening of global warming.</p>	<p>compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>The potential scale of future emissions from the aviation sector, and the commitment to achieve emissions reductions in line with the UK carbon targets, is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. 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. 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</p>
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		expansion (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government's commitment to the UK's net zero trajectory.
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### 3.73 South Downs National Park Authority

3.73.1 Table 3.73.1 below sets out the Applicant's response to the issues raised within the RR from the South Downs National Park Authority [RR-4234], including signposting to the relevant sections of the DCO Application.

**Table 3.73.1 Applicant's response to the matters raised by the South Downs National Park Authority**

Topic	Matter raised in the RRs	The Applicant's response
Landscape, Townscape and Visual	The application site is outside of the South Downs National Park, however the proposals will have some impact on the National Park, in particular in respect of tranquillity and dark night skies.	<p>Section 8.9 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] describes the impacts on landscape and townscape character and visual amenity during the daytime and at night as a result of an increase in built form and concentration of lighting at the airport within an urban and rural setting and the influence on the perception of tranquillity due to overflying aircraft (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in <b>Figures 8.6.3: to 8.6.7</b> of the <b>ES Landscape, Townscape and Visual Resources Figures</b> [APP-062] together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor</p>

		<p>adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the South Downs National Park experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived.</p>
Consultation	<p>Despite our offer to work with Gatwick Airport Limited (GAL) both at scoping and during the statutory consultation in 2021, we have not been approached by the applicant.</p>	<p>The Applicant has taken into account South Downs National Park Authority’s response to the PEIR into account in its Environmental Statement, which expects only minor adverse and not significant effects. The Applicant would be very willing to meet with South Downs National Park Authority to explain these assessments.</p>
Landscape, Townscape and Visual	<p>1. The impact on relative tranquillity within the National Park as a result of an increase in overflights, to the National Park as a whole and also over key sites including Petworth Park and Ditchling Beacon. The Landscape and Visual Impact Chapter of the Environmental Statement advises that there would be a minor adverse effect on the perception of tranquillity, based on there being an increase of 2 flights per day over either the central and/or eastern part of the National Park. There is no mechanism</p>	<p>Section 8.9 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] describes the impacts on landscape and townscape character and visual amenity during the daytime and at night as a result of an increase in built form and concentration of lighting at the airport within an urban and rural setting and the influence on the perception of tranquillity due to overflying aircraft (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in <b>Figures 8.6.3 to 8.6.7</b> of the <b>ES Landscape, Townscape and Visual Resources</b></p>

	<p>to control or limit the number of flights per day and this figure seems very low in relation to the overall increase in flights that would be enabled by the proposed development.</p>	<p><b>Figures</b> <a href="#">[APP-062]</a> together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the South Downs National Park experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be apparent.</p>
Landscape, Townscape and Visual	<p>2. Effect on Dark Night Skies. The South Downs National Park is designated as an International Dark Night Skies Reserve. More overflights above the National Park will make it more difficult to view an authentic night sky. Regarding contrails it is also a potential concern – albeit a matter of debate – whether contrails seed small clouds that then make the sky more opaque.</p>	See above.
Landscape, Townscape and Visual	<p>3. It does not appear that the proposal has had regard to the National Park’s Statutory Purposes or the Special</p>	See above.

	<p>Qualities for which the National Park has been designated. The National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995, sets the following statutory purposes for National Parks: 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2. To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.</p>	
Landscape, Townscape and Visual	<p>4. In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies (such as the Planning Inspectorate) to have regard to these purposes. This ensures that relevant authorities take account of these purposes when coming to decisions or carrying out their activities relating to or affecting land within National Parks.</p>	See above.
Greenhouse Gases & Air Quality	<p>5. In respect of air pollution and climate change we recognise these will be issues to be addressed and considered by the Examining Authority and Secretary of State.</p>	<p>An assessment of changes to air quality and greenhouse gases due to the Proposed Development is provided in <b>ES Chapter 13: Air Quality</b> and <b>Chapter 16: Greenhouse Gases [APP-041]</b> respectively.</p>

		<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed. The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions</p>
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		arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.
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### 3.74 Southern Gas Networks

3.74.1 Table 3.74.1 below sets out the Applicant's response to the issues raised within the RR from Southern Gas Networks [[RR-4238](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.74.1 Applicant's response to the matters raised by Southern Gas Networks**

Topic	Matter raised in the RRs	The Applicant's response
Compulsory Acquisition and Compensation	SGN is the licensed gas transporter for the Order area, and objects so as to ensure the protection of its interests in land and apparatus and the safe and effective operation of its gas transportation network. As a responsible statutory undertaker, SGN's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. The Promoter seeks powers within the Order for the compulsory acquisition of land and rights in which SGN is interested. SGN therefore wishes to protect its position in light of existing apparatus which is both within, and in the vicinity of, the proposed Order boundaries through suitable protective provisions being secured in the Order.	<p>The Applicant has consulted regularly Southern Gas Networks (SGN) both pre and post submission.</p> <p>The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of SGN's undertaking because the Applicant has included draft protective provisions for the benefit of SGN in Part 5 of Schedule 9 of the <b>draft DCO</b> [<a href="#">AS-127</a>].</p> <p>The Protective Provisions in the draft DCO ensure that SGN's apparatus will be protected, and access maintained during construction. The Applicant is not intending to extinguish any rights belonging to SGN.</p> <p>The Applicant acknowledges SGN's objection to the compulsory acquisition powers in respect of the plots which it has an interest in. The Applicant is engaged with SGN to agree appropriate terms so it can acquire the new rights for the gas mains and apparatus by voluntary agreement.</p>



	<p>SGN’s rights to retain its infrastructure in situ and rights of access to inspect, repair and renew such apparatus within the limits of the respective Order must be maintained at all times, and access by SGN and its servants and agents to that apparatus for the purpose of its undertaking must not be restricted. Accordingly, SGN will require appropriate protective provisions to be included within the Order to protect its statutory undertaking and to ensure that public safety is not compromised. Equally both the Examining Authority and the Secretary of State will need to be satisfied that the project will not cause a serious detriment to the carrying out by SGN of its statutory undertaking before granting consent to the proposed Order.</p>	<p>However, the Applicant will continue to seek compulsory acquisition powers over SGN’s land so that Gatwick Airport Northern Runway Project can be delivered in the event that it is not possible to acquire the rights by voluntary agreement.</p>
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### 3.75 Speldhurst Parish Council

3.75.1 Table 3.75.1 below sets out the Applicant’s response to the issues raised within the RR from Speldhurst Parish Council [[RR-4239](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.75.1 Applicant’s response to the matters raised by Speldhurst Parish Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Noise and Vibration	Noise Expansion of Gatwick would significantly increase aircraft noise for those further away under flight paths which	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have

	<p>will include our parish. The noise envelopes Gatwick has proposed are not consistent with government policy and CAA guidance and are wholly one-sided. They should be substantially revised. Night flights ?We have called for this many times before, but a ban on night flights should be a condition of any expansion at Gatwick. The airport should also be required to set out a comprehensive package of measures to incentivise the use of the quietest aircraft at all times but particularly at night outside the hours of a ban. Finally, it remains relevant and appropriate to consider that while the collaboration between the Department for Transport and the Civil Aviation Authority is aimed at improving and modernising air traffic, the current noise impact on the communities living under the current flightpaths remain unacceptable as a result of no adequate monitoring and enforcement arrangements. The current situation will therefore be greatly exacerbated by the proposed expansion and should not be permitted without such monitoring and enforcement arrangements.</p>	<p>been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Speldhurst currently has, and will have with the Project in all assessment years, noise levels below the day and night Lowest Observable Adverse Effects Levels (LOAELs), below N65 20 in the daytime and below N60 10 at night as can be seen on the online Air Noise Viewer the link to which is provided in ES Chapter 14 paragraph 14.9.80. Although noise modelling results are not available for this area because levels are below the values stated above, noise levels are likely to increase in the noisiest year by Leq 16 hr less than 1dB (See ES Figure 14.9.5) and Leq 8 hr night-time by less than 1dB (see ES Figure 14..10) as a result of the Project. This will not give rise to a significant noise effect.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to</p>
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		<p>limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere. A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> <a href="#">[APP-175]</a> which explains some of the options considered and the choices made.</p>
<p>Planning and Policy</p>	<p>Following a detailed and comprehensive review about the location of one additional runway in the South of England, finalised in 2015 the Government decided to approve a third runway at Heathrow. Gatwick's submission for an additional runway was rejected. Nothing has changed except that the expected growth in air traffic</p>	<p>The application of planning policy for the Project is set out in the <b>Planning Statement</b> <a href="#">[APP-245]</a>. Most notably, Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> explains makes clear that whilst the Airport National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it does not in any way exclude Gatwick Airport from the policy encouragement to intensity its use and capacity. Paragraph 1.39 of</p>

	<p>has been deferred by the impacts of the Covid pandemic. As a result the request by Gatwick to build an additional runway (and that is what this is) should be rejected as inconsistent with that Government mandate. Notwithstanding the above there are various direct factors which must be addressed in the event of any development at Gatwick. Need Gatwick’s overall case for expansion does not comply with the Airports National Policy Statement which requires airports (other than Heathrow) to demonstrate sufficient need to justify their expansion proposals, additional to (or different from) the need which would be met by the provision of a Northwest Runway at Heathrow.</p>	<p>the ANPS states that the Government is supportive of airports beyond Heathrow making best use of their existing runways.</p> <p>As such, no conflict arises between the ANPS and the NRP.</p>
<p>Landscape, Townscape and Visual</p>	<p>It remains relevant and appropriate to consider the serious implications for the local tourism economy affected by the proposed expansion. Gatwick Airport is situated within an area valued for its unparalleled historical importance and natural beauty. At present, no coherent assessment has been commissioned/published focusing on the</p>	<p>Section 8.9 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] includes a thorough assessment of effects on the perception of tranquillity within nationally designated landscapes as a result of an increase in the number of visible and/or audible overflying aircraft up to 7,000 ft above local ground level. The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56).</p>

	<p>consequences of an inevitable urbanisation within an area of outstanding natural beauty retaining, inter alia, the highest percentage of ancient woodland and some of the darkest night skies across the British Isles.</p>	<p>Frequency of aircraft movements and general orientation of flights are illustrated in <b>Figures 8.6.3 to 8.6.7</b> of the <b>ES Landscape, Townscape and Visual Resources</b> <a href="#">[APP-062]</a> together with nationally designated landscapes and 10 popular and well-known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived.</p>
<p>Greenhouse Gases</p>	<p>Climate change and air pollution Expansion on the scale proposed would increase very substantially the CO2 emissions and other climate effects associated with Gatwick’s operations and flights. There are currently no proven technologies for reducing aviation emissions at scale. Expansion of Gatwick would therefore have a material impact on the UK’s ability to meet its carbon reduction targets. Carbon emissions will also result from construction works and</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</p>

	<p>increased road traffic to the airport. Flights and traffic will make air pollution worse. As of October 2023, it remains relevant and appropriate to consider that Gatwick’s expansion approach is in direct opposition with the government’s climate objectives. The statement issued by the Climate Change Committee (CCC) in June 2023 highlights the urgency of developing a ‘capacity management framework’ for the aviation sector prior to any expansion application being considered by the UK government.</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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p> <p>With regards to the transportation of alternative fuels in a future scenario - it cannot be determined if this will indeed be the mechanism whereby supplies of energy for aircraft are brought for refuelling/recharging (an in some scenarios - e.g. electric aircraft -</p>
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		<p>deliveries will be through electricity networks). The existing fuel regime requires transportation of liquid aviation fuel by road, and any increase in this arising from changes in aviation profiles is not expected to be so different in scale from existing patterns as to represent a significant impact.</p>
<p>Traffic and Transport</p>	<p>Transport impacts Gatwick’s targets to increase how many people bus, train, walk and cycle are insufficient to prevent a massive increase in road traffic around the airport. This increase in traffic would increase congestion on local roads and increase off-airport parking. Gatwick is not providing any extra rail services but the project will increase pressure on future train services, with the result that more passengers will have to stand on the mainline services between London Victoria and Brighton. Further inconvenience for people not using the airport but as a direct result of Gatwick’s activities.</p>	<p>Extensive assessments have been undertaken in the form of strategic and microsimulation modelling work as part of the application (see Chapters 12 and 13 of the <b>Transport Assessment [AS-079]</b>). The airport is well located to the strategic highway network and a large majority of the trips are expected to use the M23 Spur and the M23. Based on the modelling work, the Project is not expected to result in significant adverse effects which requires mitigation additional to the highway works already proposed.</p> <p>No off-airport car parking is proposed. GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b> sets out GAL’s commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions against unauthorised off-airport</p>

		<p>passenger car parking.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment</b> <a href="#">[AS-079]</a>. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project. Where standing is expected, spare standing capacity would remain available. The rail crowding assessment indicates that no additional mitigation is required. 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.</p>
<p>Socio-Economics and Economics</p>	<p>This growth at Gatwick will have a huge adverse environmental effect on our communities and countryside. The primary people to benefit will be Gatwick's shareholders. 7) Economic case The economic benefits of expanding Gatwick have been overstated by the Gatwick Airport Ltd. Significant economic, social and environmental costs have been ignored and/or understated. The economic</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-</p>



	<p>benefits of air transport growth are subject to diminishing returns. In an already highly connected economy such as the UK, additional economic benefits from further expanding air transport are largely dependent on net inbound tourism and business travel growth, both of these are absent in the UK today. When Gatwick's scheme costs, benefits, and the long-term societal risks are taken into account, the scheme's economic case no longer stacks up and entails unreasonable levels of risk to local wellbeing.</p>	<p>count benefits (e.g. trade benefits are quantified but not included in the NPV).</p>
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### 3.76 SunExpress Airlines

3.76.1 Table 3.76.1 below sets out the Applicant's response to the issues raised within the RR from SunExpress Airlines [\[RR-4391\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.76.1 Applicant's response to the matters raised by SunExpress Airlines**

Topic	Matter raised in the RRs	The Applicant's response
General	LGW is the key London Airport for touristic offerings.	Noted.
Capacity and Operations	The growth of SunExpress Airlines is currently limited due to the lack of slot and constrained capacity at LGW. SunExpress Airlines would support additional slots/capacity at LGW to become available to support the growth of SunExpress Airlines	Support is welcome and noted. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global

		<p>connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new and existing airlines to launch new destinations in new markets.</p>
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### 3.77 Surrey Hills AONB Board

3.77.1 Table 3.77.1 below sets out the Applicant’s response to the issues raised within the RR from Surrey Hills AONB Board [[RR-4400](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.77.1 Applicant’s response to the matters raised by Surrey Hills AONB Board**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
<p>Landscape, Townscape and Visual</p>	<p>The Surrey Hills Area of Outstanding Natural Beauty is a nationally protected landscape. One of the main qualities and public benefits of the Surrey Hills is its relative tranquillity within easy reach for many Londoners, those living in Surrey and visitors. It provides a haven for these people to get away from the stresses and strains of modern, mostly urban, living. It is exceedingly popular and one of the most frequented of any AONB and National Parks in the country. The importance of the tranquillity of the countryside and particularly nationally protected landscapes to people's mental health has increasingly become recognised in recent years. When balancing the relevant</p>	<p>Section 8.9 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] includes a thorough assessment of effects on the perception of tranquillity within nationally designated landscapes as a result of an increase in the number of visible and/or audible overflying aircraft up to 7,000 ft above local ground level. The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in <b>Figures 8.6.3 to 8.6.7</b> of the ES [<a href="#">APP-062</a>] together with nationally designated landscapes and 10 popular and well-known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline</p>

	<p>considerations to using the existing emergency runway at Gatwick for regular use the Government requires great weight to any harm to an AONB, in this case being a real threat to the public's enjoyment of the Surrey Hills and their mental health. A consequence of this proposal without the necessary safeguards will be for more flights over both the existing AONB and its extensions Natural England are proposing to submit for Government designation.</p>	<p>situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be apparent.</p>
Noise and Vibration	<p>Much of the Surrey Hills is elevated, up to 1,000ft, and therefore nearer an aircraft noise source than most other areas. A condition of any approval of the runway proposal should stipulate there be no additional flights over the existing Surrey Hills AONB and any extensions designated by the Government above existing baseline figures. A further condition could be that it should only be used by recognised and authorised quieter aircraft.</p>	<p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on tranquillity for landscape receptors, including with AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>.</p>

### 3.78 Surrey Wildlife Trust

3.78.1 Table 3.78.1 below sets out the Applicant's response to the issues raised within the RR from the Surrey Wildlife Trust [\[RR-4401\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.78.1 Applicant’s response to the matters raised by Surrey Wildlife Trust**

Topic	Matter raised in the RRs	The Applicant’s response
General – Opposition	On the basis of the available information, we OBJECT in principle to this DCO application. It is our understanding that “The Project proposes alterations to the existing northern runway at London Gatwick Airport (Gatwick) which, along with lifting the current restrictions on its use, would enable dual runway operations. Together with the alterations to the northern runway, the Project would include the development of a range of infrastructure and facilities to allow increased airport passenger numbers and aircraft operations.”	Noted.
Greenhouse Gases	The Trust has issued its corporate policy position statement on matters relating to Climate Change. This may be viewed online at; <a href="https://www.surreywildlifetrust.org/sites/default/files/2020-01/SWT%20Climate%20Change%20Position_1.pdf">https://www.surreywildlifetrust.org/sites/default/files/2020-01/SWT Climate Change Position_1.pdf</a> . Under ‘Sustainable Transport’ on page 2 of the statement, we clearly state that “..The Trust has and will continue to oppose local airport expansion that serves to facilitate growth in the volume of air travel”. Our justification for this then follows, but to summarise; we do not believe	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</p> <p><i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major</i></p>

	<p>that any aviation industry growth model based on a net increase in air travel is reconcilable with our committed national climate change mitigation targets (i.e. for achieving carbon neutrality), under present technological limitations. We hope that this position of ‘objection in principle’ can be noted. We anticipate making further representations as the DCO application progresses.</p>	<p><i>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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p> <p>With regards to the transportation of alternative fuels in a future scenario - it cannot be determined if this will indeed be the mechanism whereby supplies of energy for aircraft are brought for refuelling/recharging (an in some scenarios - e.g. electric aircraft - deliveries will be through electricity networks). The existing fuel regime requires transportation of liquid</p>
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		aviation fuel by road, and any increase in this arising from changes in aviation profiles is not expected to be so different in scale from existing patterns as to represent a significant impact.
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### 3.79 Sussex Wildlife Trust

3.79.1 Table 3.79.1 below sets out the Applicant’s response to the issues raised within the RR from the Sussex Wildlife Trust [[RR-4466](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.79.1 Applicant’s response to the matters raised by the Sussex Wildlife Trust**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
General – Opposition	Sussex Wildlife Trust is strongly against a second runway at Gatwick Airport, and is objecting to Gatwick Airport Limited’s DCO application on the following grounds	Noted.
Greenhouse Gases	The proposal is for a second runway at Gatwick, which will enable more flights and increase carbon emissions. This is in direct opposition to the UK’s legally binding net zero targets and the expert recommendations of the Climate Change Committee, which continues to advise ‘no net airport expansion across the UK.’ Contrary to Airports National Policy Statement.	The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government’s target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government’s most recent response responded to the Progress Report 2022.

		<p>In this most recent response to the CCC (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 (which explicitly includes the growth assumed as part of NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<b>Planning and Policy</b>	<b>The creation of a second operating runway at Gatwick</b>	<b>The application of planning policy for the Project is set out in the <b>Planning</b></b>

	is not supported by the Airports National Policy Statement.	<b>Statement</b> <a href="#">[APP-245]</a> . Most notably, Section 8.2 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> explains makes clear that whilst the Airport National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it does not in any way exclude Gatwick Airport from the policy encouragement to intensity its use and capacity.
Ecology and Nature Conservation	The type and total area of habitat being lost, and the subsequent mitigation and compensation, remain unclear.	The loss and gain, both in area and value, of each broad habitat type are described in Annex 3 of <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a> .
Ecology and Nature Conservation	Understanding biodiversity impacts beyond the site level at a landscape-scale is required to address the effects on ecological networks in terms of habitat connectivity and function. For example the woodland loss along the A23 and impacts on the wider landscape and supported species, including bats.	As set out in paragraph 9.4.9 et seq. of <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> , 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.). As such, the impact assessment has considered impacts outside the Order Limits, where there is the potential for such impacts to occur.  The impacts from the woodland loss along the A23 on ecology receptors (including bats) are assessed in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> . The conclusion is that there would be a medium term significant adverse effect until the replanting that will take place had matured at which point the level of effect would be reduced below that of significance.



Ecology and Nature Conservation	There will be a time lag between habitat loss and subsequent habitat creation and maturity (e.g. woodland), and the biodiversity impacts of this time lag are not clear.	The impact of this time lag is considered within Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034]. The conclusion is that there would be a medium term significant adverse effect until the replanting that will take place had matured at which point the level of effect would be reduced below that of significance.
Ecology and Nature Conservation	Clarity is required on Biodiversity Net Gain (BNG) delivery to ensure it is separate from and additional to requirements under the mitigation hierarchy.	The approach to BNG adopted within the Project is set out in <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> [APP-136]
Ecology and Nature Conservation	Insufficient information on the proposed monitoring and management of newly created habitats.	Monitoring and management of newly created habitats are described in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [APP-113, 114, 115 and 116].
Consultation	Sussex Wildlife Trust is concerned that the pre-application consultation relating to biodiversity has not been an effective and active process ahead of the DCO submission	Biodiversity was discussed and considered throughout the Topic Working Group process and then further through the NRP Biodiversity Sub-group. In both cases, the survey work completed and associated results were presented, the proposed habitat creation plans were discussed and mitigation required considered.

### 3.80 Swiss International Airlines

3.80.1 Table 3.80.1 below sets out the Applicant's response to the issues raised within the RR from Swiss International Airlines [RR-4480], including signposting to the relevant sections of the DCO Application.

**Table 3.80.1 Applicant’s response to the matters raised by Swiss International Airlines**

Topic	Matter raised in the RRs	The Applicant’s response
Capacity and Operations	As a Network Planner at SWISS I support the development plans at London Gatwick, as it would allow additional capacity to be released, enabling airlines to further develop their operations to this destination.	Support is welcome and noted. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new and existing airlines to launch new destinations in new markets.

### 3.81 TAP Air Portugal

3.81.1 Table 3.81.1 below sets out the Applicant’s response to the issues raised within the RR from TAP Air Portugal [[RR-4494](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.81.1 Applicant’s response to the matters raised by TAP Air Portugal**

Topic	Matter raised in the RRs	The Applicant’s response
General – Support	TAP Air Portugal would like to show their support to the Gatwick's Northern Runway Project. For TAP, LGW Airport is already really valuable to our operation, as we have more than 25 weekly frequencies during the Summer season with a slight decrease to 22 weekly frequencies in Winter. We are also noticing that the performances are improving	Noted. The Applicant welcomes TAP Air Portugal’s support for the Project.

	<p>from both Lisbon and Oporto hubs during the last seasons.</p>	
<p>Capacity and Operations</p>	<p>This project will not only allow for the current operation to be more stable, efficient and resilient, but it will also allow to improve the product offered to our clients, increasing the attractiveness of such flights. Considering the current operation, we have seen growth in pax volume, route profitability and also in the connecting passengers percentage from/to LGW through our worldwide network. Since we are a HUB and spoke carrier, we value greatly these connecting passengers and LGW operation. This data, if sustained and/or increased, through best usage of the existing infrastructure, improvements to the airfield, terminal facilities and access arrangements into the airport, shown in this project, resulting in better LGW Airport performances, will also allow for a potential expansion plan as we can consider some frequency increases onto LGW. This airport for us is not only a really good counterpart to LHR, but it can also be a good alternative to it, as LHR has already been showing signs of congestion. Since we</p>	<p>Support is welcome and noted. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new and existing airlines to launch new destinations in new markets.</p>

are very constrained both at slot and capacity levels in LHR, it is good to have possibilities to grow our presence in London not only with frequency increases but also with equipment upgauges, due to TAP's fleet renewal plan onto bigger aircrafts, and to improve even further our existing schedule, using our presence in London, even considering one night operation in the medium to long term. As London is one of our main feeders and one of our main European markets, our possibilities for growth would be concentrated in LGW, with a prospect of returning to the maximum historical market presence achieved in pre pandemic times. With this potential operation increase, the passenger experience would be of the utmost importance and the mentioned Airport improvements would not only comply to their expectations as it would also enhance the catchment area of the LGW airport, benefiting both Airport and Airlines. This also feels as a good timely opportunity for LGW to expand.

### 3.82 The Coal Authority

3.82.1 Table 3.82.1 below sets out the Applicant's response to the issues raised within the RR from the Coal Authority [[RR-4536](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.82.1 Applicant's response to the matters raised by the Coal Authority**

Topic	Matter raised in the RRs	The Applicant's response
General	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. As the site area lies outside the defined coalfield, the Planning team at the Coal Authority has no specific comments to make.	Noted.

### 3.83 Titan Airways

3.83.1 Table 3.83.1 below sets out the Applicant's response to the issues raised within the RR from Titan Airways [[RR-4625](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.83.1 Applicant's response to the matters raised by Titan Airways**

Topic	Matter raised in the RRs	The Applicant's response
General - Support	The London area is in desperate need of additional capacity to ensure the area is well served while retaining and growing connectivity. While we are Head Quartered	Noted. The Applicant welcomes Titan Airways' support for the Project.

	<p>at Stansted Airport we maintain a base at London Gatwick to ensure we can provide service to the south London area. As one of the UK's less known airlines we provide a range of services from sub charter services to the likes of TUI, easyJet and British Airways to VIP and corporate charters for individual groups, sporting teams and tour operators. Many of our flights are ad-hoc one off flights, and without sufficient capacity at Gatwick in the longer term we may struggle to provide the service we do today. We believe that the proposal is environmentally sound and has minimal impact on the local communities.</p>	
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### 3.84 Transport for the South East

3.84.1 Table 3.84.1 below sets out the Applicant's response to the issues raised within the RR from Transport for the South East [[RR-4663](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.84.1 Applicant's response to the matters raised by Transport for the South East**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant's response</b>
Traffic and Transport	The proposed expansion of Gatwick Airport will have significant impacts on the transport system in and around Gatwick Airport. These impacts must be addressed as part of the project.	Detailed assessments of the transport network have been undertaken to understand the impacts of the Project and this is set out in the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. The assessments include strategic and microsimulation highway modelling, rail assessment based on the strategic transport model, Legion modelling for Gatwick Airport rail station, and

		commentary on the committed improvements to active travel and bus and coach.
Traffic and Transport	<p>Many of the identified improvements in the surface access strategy are already planned and committed in National Highways and Network Rail’s investment programmes and should be supported these include:</p> <ul style="list-style-type: none"> <li>• M23 widening slip roads and adding a flyover for southbound traffic accessing the airport</li> <li>• M23 spur terminal roundabout re-sited to south of existing, grade separated to give separate access to existing south terminal, new terminal, and A23</li> <li>• A23 realigned to east of existing south terminal, grade separated junctions to M23 spur and north terminal</li> <li>• Gatwick Station redevelopment New high-level concourse with lift and escalator access from all platforms</li> <li>• Brighton Main Line upgrades</li> <li>• Various grade separated</li> </ul>	<p>Strategic transport modelling has been undertaken in accordance with DfT’s Transport Appraisal Guidance. As such, committed infrastructure improvements for surface access are included in the future baseline and with Project scenarios in the relevant years. The schemes which have been included are set out in <b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> [<a href="#">APP-260</a>].</p>

	<p>improvements including Windmill Bridge and Stoats Nest junctions, other, junction improvements and platform extensions to increase capacity and remove operating conflicts</p> <ul style="list-style-type: none"> <li>• An alternative solution to facilitate the improvements that a smart motorway scheme would have delivered at peak periods, junctions 8-10.</li> <li>• Lower Thames Crossing New Thames crossing east of London to increase road capacity.</li> </ul>	
<p>Traffic and Transport</p>	<p>Consideration should still be given to address approaching traffic from the surrounding road network into the A23/M23 corridor. We still have concerns that provision of safe and suitable access has not been demonstrated. We support WSCC in their request for evidence to support the potential impact of the speed limit reduction proposed on London Road (A23) to 40mph.</p>	<p>Strategic modelling has been undertaken for the region, as shown in Diagram 5.3.3 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a> which includes the roads approaching the A23/M23 corridor. The airport is well located to the strategic highway network and a large majority of airport traffic is expected to be using the M23 Spur and the M23. Highway improvements are proposed and these are subject to Road Safety Audits.</p> <p>Microsimulation modelling of the local highway network presented in <b>Transport Assessment Annex C:VISSIM Forecasting Report</b> <a href="#">[APP-261]</a> demonstrates that the reduction in</p>



		<p>speed limit does not have a detrimental impact on network speeds along the A23 corridor or more generally.</p>
<p>Traffic and Transport</p>	<p>Changes to highway proposals were made following GAL’s Autumn 2021 consultation. However, the changes do not appear to have incorporated sufficient additional measures to make sustainable modes of travel more attractive to staff and passengers. It is not clear how they will contribute to the objectives of increasing the proportion of passengers using sustainable forms of transport from 48% in 2020 to 55% by 2030. GAL’s commitment to ensure a minimum 55% (Environmental Statement) or 60% (Surface Access Strategy Oct 2022) of passenger journeys are made by public transport is not ambitious enough. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months to March 2020. Currently the majority of journeys to and from Gatwick are made by car. This is in part due to the limitations of public transport options despite being on the Brighton Mainline. It must be ensured that GAL honour their</p>	<p>The mode share commitments for the Project are set out in <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b>, which states the commitment to achieve a minimum of 55% of air passenger journeys to and from the Airport to be made by public transport by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter.</p> <p>The surface access improvements include a range of improvements for walking and cycling, as set out in Section 2.2 of the <b>Transport Assessment [AS-079]</b>.</p> <p>The mode share commitments are informed by strategic modelling work which includes the measures set out in Chapter 7 of the <b>Transport Assessment [AS-079]</b> and committed in <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b>.</p>

	<p>commitments including the provision of new bus services, Improved bus connections will enable longer distance inter-urban journeys. But there must also be a commitment to increase the attractiveness of alternate modes.</p>	
Traffic and Transport	<p>An undertaking for ongoing liaison with all public transport operators would increase understanding of travel behaviour and how it could be changed in the future. The delivery of the scheme and plans for surface access must maintain a consideration of government targets for decarbonisation and how they will contribute to achieving net zero aspirations for 2050.</p>	<p>This is noted and GAL undertakes regular engagement with operators as part of its current Airport Surface Access Strategy and will continue to do so. GAL has also engaged with operators in relation to the proposals which form part of the Project.</p>
Traffic and Transport	<p>TfSE welcomes the reduction of additional car parking provision at the airport following their Autumn 2021 consultation to 6,570 new spaces (potential further 1,100 may be added later). TfSE still question this level of increased parking with the forecast increase in passenger movements being accommodated through investment in more sustainable forms of travel. ES Appendix 9.9.2 Biodiversity Net Gain Statement (Doc Ref. 5.3) states that the project overall</p>	<p>To clarify the car parking numbers, the 6,570 new spaces are committed and approved car parks which will be delivered in the future baseline (i.e. without Project). The Project will result in some loss of car parking which will be replaced, and the total overall net increase as the result of the Project is 1,100 spaces. These car parking numbers are included in the strategic transport model which has informed the committed mode shares. This is set out in Chapter 7 of the <b>Transport Assessment [AS-079]</b>. GAL will provide these spaces over a period of time as demand requires. The Project includes extensive new habitat creation and enhancement that</p>

	promises >20%. We would expect to see a continued commitment to biodiversity net gain as part of any new parking provision and considered as an integral part of any surface access plans for modal shift and meeting the future decarbonisation targets mentioned above.	has led to an overall net gain of circa 20% ( <b>ES Appendix 9.9.2 Biodiversity Net Gain Statement</b> [ <a href="#">APP-136APP-136</a> ]).
Traffic and Transport	Additional freight movements, as a result of the Northern runway, should also be considered not just within the airport boundary but in the surrounding area. Driver welfare and parking facilities should be provided or made provision for in the vicinity of Gatwick to avoid any adverse effect on surrounding local roads.	Freight movements have been considered, as set out in Chapter 16 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]. These movements are included in the strategic modelling work which is set out in Chapter 12 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ].

### 3.85 TUI

3.85.1 Table 3.85.1 below sets out the Applicant's response to the issues raised within the RR from TUI [[RR-4681](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.85.1 Applicant's response to the matters raised by TUI**

Topic	Matter raised in the RRs	The Applicant's response
Capacity and Operations	TUI Airways is one of Gatwick's largest airlines operating short, mid and long-haul flights to leisure destinations around the Europe and the rest of world. Our interest in the project is around the potential impact on our customers and	The Northern Runway Project is privately funded in its entirety. For more detail, please refer to the <b>Funding Statement</b> [ <a href="#">APP-009</a> ].  <b>The Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity.

	<p>business operations. Of particular interest:</p> <ul style="list-style-type: none"> <li>- ensuring cost-effective infrastructure available to accommodate extra movements and passengers enabled by second runway.</li> <li>- impact on our ability to maintain/improve core service standards</li> <li>- whether plan enables airport to maintain a competitive commercial cost base with the marketplace</li> <li>- whether surface access plan is sufficient to cope with additional passengers and business operations associated with increased movements</li> <li>- provision for our operational staff</li> <li>- including car parking, accommodation and public transport</li> <li>- approach to distribution of increased capacity</li> <li>- compatibility of proposal with airport's climate change commitments</li> <li>- economic opportunities the project will enable, including potential for additional services and jobs by TUI.</li> </ul>	<p>The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Demand for slots at London Gatwick continues to be oversubscribed. The Northern Runway Project will allow the release of new slot capacity which will facilitate take up by existing and additional carriers and enable airlines to launch new destinations in new markets. Overview of the proposed infrastructure for NRP is included in <b>Design and Access Statement</b> [<a href="#">APP-253</a>, <a href="#">254</a>, <a href="#">255</a>, <a href="#">256</a> and <a href="#">257</a>], submitted with the application.</p> <p>GAL has submitted details of proposed surface access improvements to meet the needs of future passengers in the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The economic benefits of the project are considered in <b>ES Chapter 17: Socio-Economic</b> [<a href="#">APP-042</a>].</p>
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### 3.86 Tunbridge Wells Borough Council

3.86.1 Table 3.86.1 below sets out the Applicant's response to the issues raised within the RR from Tunbridge Wells Borough Council [[RR-4683](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.86.1 Applicant's response to the matters raised by Tunbridge Wells Borough Council**

Topic	Matter raised in the RRs	The Applicant's response
General	Referred back to consultations responses submitted as part of the previous consultations.	Noted.

### 3.87 UK Health Security Agency

3.87.1 Table 3.87.1 below sets out the Applicant's response to the issues raised within the RR from UK Health Security Agency [[RR-4687](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.87.1 Applicant's response to the matters raised by UK Health Security Agency**

Topic	Matter raised in the RRs	The Applicant's response
Health and Wellbeing	<p>The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID.</p> <p>Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health.</p> <p>On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to</p>	Noted and welcomed.

	register an interest with the Planning Inspectorate on this occasion.	
Health and Wellbeing	UKHSA welcomes the presentation of population exposure to noise in several different formats and metrics – both in absolute terms and as change with and without the project – for a central case and a slower transition to quieter aircraft.	Noted and welcomed.
Health and Wellbeing	UKHSA welcomes the Applicant’s acknowledgement of the strong link between transport noise and adverse health outcomes (for example 18.8.96), and the acknowledgement that noise effects can be considered to have non-threshold effects (18.8.98).	Noted and welcomed.
Health and Wellbeing	UKHSA welcomes the detailed consideration of noise in the Health and Wellbeing Chapter (5.1 Ch.18) (including reiterating key conclusions from the noise chapter).	Noted and welcomed.
Health and Wellbeing	UKHSA welcomes the consideration of recent scientific evidence on the health effects of noise (Appendix 18.4.1).	Noted and welcomed.
Health and Wellbeing	The Applicant has chosen to present the quantitative	Noted. This point relates to the EIA methods in general. “ <i>The EIA must</i>

	<p>health impact assessment of noise effects (Table 18.8.24 and Appendix 18.8.1) solely as the difference with and without the Scheme. UKHSA would have preferred if the health effects of a future expanded Gatwick were also presented in absolute terms.</p>	<p><i>identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development</i>" (The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, paragraph 5(2)). The EIA therefore considers the change due to the project as explained in <b>ES Chapter 6: Approach to Environmental Assessment</b> [APP-031]. This is consistent with the <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] approach of assessing the difference with and without the Project.</p> <p>Notwithstanding the baseline disease and mortality rates used in the quantitative noise health impact calculation are set out in <b>ES Appendix 18.4.1: Methods Statement for Health and Feedback</b> [APP-205] Table 3.3.4 (second column). The absolute rates would therefore be the sum of these rates and those in Table 18.8.24.</p> <p>For example, in relation to stroke incidence, the baseline rate is 116.1 per 100,000 population and the additional contribution of the project is 0.135 per 100,000 population, given a total absolute rate of 116.235 per 100,000 population.</p>
<p>Health and Wellbeing</p>	<p>UKHSA also encourages the Applicant to present the number of people estimated to be highly annoyed and highly sleep disturbed (in</p>	<p>Noted. The quantification of health outcomes in <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] aims to provide an indication of scale of change in health outcomes, not to</p>

	<p>addition to the associated monetary values shown in Table 14.12.2).</p>	<p>exhaustively estimate all health outcome changes. The modelling fulfils this function and is proportionate in providing indicators relevant to the scale of change in physical and mental health outcomes. The indicators selected avoid double counting, for example hypertension may ultimately lead to outcomes such as stroke and IHD and similarly annoyance and sleep disturbance may ultimately lead to depression as an outcome.</p> <p>Notwithstanding this, estimates of people highly annoyed and highly sleep disturbed were presented in the Preliminary Environmental Information Report <b>ES Chapter 18: Health and Wellbeing Table 17.9.8 [APP-043]</b> <a href="https://www.gatwickairport.com/company/reports/northern-runway-reports.html">https://www.gatwickairport.com/company/reports/northern-runway-reports.html</a>.</p> <p>These estimates were not included in the ES health outcome quantification as there is an equivalent assessment in <b>ES Chapter 14: Noise and Vibration [APP-039]</b>, and also annoyance and sleep disturbance quantification uses a different formula to that agreed with the Health Topic Working Group as an appropriate and proportionate basis for estimating the scale of change in health outcomes.</p> <p>The reasons that the highly annoyed and highly sleep disturbed metrics were not reported in the <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> is further explained in paragraphs</p>
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		<p>18.8.98 to 18.8.100 of <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>].</p> <p>Notwithstanding these points, annoyance and sleep disturbance have been taken into account qualitatively by the health assessment conclusion on significance, as confirmed in paragraph 18.8.163 of <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>].</p>
Health and Wellbeing	<p>Given current uncertainties in the exposure response relationships (ERRs) for these two health endpoints, UKHSA recommends that sensitivity analyses are carried out for these estimates (e.g. using ERRs from the 2018 WHO Noise Guidelines).</p>	<p>Noted. As above these outcomes have been taken into account by the health assessment <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>]. Whilst a sensitivity test could be undertaken, this is not considered proportionate and is not considered to change the agreed position that there are unlikely to be significant adverse impacts to public health. An awakenings study, which relates to quantifying sleep disturbance, is included in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>], which uses metrics and dose-responses from the WHO commissioned systematic review (Basner, 2018), as suggested by UKHSA in their comments on the Preliminary Environmental Information Report.</p>
Health and Wellbeing	<p>UKHSA welcomes the WebTAG assessment (Table 14.12.2). The Applicant is encouraged to provide more detail about the significance of these values in Chapter 14 and Chapter 18, and to acknowledge that this</p>	<p>Noted. WebTAG is a tool for supporting strategic Government policy decision options appraisal, it is not a part of EIA methodology. The IEMA guidance on determining significance for Human Health in EIA sets out the methodology, as explained in section 18.4 of <b>ES Chapter 18: Health and</b></p>

	assessment was based on scientific evidence that is approximately 20 years old.	<b>Wellbeing</b> [ <a href="#">APP-043</a> ]. The WebTAG analysis is noted, the WebTAG conclusions provide a monetary valuation, which for interpretation should be considered in the context of both the beneficial and adverse effects, see <b>Need Case Appendix 1: National Economic Impact Assessment</b> [ <a href="#">APP-251</a> ] where this is presented. The valuations in this context align with the conclusions on significance in <b>ES Chapter 18: Health and Wellbeing</b> [ <a href="#">APP-043</a> ].
Health and Wellbeing	UKHSA cautiously welcomes the awakenings due to noise assessment, but has reservations on how the narrative and results have been presented.	Noted. This links with the earlier point that EIA considers the change due to the Project. The relevant assessment is therefore the number of additional awakenings that are due to the Project change, i.e. are in addition to normal awakenings and awakenings without the Project. Any difference in interpretation of how additional awakenings are framed is not considered to change the results of the study given in <b>ES Chapter 14: Noise and Vibration</b> [ <a href="#">APP-039</a> ] or <b>ES Chapter 18: Health and Wellbeing</b> [ <a href="#">APP-043</a> ] conclusion that there would not be a significant public health effect.
Noise and Vibration	UKHSA encourages the Applicant to consider replicating the approach taken in that paper [Basner et al.], were contours of one, two and three additional awakenings due to the total noise from a future year Gatwick are generated and presented. These can then	As explained above the EIA is required to describe the likely significant effects of the Project, ie due to the increases in noise it is expected to create, rather than the total impact of the airport in a future year. In the case of awakenings study has demonstrated that in the worst case year, 2032, the increase in night flights from 125 to 132 would create less than 1 awakening (0.8) at

	<p>be compared with the contours that are informing the project's Noise Insulation Scheme.</p>	<p>the worst affected dwellings so it would not be possible to plot contours for 1, 2 and 3 additional awakenings.</p>
Noise and Vibration	<p>The Applicant is also encouraged to clarify and/or correct the statement in 14.4.51 that "N60 night gives an indication of the number of aircraft noise events on an average summer night that are above peak noise levels that might begin to cause disturbance to sleep indoors with windows open".</p> <p>Referring to Figure 6 in the Basner &amp; McGuire paper used by the Applicant to carry out the awakening assessment, and assuming an outdoor to indoor sound level difference of 10dB for open windows, N50 (outside) would have been a more appropriate metric to capture the majority of aircraft events that might cause disturbance to sleep.</p>	<p>We appreciate UK HSA would wish to take a conservative approach to assessing potential for sleep disturbance and a cautious choice of dose/response relationships is available. This would suggest plotting N50 levels to indicate night noise impact counter the CAA guidance in CAP1616. In the UK British standards such as BS8233 refer to Lmax 45dB noise levels internally, and it is conventional to use a 15dB level difference for a partially opening window (windows are rarely fully open) leading to Lmax 60dB outside, as for example recommended in the Pro-PG Planning and Noise (<a href="https://www.gov.uk/guidance/noise--2">https://www.gov.uk/guidance/noise--2</a>) as the threshold to be exceeded 10 times a night (ie N60 10) for scoping sites for impacts of noise events at night.</p>
Health and Wellbeing	<p>UKHSA notes the reference to the Department for Transport (2017) publication for the setting of a LOAEL of 51dB LAeq,16hr for air noise. As noted in 14.2.52, the SONA study found that 7% of the sampled population living around UK airports in 2014 were highly annoyed at this level. This should have been</p>	<p>Noted. <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] paragraph 18.8.98 confirms that non-threshold noise effects have been taken into consideration in the noise health assessment. The approach of setting of a LOAEL level is in line with national noise policy. The sensitivity of vulnerable groups has been specifically noted in paragraph 18.8.129, including sensitivity to effects</p>

	<p>acknowledged in the Health and Wellbeing chapter, together with recognition that the chosen LOAEL for the Scheme is not likely to protect more vulnerable subgroups, including those that are highly noise sensitive.</p>	<p>even below thresholds that are generally considered acceptable. This group has the highest sensitivity rating that can be assigned under the methodology, and this is taken into account in the conclusion of population health significance.</p>
Health and Wellbeing	<p>In 14.4.66 the Applicant has expressed their choice for an air noise SOAEL (63dB LAeq,16hr) in terms of the percentage of the population highly annoyed at this level according to the SONA 2014 survey. UKHSA encourages the Applicant to also indicate the estimated increased risk at this level for stroke, IHD and depression, based on the evidence in Table 3.3.2 in Appendix 18.4.1.</p>	<p>Noted. <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] Table 18.8.24 sets out this information as the sum for all noise contours used by Chapter 14. This is therefore a more conservative assessment than just the SOAEL contours. As noted above, this is an indicative scale of effect calculation. The addition of the proposed metric would not change the <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] conclusion that there would not be a significant public health effect.</p>
Noise and Vibration	<p>On noise envelopes, 14.9.185 states that “The LOAEL contours have been chosen because they represent the lowest level of observable effects during the day and night...” This statement contradicts paragraph 14.2.52 and the growing body of evidence suggesting that adverse effects occur below 51dB LAeq,16hr. UKHSA encourages the Applicant to continue engaging with local stakeholders to define a</p>	<p>Noted, 14.2.52 gives a fuller explanation of LOAEL and makes it clear that there can be effects below it, whereas para 14.9.185 refers to the LOAEL level used on policy without this detail. GAL has engaged with the community and other stakeholders extensively on the Noise Envelope and found a variety of views on this point. GAL also noted in its consultation that there is a reasonable correlation between the areas of Leq 16 hr at different levels (51, 54, 57dB etc) so to some extent controlling one controls the other lower levels. Paragraph 14.9.185 also goes on to say that Leq</p>

	<p>noise envelope that best meets their needs. On the topic of forecast noise levels (14.9.198), it may also be useful for the Applicant to commit to looking retrospectively and checking the accuracy of previous forecasts, which could help improve the level of confidence and trust in this initiative amongst community groups. In Section 14.2 the Applicant points to legal precedent to argue that noise insulation addresses policy requirements.</p>	<p>16 hr 51 and Leq 8 hr 45 'can be modelled with reasonable accuracy so as to provide forecasts of future performance'. Modelling contours below ie larger than, these levels becomes less accurate. This point was made strongly by one local authority who favoured Leq 16 hr 54dB and Leq 8 hr 48dB. We note these are the levels currently proposed in the Luton airport development project Noise Envelope proposal. We are confident the ANCON model for Gatwick is accurate to model the LOAEL contours and that these are the best levels to use for the Noise Envelope.</p> <p>Section 7.4 of the <b>ES Appendix: 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a> provides for independent expert review of the NTK data used to verify the ANCON noise model. This was included at the request of a local authority. The <b>ES Appendix 14.8.7: The Noise Envelope</b> <a href="#">[APP-177]</a> also requires, in Section 7.2, actions plans to look retrospectively if noise levels exceeded those predicted.</p>
<p>Noise and Vibration</p>	<p>UKHSA welcomes noise insulation as a last resort mitigation measure. However, the Applicant should be transparent on the many limitations of such a mitigation measure, and on the significant uncertainties whether noise insulation will mitigate the adverse effects identified. Such a discussion</p>	<p>Noted, whilst noise insulation has been used to mitigate significant effects on large infrastructure projects, we note none have evaluated their effectiveness.</p> <p>The current noise insulation scheme was reviewed in 2019 and the findings of that review have been fully considered in developing the new scheme that accompanies the Project.</p>

	<p>would be particularly relevant to Chapter 18. For many decades large infrastructure projects in the UK have specified noise insulation measures as a mitigation measure, however none of them have evaluated their effectiveness to protect health. As a result, we have very little good quality evidence to confirm whether sound insulation schemes are effective to protect health, and the extent of unintended consequences. For example, sound insulation may reduce indoor noise levels at the expense of poorer indoor air quality and increased risk of overheating.</p>	<p>The proposed scheme is described in <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a> including enlarging the area covered from around 2,000 homes to 4,300 homes, a more comprehensive package on insulation, higher sums of money offered across the range of noise levels encountered, and ventilation to allow windows to be kept closed in summer. Local Authorities have asked for further details of the scheme including how it will be implemented, and GAL is working with the Noise Topic Working Group to provide this.</p>
<p>Noise and Vibration</p>	<p>In the consideration of changes to the assessment because of climate change, the Applicant states that “changes in climate could increase heatwave in the summer months... The proposed enhanced NIS for homes within the forecast 54 dB LAeq,16hr daytime air noise contour includes acoustic ventilators to allow residents to keep windows closed.” How confident is the Applicant that current technology of acoustic ventilators can provide sufficient airflow to cool a building in a heatwave, whilst</p>	<p>Modern adjustable acoustic ventilators can provide high levels of air flow when adjusted to their maximum settings. Clearly in extreme conditions, ventilation may not be adequate, although in such conditions advice seems to be to keep windows closed with curtains drawn <a href="https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather">https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather</a>. The need to open windows on rare occasions, particularly during the day, due to heat, smell, fumes etc, does not negate the overall benefit of providing acoustic insulation and acoustic ventilators nor lead to significant effects.</p>

	also ensuring sufficient attenuation to noise ingress from outside?	
Health and Wellbeing	Under the subheading of “Thresholds and non-threshold effects”, 18.8.112 states that “The number of people experiencing noise effects at or above the SOAEL is a guide for the health assessment as to the potential for health effects within a population.” UKSHA does not agree with this statement. A health assessment should consider all adverse effects above the level where adverse effects are known to occur. By definition, this is the LOAEL not the SOAEL. Indeed, the concept of a SOAEL does not exist in conventional health risk assessment.	Noted. EIA considers the potential for ‘significant’ effects and the Government Noise Policy Statement for England defines the SOEAL as the “ <i>the level above which significant adverse effects on health and quality of life occur.</i> ” The SOAEL is therefore a key guide for the EIA Human Health assessment. Notwithstanding this point, while it is the case that <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> paragraph 18.8.112 states that the number of people experiencing noise effects at or above the SOAEL is a guide for the health assessment as to the potential for health effects within a population. It also goes on to state in paragraph 18.8.113 that “ <i>the changes in exposure between the LOAEL and SOAEL are noted, as chronic noise exposure across all or the great majority of the population may also contribute to adverse population health outcomes</i> ”. The health assessment health assessment does consider all adverse effects above the level where adverse effects are known to occur, i.e. the LOAEL, as well as not-threshold effects as discussed above.
Health and Wellbeing	The same paragraph also states that “the great majority of changes are no greater than 2dB, which suggests that the additional noise would not be noticed by most people and would have limited potential to affect	Noted. It is agreed that <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> does consider the contextual factors that relate to noise sensitivity. The <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> statements about the change in noise values provide relevant context to the effects of the

	<p>population health.” The “rule of thumb” that a change of 3dB is barely noticeable is questionable, and many would argue that it is not applicable to an intermittent source such as aviation noise. An increase of 2dB is roughly equivalent to a 60% increase in the number of flyovers (everything else being equal), and it is debatable whether such an increase “would not be noticed by most people”. The extent to which such an increase affects population health will depend on several factors, including the existing level of exposure, the current state of health of that population, and other contextual factors (as indeed stated in Chapter 18).</p>	<p>Project, i.e. the change relative to LOAEL and SOEAL. <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] does not rely on the “rule of thumb” that a change of 3dB is barely noticeable to conclude that there would not be a significant public health effect. <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] aligns with the ES Chapter 14: Noise and Vibration [App-039] approach to having regard to noise changes as one factor within the assessment, see paragraphs 14.4.72, 14.4.73 and 14.4.78.</p>
<p>Noise and Vibration</p>	<p>Paragraph 18.8.225 states that the only monitoring the Applicant is committed to carry out is Flight Performance reports, annual Noise Contour Reports, and annual reporting against the Noise Envelope limits. Given the uncertainties associated with flightpaths, fleet transitions, the main mitigation strategy (noise insulation), and the ineffectiveness of this mitigation on noise exposure outdoors, UKHSA</p>	<p>As listed, Gatwick Airport carried out a considerable amount of noise monitoring. The Noise Action Plan requires various monitoring and reviews in addition, and the Noise Management Board workplan adds monitoring and research projects to this from which all stakeholders learn.</p> <p>GAL understands UKHSA would like to see a survey into the effectiveness of noise insulation, but would question whether this Project is the most appropriate to monitor, given that the extent of significant noise effects is relatively small, including at night.</p>



	<p>recommends a commitment for monitoring: A) the effectiveness of sound insulation to deliver healthy indoor environments and reduce noise-induced awakenings in practice (taking into account real-life ventilation practices); and B) annoyance and self-reported sleep disturbance in the community at discrete milestones throughout the project’s construction and operation phases. UKHSA would be happy to discuss with the Applicant how this can be delivered in a proportionate way to the scale of negative environmental impacts and the predicted economic benefits.</p>	<p>UKHSA will be aware of ongoing work in this area and the complexities of carrying out such a study at Gatwick.</p>
Noise and Vibration	<p>14.4.86 mentions a mental health facility, however it is not clear how effects on this facility have been judged and, if necessary, mitigated</p>	<p>Farmfield Hospital, Farmfield Dr Horley, RH6 0BN was assessed for ground noise within Assessment Area 4 Farmfield that takes its name. It was also a baseline noise monitoring site, see <b>ES Appendix 14.9.6: Ground Noise Baseline</b> [<a href="#">APP-176</a>] No significant effects are reported in Assessment Area 4 and it is 500m outside the air noise LOAEL used to scope air noise effects.</p>
Noise and Vibration	<p>Table 14.4.2 states that consideration of Quiet Areas has been scoped out – this seems odd given the geographical area where Gatwick is situated and the</p>	<p>GAL wrote to all the Local Authorities on Noise Topic Working Group in July 2022 asking if they had declared any Quiet Areas under the Environmental Noise (England) Regulation. Two replied but, the others did not reply.</p>

	<p>spatial extent of the noise assessment. Can the Applicant clarify if or to what degree stakeholder engagement (including local communities) influenced this decision?</p>	
Noise and Vibration	<ul style="list-style-type: none"> <li>It is not clear if future people living in the different “Tiers” of proposed future development identified in the Cumulative Effects section of Chapter 14 are included in the population exposure to noise tables in Chapters 14 and 18.</li> </ul>	<p>No, because they are not built, they may not be, and as explained in para 14.11 15 of <b>ES Chapter 18: Health and Wellbeing</b> [APP-043], sites that do come forward for new housing and could be affected by noise would need to do so with noise mitigation within their designs.</p>
Health and Wellbeing	<p>18.8.94 states that BS 5228-1:2009 and BS4142:2014 set out “Regulatory thresholds for health protection”. The Applicant should clarify that these standards are based on professional judgement, and are not based on any recent epidemiological evidence.</p>	<p>Noted. Paragraph 18.8.94 of <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] states that ‘regard’ has been had to the BS 5228-1:2009 and BS4142:2014 standards (which are the current standards), alongside other evidence sources including current scientific literature. It is agreed that BS 5228-1:2009 and BS4142:2014 do predate more recent literature publications, and for this reason the recent literature has also been taken into account and is summarised in paragraph 18.8.96 [APP-043]. This includes key points from the World Health Organization (2018) and Peris &amp; Fenech (2020).</p>
Health and Wellbeing	<p>In 18.8.97, the Applicant should acknowledge that whilst SoNA 2014 failed to find associations between aircraft noise and self-reported health, it did find</p>	<p>Noted. It is agreed that SoNA 2014 reports:</p> <ul style="list-style-type: none"> <li>“<i>there is a relationship between self-reported health rating and annoyance score</i>” (paragraph 6.3).</li> </ul>

	<p>associations between noise annoyance and self-reported health. This is consistent with several other international studies .</p>	<ul style="list-style-type: none"> <li>• <i>“there is no relationship between self-reported health rating and aircraft noise exposure level”</i> (paragraph 6.5).</li> <li>• <i>“there is a relationship between self-reported well-being score and annoyance”</i> (paragraph 6.7).</li> <li>• <i>“there is no relationship between self-reported well-being score and aircraft noise exposure level”</i> (paragraph 6.8).</li> </ul> <p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043] section 18.8, paragraph 18.8.97 also discusses several other literature sources to contextualise the state of aetiological (causation) evidence between aviation noise and health outcomes.</p>
<p>Health and Wellbeing</p>	<p>In 18.8.102, the Applicant should correct the statement about noise complaints – the PHOF indicator B14a represents the rate of complaints to local authorities on neighbour and neighbourhood issues, and has no relevance to transportation noise.</p>	<p>Noted. It is agreed that the data is based on reported noise complaints made to Local Authorities. The definitions page for this Government indicator places the indicator in the context of Noise Policy Statement for England. The definition also states under caveats about the completeness of the dataset that that <i>“Some complaints are made directly to the perceived source of the noise e.g. Network Rail, Airports and Highways Authorities.”</i> This suggests that the indicator is not limited to only neighbourhood issues.</p> <p><a href="https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/6/gid/1000041/pat/159/par/K02000001/ati/15/are/E920">https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/6/gid/1000041/pat/159/par/K02000001/ati/15/are/E920</a></p>

		<p><a href="#">00001/iid/11401/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1</a></p> <p>Notwithstanding this point, it is not considered that this one baseline indicator changes the position on the conclusions of the health assessment.</p>
<p>Health and Wellbeing</p>	<p>It would have been helpful if the population exposure tables in Chapter 18 were presented in terms of Lden, which is the metric used in most of the epidemiological evidence on the health effects of noise. It would also be helpful if the Applicant clarifies what metric was used for the analysis described in Appendix 18.4.1.</p>	<p>Noted. To be consistent with the presentation of the analysis in <b>ES Chapter 14: Noise and Vibration [APP-039]</b> the <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> uses the same primary metrics of L<sub>Aeq,16h</sub> and L<sub>Aeq,8h</sub>. <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> paragraph 18.8.109 confirms that results reported in <b>ES Chapter 14: Noise and Vibration [APP-039]</b> in terms of L<sub>den</sub> have been taken into account.</p> <p><b>ES Appendix 18.4.1: Methods Statement for Health and Wellbeing [APP-205]</b> and <b>ES Appendix 18.8.1: Quantitative Health Assessment Results [APP-208]</b> use concentration response functions from the noise literature expressed in Lden and the modelling results from <b>ES Chapter 14: Noise and Vibration [APP-039]</b> expressed in LAeq. The indicators and formular agreed with the Health Topic Working Group for proportionately establishing scale of change in health outcomes relate to daytime noise exposures. In this context it is considered appropriate to use Lden and LAeq,16h together in this way. Similar approximations that assume Lden is approximately equal to LAeq,16h are made with Government tools</p>

		<p><a href="https://www.gov.uk/guidance/noise-pollution-economic-analysis#noise-modelling-tool">https://www.gov.uk/guidance/noise-pollution-economic-analysis#noise-modelling-tool</a>.</p> <p>Notwithstanding this point, the use of a concentration response coefficient in Lden (a 24 hour measure) with the daytime LAeq (16 hours measure) is likely to be a conservative assessment as the Project change is greater in the daytime than the night-time. The use of change in LAeq (rather than Lden) is therefore unlikely to overestimate the health outcomes.</p>
<p>Health and Wellbeing</p>	<p>18.8.130 seems to suggest that the Applicant is certain that noise insulation will reduce adverse health outcomes. The Applicant should provide details of which epidemiological evidence they are basing this assumption on.</p>	<p>Noted. It is agreed the epidemiological evidence base is not complete on the specific issue of noise insulation evaluation studies in the context of aviation noise. Consistent with the IEMA methods of the health assessment, the approach is to triangulate evidence to support a reasoned professional judgement. For example, the issue of noise attenuation is more one of physics than epidemiology. It is widely accepted that building fabric is an effective means of controlling noise, see for example the 'NHS England Health Technical Memorandum 08-01: Acoustics' for use of insulation for controlling noise in the design of healthcare buildings. Furthermore, the Government guidance on noise (<a href="https://www.gov.uk/guidance/noise--2">https://www.gov.uk/guidance/noise--2</a>) notes in terms of how planning can mitigate adverse effects that noise insulation, i.e. "<i>optimising the sound insulation provided by the building envelope</i>", is one of the four types of</p>

		<p>mitigation that can be applied. The provision of such mitigation is consistent with the Government’s Overarching Aviation Noise Policy (2023) that noise mitigation can contribute to reducing total adverse effects of noise. The <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> assessment of noise is however conservative and does not assume that insulation will be fully effective in all circumstances, including due to behavioural factors. Chapter 18 notes at paragraph 18.8.172 that a “<i>minor adverse [rather than negligible] effect is considered appropriate to reflect that not all people would take up the [noise insulation] scheme and there may be practical limitations on its effectiveness for some people, eg for structural reasons, outdoor activities or due to personal choice to open windows in summer even where ventilation is provided</i>”. In reaching this conclusion <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> paragraph 18.8.129 takes into account that the high sensitivity population includes those particularly sensitive to the Project’s noise, including below thresholds that are generally considered acceptable. The conservative assessment approach and triangulated evidence is considered to provide a pragmatic and robust professional judgement on this point.</p>
Noise and Vibration	UKHSA has assumed that all noise metrics are A-weighted, it would have been good if	This is noted in Table 14.15.1 Glossary of Terms of <b>ES Chapter 14: Noise and Vibration [APP-039]</b> .

	the acoustic metric notation made this explicit rather than implicit.	
Noise and Vibration	<b>ES Chapter 14: Noise and Vibration</b> [APP-039] refers to best practicable means (BPM) to control noise and vibration from construction. BPM is a legal defence against enforcement action for nuisance, such as noise. Health effects can still occur even when BPM is achieved.	Noted.

### 3.88 Virgin Atlantic Airways

3.88.1 Table 3.88.1 below sets out the Applicant's response to the issues raised within the RR from Virgin Atlantic Airways [RR-4737], including signposting to the relevant sections of the DCO Application.

**Table 3.88.1 Applicant's response to the matters raised by Virgin Atlantic Airways**

Topic	Matter raised in the RRs	The Applicant's response
General	Virgin Atlantic is registering an interest as a slot holder at Gatwick Airport and an employer based near to the site.	Noted.

### 3.89 Warnham Parish Council

3.89.1 Table 3.89.1 below sets out the Applicant's response to the issues raised within the RR from Warnham Parish Council [RR-4751], including signposting to the relevant sections of the DCO Application.

**Table 3.89.1 Applicant's response to the matters raised by Warnham Parish Council**

Topic	Matter raised in the RRs	The Applicant's response
Noise and Vibration & Air Quality	Are Concern is the negative impact on our parish from aircraft noise, pollution and extremely low flying planes	<b>ES Chapter 13: Air Quality</b> [APP-038] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport

		<p>sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would not be significant. This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce them slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the <b>ES</b></p>
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		<b>Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a> .
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### 3.90 Waverley Borough Council

3.90.1 Table 3.90.1 below sets out the Applicant’s response to the issues raised within the RR from Waverley Borough Council [\[RR-4755\]](#), including signposting to the relevant sections of the DCO Application.

**Table 3.90.1 Applicant’s response to the matters raised by Waverley Borough Council**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Greenhouse Gases	Waverley Borough Council is concerned that this project will not contribute to the goal of net zero emissions by 2050. This development, in construction phase and at operational stage, will produce unacceptable levels of direct and indirect carbon emissions.	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>The potential scale of future emissions from the aviation sector, and the commitment to achieve emissions reductions in line with the UK carbon targets, is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</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. The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation</i></p>

		<p><i>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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<b>Ecology and Nature Conservation</b>	<p>This proposal will have a negative impact on the natural environment and protect habitats across a wide area</p>	<p>The impact of the Project on ecology has been fully assessed through the Environmental Impact Assessment process, the results of which are set out in <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] of the Environmental Statement. The assessment process was based on detailed ecology surveys undertaken over a period of four years (2019 to 2023), the results of which are set out in the various appendices to Chapter 9. The assessment process followed good practice guidelines and considered all Important Ecological Resources identified. This includes designated sites, habitats and flora/fauna. No residual significant</p>

		<p>adverse effects were identified with the overall conclusion of the assessment that the Project would have a net benefit for ecology, as demonstrated by the circa 20% Biodiversity Net Gain.</p>
<p>Greenhouse Gases</p>	<p>The increase in flights will increase passenger travel to the site by car -increasing emissions and negatively impacting on the environment Government's watering down of the route to net zero in September 2023 may mean that assumptions used in technical assessments to support this submission are now incorrect and therefore PINS should ask the applicant to revisit the submission.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>There has been no diminution in the Government's commitment to limit and reduce aviation carbon emissions. The Government's recent Jet Zero Strategy - one year on makes clear the continuing commitment and the range of detailed initiatives being developed to ensure that the Government's commitment is achieved.</p>

### 3.91 West Hoathly Parish Council

3.91.1 Table 3.91.1 below sets out the Applicant’s response to the issues raised within the RR from West Hoathly Parish Council [[RR-4722](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.91.1 Applicant’s response to the matters raised by West Hoathly Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Traffic and Transport	<p>Gatwick Airport’s Northern Runway proposal will have a significant impact on surface transport in our community, West Hoathly Parish Council would like to raise the following points.</p> <ul style="list-style-type: none"> <li>• There will be a significant increase in traffic on the C319 through the villages of West Hoathly &amp; Sharpthorne</li> <li>• Unofficial bypass from East Sussex to Gatwick- - Wych Cross C2 East Sussex, - C319, -B2028, -A264, -M23 J10, -J9 Gatwick</li> <li>• The B2110 B2028 Crossroad in Turners Hill and the T-Junction at Wallage Lane B2028 are already severely congested.</li> <li>• GAL evaluations and studies only extend to the M23 and A23.</li> <li>• There has been no study of traffic movements east and</li> </ul>	<p>Strategic modelling has been undertaken for the region, as shown in Diagram 5.3.3 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>], and is not limited to the M23 and A23. The modelling work includes the villages of West Hoathly and Sharpthorne. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work, no significant increases in traffic are expected through West Hoathly and Sharpthorne.</p>

	<p>southeast of Gatwick and therefore there are no mitigations.</p> <ul style="list-style-type: none"> <li>• Failure to build an East Grinstead bypass.</li> <li>• There is still no eastern arm at the J9 M23 airport spur junction.</li> <li>• A22 between Imberhorne Lane and Felbridge is scheduled for 'improvements' as part of SPD SA20 550 homes Imberhorne Farm.</li> </ul>	
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### 3.92 Wisborough Green Parish Council

3.92.1 Table 3.92.1 below sets out the Applicant’s response to the issues raised within the RR from Wisborough Green Parish Council [[RR-4794](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.92.1 Applicant’s response to the matters raised by Wisborough Green Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration, Capacity and Operations, Traffic and Transport & Greenhouse Gases	Noise from increased arrivals - Concentration of flight paths - Noise from increased departures - Night flights - Overflight of areas not previously overflown - Lack of/restricted access to Gatwick Airport - Lack of infrastructure to support increased work force - Emissions - etc.	The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [ <a href="#">APP-039</a> ]. Increased aircraft noise is likely to lead to

		<p>significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p> <p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on the perception of tranquillity for receptors within AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>. The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be apparent.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project</p>
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		<p>would increase the numbers of fights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>Gatwick Airport is easily accessible by rail and the strategic highway network, and improvements are proposed to further improve walking and cycling access. Chapter 3 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a> provides an overview of access to the airport, and Section 2.2 sets out the surface access improvements</p> <p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum (without Project) scenario is not disputed.</p> <p>With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:</p>
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		<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. 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. 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 (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p> <p>With regards to the transportation of alternative fuels in a future scenario - it cannot be determined if this will indeed be the mechanism whereby supplies of energy for aircraft are brought for refuellingg/recharging (an in some scenarios - e.g. electric aircraft -</p>
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		deliveries will be through electricity networks). The existing fuel regime requires transportation of liquid aviation fuel by road, and any increase in this arising from changes in aviation profiles is not expected to be so different in scale from existing patterns as to represent a significant impact.
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### 3.93 Wizz Air

3.93.1 Table 3.93.1 below sets out the Applicant’s response to the issues raised within the RR from Wizz Air [[RR-4795](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.93.1 Applicant’s response to the matters raised by Wizz Air**

<b>Topic</b>	<b>Matter raised in the RRs</b>	<b>The Applicant’s response</b>
Capacity and Operations	London Gatwick is constrained in terms of capacity, therefore this scheme, if approved, would allow additional capacity to be released to the benefit of airlines and passengers.	Support is welcome and noted. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new and existing airlines to launch new destinations in new markets.

### 3.94 Worth Parish Council

3.94.1 Table 3.94.1 below sets out the Applicant’s response to the issues raised within the RR from Worth Parish Council [[RR-4796](#)], including signposting to the relevant sections of the DCO Application.

**Table 3.94.1 Applicant’s response to the matters raised by Worth Parish Council**

Topic	Matter raised in the RRs	The Applicant’s response
Noise and Vibration, Traffic and Transport, Health and Wellbeing, Air Quality & Greenhouse Gases	As a local authority, immediately below the current flight path, the Council is interested as to how a second runway will impact upon the lives of its residents and businesses, both in terms of possible detriment to personal amenity through increase in noise and pollution, and local transport issues, and in terms of possible benefits such as improvements to the local economy. The Council has not yet agreed its stance on the second runway proposals as it awaits all the documentation to be available.	<p>The Environmental Statement (ES) includes a robust assessment of impacts and results as identified under <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>], <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>], <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>], <b>Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>] and <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>].</p> <p>Strategic modelling has been undertaken as part of the Application, which include the villages of Copthorne and Crawley Down within Worth Parish Council. A summary of the modelling work is set out in Chapter 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The airport is well located to the strategic highway network and the majority of the increase in traffic is expected to be on the M23. Based on the modelling work, no significant increases in traffic are expected through Copthorne and Crawley Down.</p> <p><b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>] considers the public health implications of the Project. The assessment (section 18.8) has sections relating to noise, air quality, transport and socio-economic</p>

		<p>benefits. The assessment gives weight to the substantial measures to reduce noise exposures and alleviate traffic impacts, including through highway improvements. The assessment concludes that whilst there are a mix of beneficial and adverse population health effects, the adverse effects are not significant and the beneficial effects are significant, including linked to tailoring employment opportunities to local vulnerable groups. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
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		<p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Increased aircraft noise is likely to lead to significant noise effects at approximately 80 properties on Ifield Road and near Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East.</p>
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## 4 Relevant Representations – Thematic Responses

### 4.1 Overview

- 4.1.1 RRs that have been submitted by IPs with whom the Applicant does not have a SoCG have been responded by the Project team in either the SoCGs or the above tables. Each issue raised within the RRs has been assigned to a topic and those topics examined to identify themes. This is not intended to underestimate the importance of the matters raised but responding to the representations based on the themes raised hopefully provides an accessible and informative response to the representations raised whilst avoiding excessive repetition.
- 4.1.2 This report summarises the common issues along with the Applicant’s response. In some cases, it has been appropriate to respond to multiple issues with a single response.

### 4.2 Agricultural Land Use and Recreation

- 4.2.1 Table 4.2.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.2.1 Thematic issues and the Applicant’s response – Agricultural Land Use and Recreation**

Summary of issues raised in the RRs	The Applicant’s response
<b>Footpaths and Open Space</b>	
Uncertainty regarding the impacts of the NRP on public rights of ways. Concern that the NRP will remove large areas of woodland, footpaths and bridleways.	<p>The Public Rights of Way (PRoW) that are affected by the Project are set out paragraphs 19.9.17 to 19.9.38 of <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>].</p> <p><u>Effects of the Project on Bridleways</u></p> <p>Figure 19.6.4 of the <b>ES Agricultural Land Use and Recreation Figures</b> [<a href="#">APP-058</a>] identifies the location of the PRoW in relation to the Project and shows that no bridleways are directly affected by the Project.</p>

	<p><u>Permanent Impacts on Footpaths</u></p> <p>As shown on the <b>Rights of Way and Access Plans</b> [APP-018], two sections of footpath including a section of the Sussex Border Path to the north of Car Park Y (footpaths 346_2Sy and 367Sy) would be permanently stopped up and diverted in close proximity to their existing alignments to enable the highway improvement works to be completed. In addition, a section of footpath 346_2Sy east of North Terminal Roundabout would be stopped up where it forms part of the existing highway. This existing length of footway would be upgraded as part of the Project to a shared use route and would remain as part of the Sussex Border Path.</p> <p><u>Temporary Impacts on PRoW</u></p> <p>There would also be a need to temporarily stop up and divert a number of PRoWs, including parts of the Sussex Border Path and National Cycle Route (NCR) 21 during the highways construction period together with the implementation of other management measures, including the potential for managed crossings of PRoWs. These are identified in <b>ES Appendix 19.8.1 Public Rights of Way Management Strategy</b> [APP-215].</p>
<p>Concern over the impact of NRP on areas of open space including Riverside Garden Park.</p>	<p>The effects of the NRP on open space are set out in paragraphs 19.9.39 – 19.9.50 of <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [APP-044].</p> <p>The NRP’s highway improvement works would affect areas of open space at Riverside Garden Park and Church Meadows. These impacts have been reduced as far as possible within the development of the Project design and, where open space land is permanently required for the Project, replacement open space will be provided. This replacement open space will provide more</p>

quality open space than is currently available, and of a greater quantum than the existing open space to be lost by the Project. The location of the open space permanently affected and the replacement land proposed is identified on Figure 19.8.1 of **ES Agricultural Land Use and Recreation Figures** [\[APP-058\]](#).

#### Riverside Garden Park

There would be a permanent loss of approximately 1.01 hectares (ha) of land designated as open space along the southern boundary of Riverside Garden Park to facilitate works to the North Terminal roundabout and A23 highway improvements. This area of land comprises a long thin strip along the southern fringe of the park.

Approximately 0.67ha of this area comprises land that currently forms the highway embankment with toe ditch and does not form part of the area used as recreational space in the park. However, it is part of the designated urban open space in the Reigate and Banstead Borough Council policy map and therefore, whilst the land does not function as recreational open space, on a precautionary basis the area has been included in the calculation of open space permanently lost. The area of land affected within Riverside Garden Park, not including the highway embankment, comprises a smaller area of approximately 0.34ha.

In addition, a small area of 0.02ha of land would also be permanently affected to the north of the confluence of the River Mole and Gatwick Stream, located to the south of the A23 Brighton Road where the existing segregated left turn lane from the A23 Brighton Road southbound into the A23 London Road eastbound would be widened along with the associated structures supporting

this section of the highway and would incorporate a shared use path heading east from the roundabout.

This is a wooded area that is separated from the main area of Riverside Garden Park by the River Mole and cannot be accessed from the main area of Riverside Garden Park. This area can only be accessed by using a pedestrian gate located next to the A23 Brighton Road and negotiating a steep earth bank to reach an area of wooded land adjacent to the River Mole.

Replacement land for the loss of 1.03ha of open space in Riverside Garden Park and the small isolated area of open space to the north of the River Mole would comprise a greater area of approximately 1.43ha of open space within the existing areas of Car Park B (North and South).

The replacement open space would be located within close proximity to those areas of public open space that would be permanently lost and would therefore be accessible to the communities that they currently serve, including local residents as well as airport staff and visitors.

Accessibility to the replacement areas in Car Park B north would be provided through a new pedestrian connection from Riverside Garden Park into the north side of the replacement land. There would also be access into this area from the west from the current route of the Sussex Border Path.

Access into the replacement Car Park B south area would be available from the existing shared use pedestrian and NCR 21 route along the west side of the replacement land and also from the Sussex Border Path immediately to the east.



Specific landscaping principles and concept designs for the replacement open space have been developed as part of the wider **Outline Landscape and Ecological Management Plan** (oLEMP) [[APP-113,114,115,116](#)]. The application of these principles would be developed in the detailed LEMPs, in line with Requirement 8 of the **Draft DCO** [[PDLA-04](#)], to enable these spaces to be used in the same way and by the same communities as the areas of open space permanently lost.

Replacement open space areas at Car Park B North and South would comprise a similar mix of woodland areas and accessible grassland areas with a network of paths, as currently exist in Riverside Garden Park, together with the provision of seating areas.

Once the planting is fully established and matures over time as part of the agreed management plan, the areas of Car Park B North and South would provide larger areas of high quality, accessible open space than exists currently, providing enhanced access to the Sussex Border Path, compared to the loss of open space within Riverside Garden Park along a narrow strip of predominantly highways embankment planting.

#### Church Meadows

Church Meadows also forms part of the Riverside Green Chain and comprises mainly an open area of grassland bounded by the A23 to the south, the River Mole to the west and the boundary of St Bartholomew's Church to the north east. To enable the Longbridge Roundabout to have a slightly larger diameter and to accommodate wider circulating lanes, enhanced active travel infrastructure and improved exit lanes from and entry lanes to the roundabout.

The works to the roundabout would permanently impact an approximate area of 0.13ha on the southern part of the open space at Church Meadows, comprising an area of scrub and trees along the edge of the area of mainly grassed open space.

Replacement land for the permanent loss of 0.13ha in Church Meadows would comprise a much larger area of 0.52ha of land to the west of the River Mole.

A new footbridge would be constructed across the River Mole as part of the Project to link the existing area of Church Meadows to the area of the replacement open space and in addition, an access would also be provided to the replacement area at the south western corner from the shared use path close to Longbridge Roundabout. The replacement space would therefore be accessible to the communities that Church Meadows currently serves.

Specific landscape principles and concept designs have been developed as part of the wider **Outline Landscape and Ecological Management Plan (oLEMP)** [[APP-113,114,115,116](#)]. The concept design (Figure 1.2.3 of the oLEMP) incorporates the attenuation feature required as part of the surface access works adjacent to Longbridge Roundabout, together with a mixture of woodland, scrub and accessible grassland habitat with a network of mown paths.

Appropriate signage to the areas of replacement open space would be provided as part of the detailed LEMP for this area and it is also proposed that interpretation boards would be provided within the replacement area to the west

	<p>of the River Mole to explain the historical context to the adjacent conservation area.</p> <p>The implementation of the design principles in the oLEMP within the would ensure that high quality and usable replacement open space is provided and that public interest in landscape, nature conservation and the historic environment is enhanced, wherever possible, within the replacement open space.</p>
<p>Concern over the impact of NRP on the Sussex Border Path</p>	<p>The effects of the NRP on the Sussex Border Path are set out in paragraphs 19.9.18 to 19.9.38 of <b>ES Chapter 19: Agricultural Land Use and Recreation</b> <a href="#">[APP-044]</a>.</p> <p><u>Sussex Border Path</u></p> <p>The effects on the PRoW occur during the construction period of the Project and are mainly related to the construction of the highway improvement works. Two sections of footpath including a section of the Sussex Border Path to the north of Car Park Y (footpaths 346_2Sy and 367Sy) would be permanently stopped up and diverted in close proximity to their existing alignments to enable the highway improvement works to be completed.</p> <p><u>Permanent Impacts on the Sussex Border Path</u></p> <p>As shown on the <b>Rights of Way and Access Plans</b> <a href="#">[APP-018]</a>, two sections of footpath including a section of the Sussex Border Path to the north of Car Park Y (footpaths 346_2Sy) would be permanently stopped up and diverted in close proximity to their existing alignments to enable the highway improvement works to be completed. In addition, a section of footpath 346_2Sy east of North Terminal Roundabout would be stopped up where it forms part of the existing highway. This existing length of footway</p>

	<p>would be upgraded as part of the Project to a shared use route and would remain as part of the Sussex Border Path.</p> <p><u>Temporary Impacts on the Sussex Border Path</u></p> <p>There would also be a need to temporarily stop up and divert sections of the Sussex Border Path during the highways construction period together with the implementation of other management measures including potential for managed crossings of PRow and these are identified in the <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> [<a href="#">APP-215</a>].</p> <p>The construction of A23 Northbound third lane and A23 London Road bridge replacement would require the temporary closure and diversion of the section of 346_2Sy between the River Mole and North Terminal Roundabout. A temporary diversion route close to the existing route would be implemented to the west and south of Car Park Y to rejoin the Sussex Border Path at North Terminal Roundabout.</p> <p>The construction of the M23 Spur eastbound widening would require the temporary closure and diversion of Footpath 367 between Balcombe Road and junction with Footpath 368. A temporary diversion route has been identified that would be implemented via Balcombe Road, Haroldslea Drive, bridleway 372 and Footpath 381. The Sussex Border Path is a long-distance route and therefore many users walk considerable distances when using it. However, the diversion route would require users to walk an additional distance that would be in excess of 500m during the period of the diversion.</p>
<p>Interest in changes to active travel facilities</p>	<p>Section 5.2 of <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] summarises the active travel proposals for the Project. These proposals</p>

around Riverside and  
Cheyne Walk

are illustrated in Figure 12.6.2 as part of the **ES Traffic and Transport Figures** [[APP-037](#)], and **Surface Access Highways Plans - General Arrangements - For Approval** [[APP-020](#)].

The measures included in the final design proposals are expected to lead to a range of benefits for active travel users on key routes to and from the airport with improved connectivity and safety. The active travel infrastructure included in the proposed highway works would create an additional arterial route through Gatwick Airport together with National Cycle Route 21. These routes are expected to increase the attractiveness of active travel for the surrounding area.

Significant improvements for active travel users are proposed at Longbridge Roundabout with facilities becoming predominantly segregated including the introduction of a parallel toucan crossing and providing improved onward connectivity to Riverside Garden Park and North Terminal Roundabout.

The existing footway on the eastern side of A23 London Road to the south of the proposed shared use ramp is proposed to be widened. The newly proposed segregated route between Longbridge roundabout and North Terminal will provide a direct connection into the Airport for residents north of the Airport. It will be illuminated by street lighting and benefit from passive surveillance from the adjacent Car Park.

The section of active travel route from North Terminal to South Terminal would include signalised crossings and the route is proposed as shared use.

GAL is also exploring further improvements of NCR21 in the vicinity of South Terminal, to be

	<p>delivered at a later date (either as part of the Project or as a separate scheme).</p>
<p>Concern that Riverside Garden Park will be lost as a result of the NRP and there will be unfair adverse impacts on those who choose to travel to work using sustainable travel modes.</p>	<p>The effects of the NRP on open space and PRoW are set out in <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>].</p> <p>The NRP’s surface access works would affect areas of open space. These have been reduced as far as possible within the development of the Project design and replacement areas of land are included to provide additional areas of quality open space to those currently available.</p> <p>There would be a permanent loss of approximately 1.01 hectares of land designated as open space along the southern boundary of Riverside Garden Park to facilitate works to the North Terminal roundabout and A23 highway improvements. This area of land comprises a long thin strip along the southern fringe of the Park. Approximately 0.67ha of this area comprises land that currently forms the highway embankment with toe ditch and does not form part of the area used for recreational space in the Park. However, it is part of the designated urban open space in the Reigate and Banstead Borough Council policy map and therefore, whilst the land does not function as recreational open space, on a precautionary basis the area has been included in the calculation of open space permanently lost. The area of land affected within Riverside Garden Park, not including land within the highway boundaries, comprises a smaller area of approximately 0.34ha.</p> <p>Replacement open space for the permanent loss of the strip of land in Riverside Garden Park would be provided to the south-east in the existing areas of what is currently Car Park B (North and South). These areas would comprise approximately 1.43ha of replacement open</p>

	<p>space, approximately 0.42ha greater than the area of open space permanently lost.</p> <p>The concept design for these areas includes a new footpath link from Riverside Garden Park into the replacement open space, which would comprise a similar mix of woodland areas and accessible grassland areas as exist in Riverside Garden Park, together with the provision of seating areas to provide areas of a similar quality to the existing park and to provide equally usefully spaces and facilities. The development of this replacement open space offers the opportunity to provide new links from the existing promoted Sussex Border Path route that runs north/south adjacent to the western edge of the London to Brighton Railway to Riverside Garden Park through this area increasing accessibility to existing linkages. It would also improve the quality of the route of the Sussex Border Path through the removal of car park fencing in this area, creating the opportunity to incorporate the route into the detailed landscape proposals to be developed for the Car Park B areas.</p> <p>The active travel links through Riverside Garden Park are maintained as part of the NRP and additional links would be provided through the construction of a shared pedestrian and cyclist ramp between the footway on the northern side of the A23 near the Longbridge Roundabout into Riverside Garden Park, as well as the provision of an additional pedestrian route linking Riverside Garden Park to the replacement open space in Car Park B, linking with the Sussex Border Path to the north of the A23.</p>
<b>Agricultural Land</b>	
<p>Concern about impact on farms and the loss of agricultural land.</p>	<p>The impacts of the Northern Runway Project on agricultural land are assessed in <b>ES Chapter 19:</b></p>

**Agricultural Land Use and Recreation** [[APP-044](#)].

The areas of land holdings that would be affected are shown on Figures 19.6.3a and 19.6.3b in **ES Agricultural Land Use and Recreation Figures** [[APP-058](#)] and the permanent impacts on these holdings are described in paragraph 19.9.10 to 19.9.16 of **ES Chapter 19: Agricultural Land Use and Recreation** [[APP-044](#)].

The Project would lead to the loss of approximately 10.1ha of entirely lower quality Subgrade 3b land (graded pursuant to the Ministry of Agriculture Fisheries and Food Agricultural Land Classification System 1988). No high-quality agricultural land would be affected by the Northern Runway Project.

The permanent loss of land from these holdings would be due to the construction of the highway improvements and also the implementation of the ecological and landscape mitigation to the west of the River Mole, where an agreement has been reached between Gatwick Airport Ltd and the landowner to purchase part of the holding based at Brook Farm.

The implementation of the highway works would not compromise the overall operation of the farm holdings affected and measures would be implemented during the construction of the Project in accordance with the **Code of Construction Practice** [[APP-082](#)] to reduce, as far as possible, the effects of construction activities on farm holdings.

Where appropriate, these would include the maintenance of farm access locations; provision of appropriate fencing; maintenance of water supplies; co-ordination of timing of construction works to facilitate farming operations; and



	measures to address the potential risks of the spread of animal and plant diseases.
Agricultural land will be reduced to accommodate new areas of parking.	<p>The impact of the Northern Runway Project on Agricultural land is assessed in paragraphs 19.13.1 to 19.13.9 of <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>].</p> <p>The areas of car parking proposed are identified on Figure 5.2.1b of the <b>ES Project Description Figures</b> [<a href="#">AS-135</a>]. There would be no provision of car parking on agricultural land. The proposal to implement car parking on Pentagon Field was removed following consultation in September 2021 and no longer forms part of the Project.</p>

### 4.3 Air Quality

- 4.3.1 Table 4.3.1 below summarises the issues raised in the RRs and the Applicant's response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.3.1 Thematic issues and the Applicant's response – Air Quality**

<b>Summary of issues raised in the RRs</b>	<b>The Applicant's response</b>
Concern that quality will worsen as a result of NRP, increasing pollution from airport and road traffic sources.	<p><b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local authorities. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures included in the</p>

	<p>Project with the aim of reducing the airport's contribution to local air quality regardless of significance. This includes:</p> <ul style="list-style-type: none"> <li>• Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of <b>ES Appendix 13.8.1 Construction Period Mitigation [APP-161]</b> and are included in the <b>Code of Construction Practice [APP-082]</b> to be secured under the Requirements of the <b>Draft DCO [AS-127]</b>.</li> <li>• The <b>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</b> sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access are set out in <b>ES Appendix 5.4.1 Surface Access Commitments [APP-090]</b>.</li> <li>• The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) and the impacts from the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occurring as a result of airport activity.</li> </ul>
<p>Concern that quality will worsen as a result of NRP construction works, increasing pollution from road traffic sources.</p>	<p>The air quality effects of construction traffic have been assessed and is set out in <b>ES Chapter 13: Air Quality [APP-038]</b>. In addition, the effects from demolition and construction dust and emissions from the Project have been assessed using the qualitative approach described in the Institute of Air Quality Management (IAQM) dust guidance. <b>ES Chapter 13: Air Quality [APP-038] Appendix 13.4.1 Air Quality Assessment Methodology [APP-158]</b>. The assessment of construction has been based on the best estimate of emissions and conservative assumptions</p>

	<p>where applicable. No significant impacts are predicted to occur for the construction period.</p> <p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in <b>Section 5.8 of the ES Appendix 13.8.1 Period Mitigation [APP-161]</b> and are included in the <b>Code of Construction Practice [APP-082]</b> to be secured under the Requirements of the <b>Draft DCO [AS-127]</b>.</p> <p><b>Paragraph 2.2.7 of Appendix 5.3.2 Code of Construction Practice [APP-082]</b> (CoCP) sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP. The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing.</p>
<p>Concern of odour from engine fuel.</p>	<p><b>ES Chapter 13: Air Quality [APP-038]</b> has provided an assessment of odour impacts. The odour assessment concluded that the impact of the Proposed Development on odour is considered to be not significant. Odour risk would be managed following best practice handling procedures.</p>
<p>Concern of jettisoning of fuel.</p>	<p>Fuel jettisoning is only permitted in emergency situations and many aircraft do not have fuel jettisoning capability. The Civil Aviation Authority (CAA) guidance CAP 493 part 1 sets out the requirements and considerations should the need to jettison fuel arise. Guidance to reduce any impacts include avoiding routes over towns, jettisoning over 10,000ft above ground level to allow for evaporation and dispersion and preferably over water, clear of cities and towns. The CAA has noted it is 'not a very common occurrence' and that if it does occur it has to be reported as part of the Mandatory Occurrence Reporting (MOR) Scheme for aviation. Due to the</p>

	<p>infrequency of these events, it is considered that there is no potential significant effect from these activities.</p>
<p>Concern of increased risk to health and respiratory issues as a result of air pollution.</p>	<p>An assessment of health impacts been undertaken and is reported in <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a>. The assessment considers increased risk of cardiovascular and respiratory related conditions. The assessment concludes that the impact of air quality effects on health would be not significant.</p>
<p>Concern that new car parks are increasing air pollution as a result of NRP.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources including car parks, considering the change to emissions as a result of the Project's car park provisions. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p>
<p>Concern that pollutants will have an adverse effect on local ecological sites including SSSIs and the Surrey Hills AONB.</p>	<p>Pollutant concentrations were predicted at discrete sensitive ecological receptors within the wider study area which includes statutory designations such as Sites of Special Scientific Interest (SSSI) as well as non-statutory designations.</p> <p>The methodology for the assessment of significance at ecological receptors follows the IAQM guidance and Natural England documents and has been agreed with Natural England.</p> <p>For ecological sites, where changes are greater than 1% of the critical level, the assessment of effects has been considered in <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>. The assessment concludes that the impact of the</p>

	<p>Proposed Development on ecological receptors would not be significant.</p> <p>The air quality modelling has been carried out to enable a determination of whether the Project would cause likely significant effects on the integrity of European sites, as set out in <b>ES Appendix 9.9.1: Habitats Regulations Assessment Report</b> <a href="#">[APP-134]</a>. The assessment concludes no adverse effect on integrity of the relevant sites.</p>
<p>Concern around current poor air pollution in the local area, some residents claim that layers of black dust, soot and oil residue have been found locally.</p>	<p>An assessment of existing air quality levels is detailed in Section 13.7 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>. The baseline assessment has used the best available data including modelled and monitored air pollution data from Defra and local authorities. This data has been used to inform the assessment of effects in the future years when the Project would be operational.</p> <p>At the five continuous monitoring sites currently in operation within the air quality study area (11 km by 10 km domain) centred on Gatwick, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations have been consistently below the relevant long and short-term air quality standards in the latest available data from 2015 to 2021.</p>
<p>Concern that ultrafine particles emitted from vehicle engines and aircraft are causing health issues and have not been considered.</p>	<p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in Section 18.8 of <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a>. The approach follows IEMA 2022 guidance on assessing human health effects in EIA. 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. The health assessment has been</p>

	<p>scrutinised by the UK Health Security Agency and the Department of Health and Social Care Office for Health Improvement and Disparities and they agree with the conclusion that the Project should not result in any significant adverse impact on public health.</p>
<p>Concern that air quality will worsen in local villages as a result of traffic increases and traffic displacement.</p>	<p><b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-076]</a> provides full details of the assessment methodology and potential traffic and transport effects of the Project during construction and operation.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> considers changes in road traffic flows due to the Project on all roads within 11 by 10 km domain centred on Gatwick and on roads within the wider study area that are predicted to exceed the screening criteria due to the Project. Sensitive receptors within 200 m of the road network have been assessed to capture the impact of road traffic changes at representative worst-case (most sensitive) locations.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> indicated that there are no significant effects as a result of the Project and the Project is not predicted to impact compliance with the air quality standards.</p>
<p>Concern of increased air pollution as a result of idling and taxiing of aircraft.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment of aircraft includes emissions from the landing and take-off cycle on the ground including taxiing and up to a height of 3,000 ft. The assessment concludes that the impact of the Proposed Development would be not significant.</p>

<p>Concern that modelling of future years does not provide realistic results and should not be relied on.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils.</p> <p>The baseline year of 2018 was selected based on traffic and monitoring data availability and was discussed and agreed to be used with the local authorities. This provides a reference level against which any potential changes in air quality can be assessed. Paragraph 13.5.18 of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provides full details of the selected baseline year.</p> <p>Full details of the model verification process, to compare modelled predictions with real world results are included in Section 3 within the <b>ES Appendix 13.6.1</b> <a href="#">[APP-159]</a> The verification methodology was agreed with local councils at the modelling methodology workshop in November 2022.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> contains details of how the future baseline has been assessed and how predicted growth has influenced the future baseline.</p> <p>A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant.</p>
<p>Concern that the application lacks detail to assess the biomass boiler.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provided an assessment of the CARE facility based on the current outline design parameters in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a>.</p> <p>Notwithstanding this, the Applicant has put forward a change to the DCO Application to remove the boilers from the replacement CARE</p>

	<p>facility to become a waste sorting facility only (comprising 'Project Change 2'). The formal Change Request was submitted as part of Procedural Deadline A.</p>
<p>Concern that the assessment does not show compliance with WHO guidelines.</p>	<p>The World Health Organisation (WHO) global air quality guidelines are not currently part of UK legislation or policy, so the thresholds used to assess the Project have followed those in national legislation. Until such thresholds are changed, which may or may not reflect the WHO Guidelines, then assessment is undertaken in accordance with current legislation, which is consistent with policy standards. The methodology used to determine the significance of air quality impacts is detailed in <b>Section 13.5 of ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>].</p> <p>Notwithstanding this, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>
<p>Concern that current air quality monitoring is not sufficient and should be strengthened.</p>	<p>The assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] summarises the proposed operational phase air quality monitoring.</p> <p>Monitoring commitments are proposed to be secured under the draft Section 106 Agreement to be entered into in relation to the Project.</p> <p>The draft 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 Airport will add an additional Defra reference equivalent monitor and additional indicative MCERT continuous monitors. Therefore, there is no change in the monitoring</p>



	<p>as currently carried out and additional monitoring will be added.</p> <p><b>ES Air Quality Figure 13.1.12</b> <a href="#">[APP-066]</a> outlines draft locations of the proposed monitoring stations.</p>
<p>Requests for information concerning any mitigation measures designed to address construction dust and manage construction vehicles.</p>	<p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in <b>Section 5.8 of the ES Appendix Construction Period Mitigation</b> <a href="#">[APP-161]</a>. The <b>Code of Construction Practice</b> <a href="#">[APP-082]</a> secured under the Requirement 7 of the <b>draft DCO</b> <a href="#">[AS-127]</a>. sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP. The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing.</p> <p>The Project is also supported by an <b>Outline Construction Traffic Management Plan (oCTMP)</b> <a href="#">[APP-085]</a>, the purpose of which is to set out measures to manage construction traffic during the construction of the Project. Section 6.7 of the <b>oCTMP</b> sets out how the construction traffic will be managed taking account of the surface access improvement works. The final CTMP is secured under Requirement 12 of the <b>draft DCO</b> <a href="#">[AS-127]</a>, for approval by the relevant planning authority and to be substantially in accordance with the oCTMP.</p>
<p>Concerns that there is not appropriate mitigation in place regarding impact on human and ecological health.</p>	<p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the</p>

	<p>Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in <b>Section 5.8 of the ES Appendix 13.8.1 Construction Period Mitigation</b> [<a href="#">APP-161</a>] and are included in the <b>Code of Construction Practice</b> [<a href="#">APP-082</a>], to be secured under the requirements of the DCO.</p> <p>The <b>ES Appendix 5.4.2 Carbon Action Plan</b> [<a href="#">APP-091</a>] sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access are set out in <b>ES Appendix 5.4.1 Surface Access Commitments</b> [<a href="#">APP-090</a>].</p> <p>Measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities to carry out their LAQM requirements.</p>
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#### 4.4 Alternatives

4.4.1 Table 4.4.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.4.1 Thematic issues and the Applicant’s response – Alternatives**

Summary of issues raised in the RRs	The Applicant’s response
<p>Gatwick Airport is the incorrect location for increased airport capacity due to the lack of east-west road and rail connections.</p>	<p>Detail of the need for the Project at this location is discussed in Sections 1 and 6 of the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6).</p> <p>Gatwick Airport has the world’s busiest (daytime) single runway. The Airports Commission recognised that there will be a shortage of airport capacity in the South-East – a shortage so severe that it poses risks to the UK economy and to the UK’s hub status.</p> <p>In 2019 demand for travel to/from Greater London itself accounted for 77m passengers, or just under half of the London airports’ demand. The South East of England is the second largest contributor to aviation demand generating a further 40m passengers in 2019. The London airports also attract demand from across the UK with regions such as the South Cost and Midlands also contributing significant passenger volumes.</p> <p>London Gatwick is located in the heart of the most prosperous, densely populated and best-connected region of the UK with more than 17m people within 90 minutes of Gatwick. It has a significant passenger catchment area which produces more than 40m passenger journeys a year.</p> <p>The airport also benefits from a significant share of the inner London catchment thanks to its excellent rail access into Central London. Unlike other London airports, there are fast and convenient connections every 3 minutes, arriving into London Victoria and London Bridge in under 28 minutes. In addition to the excellent connections into central London, Gatwick also</p>

	<p>offers connections down to Brighton and to Cambridge and Leeds, among others.</p>
<p>Additional airport capacity should be considered at locations further away from urban areas with high population densities. Some respondents indicated a preference for a new airport along the coast rather than expansion at Gatwick Airport to enable aircraft flight paths over the sea rather than populated areas.</p>	<p>The Government’s policy (Flightpath to the Future) directly encourages “better use” of <b>existing</b> airport infrastructure and the Government’s own forecasts of aviation capacity that can be achieved by making better use includes the Northern Runway Project at Gatwick.</p>
<p>Suggestion that additional air traffic should be direct to airports in the north of England where there is spare capacity rather than expand Gatwick Airport. Some respondents indicated a preference for Doncaster Airport to remain open as this would assist with levelling-up ambitions.</p>	<p>The strong aviation market being served by the London airports reflects the concentration of population, relative wealth, strong trade links, diverse population and strong inbound tourism demand, amongst other factors. GAL forecasts that London will continue to account for the majority of UK aviation demand. The outlook for population, GDP and inbound tourism continue to favour London and the South East. Whilst some redistribution between airports may be anticipated it will not detract from the importance of demand at the London airports.</p> <p>Recent forecasts by the DfT show continuing capacity at Manchester and at Birmingham (~100k today); but both these airports are operating well below their capacity limits.</p> <p>Owing to their geographical location and the smaller route networks of the non-London airports (compared with Heathrow and Gatwick), they are inherently less attractive, and it is unrealistic to expect demand to readily re-deploy from the South East to more northerly airports. HS2 is unlikely to change the position significantly. Its</p>

	<p>principal effect, if any, will be to increase the accessibility of the South East airports to the population in the rest of the country.</p>
<p>View that there is sufficient capacity at other London airports and the NRP is not needed. Preference for expansion at other London airports, including Heathrow, Luton, Stansted and Southend. Some respondents indicated a preference for make greater use of regional airports.</p>	<p>GAL forecasts that London will continue to account for the majority of UK aviation demand. The outlook for population, GDP and inbound tourism continue to favour London and the South East. Whilst some redistribution between airports may be anticipated it will not detract from the importance of demand at the London airports.</p> <p>London benefits from six airports serving the largest aviation market in the world, however most of its major airports are already capacity constrained.</p> <p><u>Capacity Today:</u></p> <ul style="list-style-type: none"> <li>- <b>Heathrow</b> benefits from two runways but has been operating at its planning limit of 480k annual aircraft movements for over 10 years.</li> <li>- <b>Gatwick</b> has been constrained for several years with no runway capacity available during the core hours of the day in the peak summer months.</li> <li>- <b>Luton</b> reached its planning limit of 18 million passengers in 2019. A modest increase to 19 million passengers has recently been permitted.</li> <li>- <b>Stansted</b> recently had its planning limit raised from 35 to 43 million passengers. It is also relatively distant from the central London and Southeast aviation market.</li> <li>- <b>London City</b> served just 5 million passengers in 2019 equivalent to &lt;3% of the London aviation market. It serves a small subset of demand focused on regional jets flying business-oriented routes during weekdays.</li> </ul>

	<ul style="list-style-type: none"> <li>- <b>Southend</b> served just 2 million passengers in 2019.</li> </ul> <p>Recent forecasts by the DfT show continuing capacity at Manchester and at Birmingham (~100k today); but both these airports are operating well below their capacity limits.</p> <p>Owing to their geographical location and the smaller route networks of the non-London airports (compared with Heathrow and Gatwick), they are inherently less attractive, and it is unrealistic to expect demand to readily re-deploy from the South East to more northerly airports. HS2 is unlikely to change the position significantly. Its principal effect, if any, will be to increase the accessibility of the South East airports to the population in the rest of the country.</p>
<p>Expansion should occur at Heathrow Airport over Gatwick Airport as it is better suited for expansion.</p>	<p>Gatwick’s case is that the airport needs more capacity for operational purposes (see Section 7 of the <b>Needs Case</b> <a href="#">[APP-250]</a>) and that the forecast need for growth is strong, whether or not a third runway is built at Heathrow.</p> <p>It would not be appropriate to assume that a third runway will be promoted, consented, funded and built at Heathrow. Each of those steps remains uncertain. This issue was addressed in the Secretary of State’s decision in 2022 at Manston Airport where some objectors argued that there was no need, because it would be met at Heathrow or through other airport expansion. The <b>Planning Statement</b> <a href="#">[APP-245]</a> explains from paragraph 8.2.16 that the Secretary of State concluded at Manston as follows:</p> <p><i>97. .... However, the Secretary of State is of the view that in considering whether there is a demand for the capacity the Development aims to provide, he is not able to attach weight to</i></p>

	<p><i>applications that have yet to come forward. This is because there is no certainty that capacity from such applications will be delivered. For example, aspiration plans setting out future growth may be modified or changed, or they may not come forward at all. Where planning permission is required, both the ANPS and the MBU policies are clear that they do not prejudice the decision of the relevant planning authority responsible for decision-making on any planning applications. Such applications are subject to the relevant planning process and may not ultimately be granted consent by the decision-maker. In addition, the aviation sector in the UK is largely privatised and operates in a competitive international market, and the decision to invest in airport expansion is therefore a commercial decision to be taken by the airport operator.”</i></p>
<p>Investment should be focused on rail improvements and local improvements rather than air travel.</p>	<p>No taxpayer money would be used to finance the Project.</p> <p>A comprehensive assessment has been undertaken for rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of <b>Transport Assessment</b> <a href="#">[AS-079]</a>. It also informs the assessment in <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a>.</p>
<p>Climate-friendly travel options should be encouraged rather than options that increase air travel.</p>	
<p>New flight paths are proposed without sufficient consideration of making the best use of existing flight paths.</p>	<p>The Northern Runway Project does not require airspace change to operate (see CAA airspace change proposal ACP-2019-81) as set out within Paragraph 8.6.4 of the <b>Planning Statement</b> <a href="#">[APP-245]</a></p> <p>London Gatwick’s current airspace design includes defined (and approved by the Civil Aviation Authority) Standard Instrument Departure routes and arrival procedures for both</p>

	<p>the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p>
<p>Alternatives have generally not been considered.</p>	<p>The Applicant regularly reviews its long term plans for airport growth and development. As part of the 2019 Master Plan, the Applicant considered three scenarios in response to increased demand. The three scenarios and the rationale for selecting the option taken forward as part of the Project is described in Section 3.4 of <b>ES Chapter 3: Alternatives Considered</b> [<a href="#">APP-028</a>].</p> <p>An alternatives assessment process was undertaken to establish the Project components and their locations from the outset, based on a comprehensive set of assessment criteria which underpins the scheme layout. The approach to considering and assessing alternatives has then been maintained through the scheme’s development and pre-application consultation stages. These are described along with the process undertaken to select the most appropriate design options to take forward in Section 3.5 of <b>ES Chapter 3: Alternatives Considered</b> [<a href="#">APP-028</a>].</p>

## 4.5 Capacity and Operations

4.5.1 Table 4.5.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.5.1 Thematic issues and the Applicant’s response – Capacity and Operations**

Summary of issues raised in the RRs	The Applicant’s response
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<p>Operational changes at the airport have not brought benefits.</p>	<p>It is not clear which operational changes are being referred to here but the <b>Capacity and Operations Summary Paper</b> (Doc Ref 10.7) demonstrates a progressive enhancement in the capacity of the airport.</p>
<p>Gatwick cannot achieve the capacity it claims in the future baseline or the NRP scenarios – because of capacity constraints on the ground and in the air.</p>	<p>The modelling undertaken has provided a robust assessment of the level of increase in capacity afforded by the dual runway concept of operation.</p> <p>NATS delivers a London Approach Service that is capable of meeting on a continuing basis any reasonable level of overall demand for such services. NATS has measures in place to manage the flow of traffic in the London Terminal Manoeuvring Area (LTMA) efficiently and to ensure the sector/airspace loading remains within safe operational parameters.</p> <p>The Applicant has the <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) which addresses these issues.</p>
<p>The airport is subject to a record of delays and poor performance. It cannot manage its existing capacity and expansion would make this worse.</p>	<p>London Gatwick is proud to operate the world's most efficient single runway airport and the airport consistently achieves Service Quality Rates close to 100%. Despite the challenges that arise from a lack of capacity and which impact on-time performance (OTP), GAL has maintained an overall high level of service and reliability for customers. The demand for slots at London Gatwick remains high, a testament to the airport's strategic importance and ongoing performance.</p> <p>To address current constraints and enhance performance, London Gatwick has implemented an air traffic management and airfield infrastructure optimisation program. This includes initiatives such as Reduced Departure Separation, Time-Based Separation on arrival, and the construction of a new optimally sited</p>

Rapid Exit Taxiway (RET) to improve resilience. Collaboration with airlines and business partners is also ongoing to further enhance operational efficiency.

The plan to bring the existing northern runway into routine use is a crucial component of plans to further improve the operational performance. If approved, the plans would decongest the existing single runway operation, significantly improving the airport's capacity and resilience. By doing so, GAL anticipates a reduction in airport-induced delays, contributing to an overall improvement in operational performance.

It's important to note that delays experienced by airline customers are often influenced by factors beyond the airport's control. High-traffic demand across the network, coupled with events and limitations unrelated to the airport, can impact schedules. Notably, airspace constraints across Europe, exacerbated by issues such as the war in Ukraine, contribute to bottlenecks affecting Gatwick airlines serving destinations in southern Europe.

Eurocontrol and its Network Manager, responsible for air traffic management across Europe, have been actively addressing these network deficiencies. Their rolling program of initiatives aims to resolve or mitigate design constraints, ultimately improving the efficiency of the airspace and reducing delays.

Constraints in the London Terminal Manoeuvring Area airspace are also a factor, the outdated design and sectorisation of which causes periodic air traffic flow problems today. While the Northern Runway Project will not rely upon the deployment of airspace modernisation (the Future Airspace Strategy Implementation - South) this project will deliver airspace benefits that will directly address

	<p>constraints in today’s airspace. The use of Performance Based Navigation to design the network of airways in such a way that will increase the number of routes while reducing interactions and pinch points will further enable airport capability and resilience.</p> <p>In conclusion, London Gatwick is dedicated to continuous improvement and the proposed plans coupled with ongoing operational enhancements and collaboration efforts, positions the airport to meet the increasing demand for air travel while addressing concerns related to delays.</p>
<p>It is not clear how expansion would enable greater connectivity.</p>	<p>The section on Dual Runway Operations in the <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7)) sets out how the proposal will generate increased airport capacity. The consequences of the current capacity constraints across the London airports are recognised as damaging to the UK through a lack of opportunity for global connectivity. Gatwick already has the most extensive network of the London airports, the new capacity offered by the Northern Runway Project will enable new airlines entrants to reinforce existing routes and to launch new destinations in new markets.</p>
<p>Airspace changes around the airport have been unacceptable and / or illegal.</p>	<p>The airspace structures currently in place that service London Gatwick are legally constituted and comply with relevant international and UK aviation safety standards. Changes to airspace follow a regulated process (CAP 1616), the environmental aspects of which are set out in a statutory set of rules known as the altitude based priorities (described in the Air Navigation Guidance 2017).</p> <p>The Northern Runway Project does not require airspace change to operate (see CAA airspace change proposal ACP-2019-81). London Gatwick’s current airspace design includes</p>

	<p>defined (and approved by the Civil Aviation Authority) Standard Instrument Departure routes and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p>
<p>Two runway operation has not been shown to be achievable or safe – and safety issues arise from the loss of the emergency runway.</p>	<p>The nature of the proposed two runway operation is not a novel concept, it operates successfully elsewhere.</p> <p>Safety in the London Gatwick aviation operation is the primary consideration. The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Dual Runway Operation section explains in more detail the concept of operation for the dual runway, how this will decongest the main runway and includes examples of where this type of system is already safely operated today.</p> <p>The CAA is the decision-making authority in relation to safety and regulates all UK airports to ensure they comply with relevant international and UK aviation safety standards. London Gatwick has been working closely with the CAA over the new airfield infrastructure and the concept of operations. The CAA Statement of Common Ground (Doc Ref. 10.1.11) confirms the CAA’s agreement with the principles of the proposals from a safety perspective. Certification under the CAA satisfies UK aviation operational and safety requirements.</p>
<p>There may not be sufficient airspace capacity and the project is dependent on FASI south.</p>	<p>NATS delivers a London Approach Service (air traffic control) that is capable of meeting, on a continuing basis, any reasonable level of overall demand for such services. NATS has measures in place to manage the flow of air traffic in the London Terminal Manoeuvring Area (LTMA)</p>

	<p>efficiently and to ensure the sector/airspace loading remains within safe operational parameters.</p> <p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81).</p> <p>London Gatwick’s current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways. The UK airspace modernisation programme is not a dependency. However, airspace modernisation is compatible with the Northern Runway Project and will directly benefit London Gatwick in terms of capacity, efficiency, resilience and in reducing environmental impacts.</p> <p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p>
<p>Support for increased airspace capacity at Gatwick Airport.</p>	<p>Noted. The Applicant welcomes the support for increased airspace capacity.</p>
<p>There are multiple issues with the planning and operation of airspace around the airport, including low flying aircraft, the use of PRNAV, inappropriate locations for SIDs or stacking.</p> <p>NRP will cause the increased use of WIZAD.</p>	<p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81). London Gatwick’s current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The <b>Capacity and Operations Summary Paper</b> (Doc Ref. 10.7) under the Airspace section explains in more detail the procedures for arriving and departing aircraft at London Gatwick.</p>

	<p>The WIZAD Standard Instrument Departure route will be operated as per the current published protocols set out in the published SID (see the UK Aeronautical Information Publication AD 2 EGKK 2.21 and EGKK-6-13) meaning that WIZAD may be offered tactically by air traffic control ‘to alleviate airspace congestion or to avoid adverse weather, in particular thunderstorms.</p> <p>The UK airspace modernisation programme is not a dependency. However, airspace modernisation is compatible with the Northern Runway Project and will directly benefit London Gatwick in terms of capacity, efficiency, resilience and in reducing environmental impacts. It is this programme, not the Northern runway project, under a separate regulated (airspace change) process that will consider the redesign of the London airspace.</p>
<p>The NRP will adversely affect General Aviation.</p>	<p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81). The current arrangements for airspace access for General Aviation remain extant and it is not considered that any adverse impact on GA will result as a result of the NRP.</p>

## 4.6 Climate Change

- 4.6.1 This section contains matters relating to Climate Change Resilience (CCR) and In-Combination Climate Change Impacts (ICCI). Where a respondent has referred to ‘climate change’ but not in the context of CCR or ICCI, the issue will be responded to within the Greenhouse Gases section further below.
- 4.6.2 Table 4.6.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.6.1 Thematic issues and the Applicant’s response – Climate Change**

Summary of issues raised in the RRs	The Applicant’s response
<p>Concern that the NRP will accelerate global warming which has consequences. Many respondents raised concerns that they are already experiencing human health impacts as well as displacement resulting from global warming.</p>	<p>Human health impacts from a changing climate (not including displacement) including noise, extreme temperatures and drought, flooding impact on mental health, mould and spore are assessed in-combination with the Project and as part of <b>ES Appendix 15.9.1: In-combination Climate Change Impacts Assessment</b> [<a href="#">APP-188</a>] and are deemed not significant due to embedded mitigation.</p> <p>Vulnerable population groups have been accounted for in the assessments that reached the above conclusions, the professional judgment being that the population health effects would be not significant.</p> <p>The concern that the NRP will result in an increase in emissions and risk achieving the UK’s carbon budgets or Net Zero Target is addressed in the following section on Greenhouse Gases.</p>
<p>Concern regarding the contribution of additional flights towards climate change, including extreme weather events.</p>	<p>For the construction period, 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 are summarised in Table 15.8.5: CCR Assessment for the Construction Period in <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and considered in more detail as part of the Climate Change Resilience assessment in Table 2.1.1: Climate Change Resilience Assessment of <b>ES Appendix 15.8.1: Climate Change Resilience Assessment</b> [<a href="#">APP-187</a>].</p> <p>For the operational period, extreme events exacerbated by climate change are included in the assessment and summarised in the Table 15.8.6: CCR (risk based) Assessment for the</p>

Summary of issues raised in the RRs	The Applicant's response
	<p>Operational Period, <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> and considered in more detail as part of the Climate Change Resilience assessment in Table 2.1.1: Climate Change Resilience Assessment of <b>ES Appendix 15.8.1: Climate Change Resilience Assessment</b> <a href="#">[APP-187]</a>.</p> <p>Information regarding occurrence of extreme weather events, including hot days, frost days, heavy rainfall and dry spells is given in <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a>. The current baseline/climate is shown in Tables 15.5.2 and 15.5.3 and given for the future baseline for two time horizons in Tables 15.5.5: UKCP18 Climate Change Projections for Meteorological Changes for the Gatwick Area for the 2030s, Table 15.5.6: UKCP18 Climate Change Projections for Meteorological Changes for the Gatwick Area for the 2060s and Table 15.5.8: UKCP18 Projections for Future Extreme Weather Events for the Gatwick Area for the 2060s.</p> <p>The increase in emissions from a range of sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the future baseline scenario (in the absence of the Proposed Development) is not disputed.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the</p>



Summary of issues raised in the RRs	The Applicant's response
	<p>Project, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The assessment specifically includes the emissions arising from increases in aviation as set out in Table 16.4.1 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>View that the NRP will be a contributor to climate change induced flooding, which is becoming more frequent and severe around the airport.</p>	<p>Climate change will exacerbate both types of flooding relevant to Gatwick Airport (river/fluvial, surface water/pluvial), irrespective of the Project. The average number of days of heavy rain (the Met Office definition when precipitation is greater than 25 mm per day) is increasing for both the construction period for the 2030s (2020-2049) and the 2060s (2050-2079) (see Tables 15.5.5 and 15.5.6 in <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a>).</p> <p>Gatwick Airport is currently at risk of flooding from local watercourses such as the River Mole and Gatwick Stream as reported in Section 5 of <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[AS-078]</a>. However, through provision of the mitigation measures listed in Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> the NRP will not increase existing levels of fluvial (river) or surface water drainage flood risk for its lifetime including the predicted impact of climate change.</p> <p>The Project is not expected to increase future flood risk given the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-147]</a> which takes into account relevant climate change allowances as agreed with the Environment Agency, and the embedded mitigation (as set out in Table 11.8.1</p>

Summary of issues raised in the RRs	The Applicant's response
	<p>of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>], Tables 15.8.4 and 15.9.1 of <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and also summarised specifically for Climate Change in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [<a href="#">APP-078</a>):The Project is not expected to increase future flood risk given the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>] which takes into account relevant climate change allowances as agreed with the Environment Agency, and the embedded mitigation (as set out in Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>], Tables 15.8.4 and 15.9.1 of <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and also summarised specifically for Climate Change in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [<a href="#">APP-078</a>):</p> <ul style="list-style-type: none"> <li>• CC-1 Construction management measures – to avoid high flood risk zones, temporary flood protection/floodwater diversion</li> <li>• CC-2 Adverse weather measures in construction – including flood measures</li> <li>• CC-5 Realignment of the River Mole – improve flow and capacity of the river</li> <li>• CC-6 Flood compensation areas – two new areas</li> <li>• CC-7 Additional surface water attenuation – water storage in drainage network</li> <li>• CC-8 Additional water infrastructure – airfield syphons, noise bund syphons, new water treatment works, new pumping station.</li> <li>• CC9-Highway drainage design - limiting discharges to watercourses.</li> <li>• C-14 Adverse weather plans in operation – during flood events.</li> </ul> <p>The multiple potential risks from river and surface water flooding, collectively with the Project, are deemed not significant.</p>

Summary of issues raised in the RRs	The Applicant's response
	<p>The fluvial and surface water drainage mitigation strategies address the loss of floodplain and increased impermeable area that would result from the Project respectively. This would ensure that there would be no increase in flood risk to other parties for the during of the development, taking the predicted impacts of climate change into account. This is in accordance with the current Environmental Agency guidance (EA, 2022)<sup>4</sup> which is based on the United Kingdom Climate Change Predictions 2018 (Met Office, 2018). Further detail on this is contained in:</p> <ul style="list-style-type: none"> <li>• <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>]</li> <li>• Surface Access Highways Surface Water Drainage Strategy Summary in <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>]</li> </ul>
<p>Request for additional reporting on the climate impacts of the NRP once operational, including publication of the report on the Gatwick website.</p>	<p>As a responsible operator, and in compliance with the legislative requirements (existing and forthcoming), GAL has procedures to check the efficacy of the embedded mitigation measures assumed in <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and keep them under review on account of regulator change, other circumstances change or the prevailing climate changes; to preserve passenger and operational safety and business continuity.</p> <p>All risks, especially the medium risks (not significant) to ensure they do not move to the high or very high rating, need regular review. See</p>

<sup>4</sup> Environment Agency (2022) Flood risk assessments: climate change allowances [Online]. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Summary of issues raised in the RRs	The Applicant's response
	<p>Section 15.8.17 of <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>] and <b>ES Appendix 15.8.1 Climate Change Resilience Assessment</b> [<a href="#">APP-187</a>] for more detail.</p> <p>All In-Combination Climate Change Impacts (ICCI) currently identified as not significant need future monitoring by GAL. See Section 15.12.10 of <b>ES Chapter 15: Climate Change</b> [<a href="#">APP-040</a>], and <b>ES Appendix 15.9.1: In-combination Climate Change Impacts Assessment</b> [<a href="#">APP-188</a>] for more detail.</p> <p>During operation this can be formalised and aligned with GAL's Taskforce on Climate-related Financial Disclosures mandatory reporting (latest example online in GAL, 2023<sup>5</sup>) and GAL's 5-year review cycle for the <i>Climate Adaptation Risk Assessment</i> (GAL, 2021)<sup>6</sup>, reporting to the Government under the Adaptation Reporting Power (ARP) as part of the 2008 Climate Change Act. Although currently voluntary, all major airport and infrastructure operators currently report under the ARP and this reporting may become mandatory in the future.</p>

#### 4.7 Compulsory Acquisition and Compensation

4.7.1 Table 4.7.1 below summarises the issues raised in the RRs and the Applicant's response to those issues, including locations within the Application Documents where further information can be found.

<sup>5</sup> Gatwick Airport Limited (Gatwick) (2023) Annual report and the consolidated and parent company financial statements for the year ended 31 December 2022 [Online]. Available at: <https://www.gatwickairport.com/globalassets/company/investor/2022/ivy-holdco-limited-consolidated-financial-statements-31-december-2022.pdf>

<sup>6</sup> Gatwick Airport Limited (Gatwick) (2021) Climate Change Adaptation Progress Report.

**Table 4.7.1 Thematic issues and the Applicant’s response – Compulsory Acquisition and Compensation**

Summary of issues raised in the RRs	The Applicant’s response
<p>Comments from those with a property interest raising concerns and questions that are specific to their interest and situation.</p>	<p>The Applicant has carefully considered the concerns and issues raised in RR’s that have been submitted by those identified as having an interest in the land required for the Project. Issues raised relating to the amount and type of land required by the Applicant for the Project can be found within the <b>Statement of Reasons</b> [AS-008] as well as the <b>Land Plans</b> [AS-016] within the DCO. The SoR and Land Plans show the areas the Applicant is applying for powers of permanent acquisition, acquisition of rights, and temporary possession over to enable the Project. The powers sought have been included to enable the expansion and improvement of the strategic road network which aims to improve traffic movements.</p>
<p>Comments expressing concern that those whose land interests would be directly affected by the Project would not be sufficiently compensated.</p>	<p>The Applicant is aware of Category 3 Land Interests that have made Relevant Representations and their concerns as to how, and when compensation will be assessed. Any interest identified as an interested party will have the opportunity to make a claim for any losses in accordance with the Compensation Code. Any claim of compensation should be made to the Applicant and it will be assessed in accordance with the Compensation Code.</p>
<p>Comments from those with an interest in land raise concerns and questions that are specific to their compensable interest. Specifically, respondents also referenced FASI-S as a contributing factor to decreased property values.</p>	<p>Under the Planning Act 2008 the Applicant is required to consult those who have a land interest who might be entitled to claim compensation. Under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973, or section 152(3) of the Planning Act 2008 as a result of the delivery of the Project. These parties are listed in the <b>Book of Reference</b> [AS-012]. If exercised, the powers that GAL is seeking may result in an interference with property rights</p>

	<p>and private interests in land. The <b>Draft DCO</b> <a href="#">[AS-127]</a> provides that where these powers are exercised, the owner of the affected land may be entitled to compensation under the Compensation Code (Ref 1.10). Any dispute in respect of the compensation payable would be referred to and determined by the Lands Chamber of the Upper Tribunal. Furthermore, parties not initially included in the <b>Book of Reference</b> <a href="#">[AS-012]</a>, but who later ascertain they are eligible to claim, will not be barred from doing so.</p>
<p>Comments expressing concern that those parties in the Category 3 boundary will be subject to compulsory land acquisition.</p>	<p>The Applicant is aware that some of the Relevant Representations have been made by parties who have an interest outside of the Category 1 &amp; 2 boundary. These interests will not be subject to Compulsory Acquisition Powers within this DCO, these powers are outlined within the <b>Statement of Reasons</b> <a href="#">[AS-008]</a>. The Applicant has taken a proportionate approach to the Application for compulsory acquisition powers in the <b>Draft DCO</b> <a href="#">[AS-127]</a>, and it is not the intention to acquire more land than is required for the Project. However, the Applicant has proposed that any land acquired for the Project that is later identified as surplus to the needs of the Project will be returned to the landowner, reflecting the Crichel Down principles that apply with respect to land acquired compulsorily.</p>
<p>Comments from Interested Parties expressing concern that land subject to Compulsory Acquisition Powers is shown as Permanent Acquisition where land may only be needed for Temporary use with permanent rights.</p>	<p>The Applicant has categorised the land acquisition proportionately to ensure that the Applicant has the ability to acquire the land required to design, construct, and operate the Project (subject to detailed design) and where required to relocate and divert the assets of Statutory Undertakers. Only land confirmed as being required permanently (subject to detailed design) is to be acquired by the Applicant. The land occupied temporarily will be reinstated and returned to the landowner (see the <b>Draft DCO</b></p>

	<p><a href="#">[AS-127]</a>). Details of these relevant powers can be found in Section 5.2 of the <b>Statement of Reasons</b> <a href="#">[AS-008]</a>.</p>
<p>Comments from Interested Parties in support of the project, provided it does not increase the footprint of the current airport.</p>	<p>The Applicant is aware of concerns raised by Interested Parties relating to the project increasing the footprint of the airport.</p> <p>There are different definitions that can be used in defining the airport boundaries, which are explained and shown in the Project <b>Glossary</b> <a href="#">[APP-004APP-004]</a>.</p> <p>The ‘airside’ boundary will require changes to reflect the NRP proposals, namely to incorporate the airfield works and airfield support facilities that would extend outside the existing airside boundary (e.g. the End Around Taxiway West and the new Pier 7). These elements are required to be within the security fencing which defines the ‘airside’ boundary.</p> <p>The ‘landside’ area would also extend to capture the NRP proposals to include the proposed mitigation areas, such as Museum Field and Pentagon Field ecological area.</p>
<p>Interested Parties have expressed concern relating to the proposed land acquisition associated with The Applicant’s development and its impacts on the proposed Horley Strategic Business Park. Concern was also raised as to how the implementation of both schemes in parallel has been considered.</p>	<p>The Applicant is engaging with the parties who hold land interests associated with the potential Horley Business Park development and will be seeking a negotiated settlement to negate the use of the compulsory acquisition and temporary possession powers sought in the <b>Draft DCO</b> <a href="#">[AS-127]</a>.</p>

## 4.8 Construction

4.8.1 Table 4.8.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.8.1 Thematic issues and the Applicant’s response – Construction**

Summary of issues raised in the RRs	The Applicant’s response
Construction Schedule details requested	<p>The timing of the commencement of construction of the Project would be dependent on the timing of securing development consent and other relevant consents and licences and the discharge of the associated requirements. The assumptions which inform the indicative construction programme enable a representative assessment of the likely significant effects but are not fixed dates within a prescribed programme or sequence.</p> <p>For information on the activities anticipated to be undertaken please refer to Sections 5.3.4 to 5.3.80 of <b>ES Chapter 5: Project Description</b> [<a href="#">APP-030</a>] and <b>ES Appendix 5.3.3: Indicative Construction Sequencing</b> [<a href="#">APP-088</a>].</p>
Construction disruption concerns (construction traffic, surface access, highways, air quality, noise, biodiversity)	<p>As stated in the <b>ES Appendix 5.3.2: Code of Construction Practice</b> [<a href="#">APP-082</a>], the Project will be constructed in an environmentally sensitive manner and will meet the requirements of relevant legislation, codes of practice and standards. The construction approach is to achieve the build-out of all the required new and altered facilities with the minimum practicable disruption to the operation of the airport and highways and to limit the adverse impacts on the local community, businesses, road users and the environment as far as reasonably practicable. This will include the impact of the required works on road users, pedestrians, cyclists, and local</p>



	<p>communities in relation to traffic management, noise, vibration and pollution control.</p> <p>Please refer to the <b>ES Appendix 5.3.2: Code of Construction Practice (CoCP)</b> [<a href="#">APP-082</a>] which outlines the environmental management system and measures that will be in place during the Project construction and ensures that best practice standards will be applied. The CoCP is to be secured under Requirement 7 of the <b>Draft DCO</b> [<a href="#">AS-127</a>].</p>
<p>Construction Carbon emission concerns</p>	<p>As per the <b>ES Appendix 5.4.2: Carbon Action Plan</b> [<a href="#">APP-091</a>], the Applicant recognises the role that it plays in supporting the transition to a global low carbon future for the aviation industry, whilst also recognising and maintaining the critical role that aviation plays in boosting trade, tourism and travel. Sustainability is a key business priority and a core aspect of GAL operations. Please refer <b>ES Appendix 5.4.2: Carbon Action Plan</b> [<a href="#">APP-091</a>], for more details.</p>
<p>Construction traffic disruption on local roads</p>	<p>The Project has considered the impact of construction traffic on the local road infrastructure and proposes mitigation measures and procedures to be in place during the construction period. The mitigation measures have been informed by the assessment work within the ES, including in relation to air quality, and noise and vibration. Please refer to <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>], <b>ES Chapter 13: Air Quality</b> [<a href="#">APP-038</a>] and <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] for further detail.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice: Annexes 2 and 3 - Outline Construction Traffic Management Plan (oCTMP)</b> [<a href="#">APP-085</a>] and the <b>Outline Construction Workforce Travel Plan (oCWTP)</b> [<a href="#">APP-084</a>] set out how the Project will manage and minimise impacts of construction traffic</p>

	<p>during the construction phase. Both outline plans are secured by Requirements 12 and 13 of the <b>Draft DCO</b> <a href="#">[AS-127]</a> respectively, with detailed plans to be submitted and approved before commencement of the Project.</p>
<p>Construction noise</p>	<p>Noise impacts have been predicted based on assumed standard methods of working and that the Best Practicable Means to reduce noise on site are adopted with the use of Section 61 applications through which the Contractor applies to the local authority for prior consent to carry out the works stating all the measures that will be implemented to minimise noise disturbance.</p> <p>Overall, with mitigation the assessment results indicate that there is potential for significant adverse noise effects at approximately 37 properties during the day and approximately 10 during the night in the Longbridge Road, Riverside Park area nearest the required highways works. See <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> for further information.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> sets out measures to minimise noise and vibration from construction activities, including the requirement for contractors to use quieter machinery and equipment and construction methods which are not inherently noisy. Taking the proposed mitigation measures into account, the potential for impacts arising from construction traffic has been assessed as not significant.</p>
<p>View that the alteration of the emergency runway has been understated</p>	<p>Gatwick Airport currently has two runways, comprising the main runway and the northern runway which cannot be used concurrently. The existing runways are described in further detail in <b>ES Chapter 4: Existing Site and Operations</b> <a href="#">[APP-029]</a>.</p>

	<p>To enable both runways to be used concurrently for departing aircraft, the Project proposes to reposition the existing northern runway 2m north of its current location (measured from the centreline). This distance is sufficient for safe operation and required to meet European Aviation Safety Agency standards for parallel runways. The redundant areas of the existing northern runway will be returned to grass.</p> <p>Further detail on the Project proposals are contained in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a> and <b>ES Project Description Figures</b> <a href="#">[AS-135]</a>.</p>
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## 4.9 Consultation

- 4.9.1 Table 4.9.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.9.1 Consultation**

Summary of issues raised in the RRs	The Applicant’s response
The DCO application should not be approved without full agreement from local residents.	<p>Noted. The Planning Act 2008 process was introduced to streamline the decision-making process for major infrastructure projects. The Applicant has consulted on the proposals put forward as part of the Application through the pre-application process. The Applicant’s reply to the responses received is set out in the <b>Consultation Report</b> <a href="#">[APP-218]</a> and its appendices.</p> <p>The views of local residents will be considered by the Examining Authority as part of the Examination process and taken into account when determining whether to grant the DCO, in line with the Planning Act 2008.</p>
The pre-application consultations were inadequate, with specific	The Applicant formed a Noise Envelope Group to seek views on the noise envelope and guide development of the final proposal for the DCO

<p>regard to the Noise Envelope which was not consulted on in sufficient detail and did not take into account local resident and stakeholder input.</p>	<p>application. Terms of reference were produced, and two sub-groups were established; the Local subgroup and the Aviation sub-group, to facilitate discussions with local communities, local authorities, and aviation stakeholders.</p> <p>A total of 12 meetings were held between 26 May and 11 October 2022. These were structured around four themes drawn from consultation feedback and the CAP1129 guidance. <b>ES Appendix 14.9.8: The Noise Envelope Group Output Report</b> [<a href="#">APP-178</a>] provides a summary of the group’s work and <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [<a href="#">AS-023</a>] provides a report on the engagement undertaken in relation to the Noise Envelope including minutes of meetings, papers presented and key documents submitted.</p>
<p>The consultation was inadequate in scope, lack of sufficient publication and consultation material did not clearly explain the proposals and impact on local areas.</p>	<p>Full details of the consultation carried out are included in the <b>Consultation Report</b> [<a href="#">APP-218</a>]. The main stages of consultation comprised:</p> <ul style="list-style-type: none"> <li>• A non-statutory consultation ran from 18<sup>th</sup> October 2018 to 10<sup>th</sup> January 2019 on the Draft Master Plan 2018. The Draft Master Plan looked at how Gatwick Airport could make best use of the existing runways and infrastructure and meet growing demand for air travel.</li> <li>• A statutory consultation ran for 12 weeks from 9<sup>th</sup> September to 1<sup>st</sup> December 2021. The consultation set out the key elements required to enable dual runway operations and support increased passenger numbers, along with a PEIR which presented the preliminary findings of the environmental impact assessment of the Project's proposals as at that point in time. It also included information about the</li> </ul>

	<p>economic benefits of the Project, an updated Noise Insulation Scheme, a Homeowners Assisted Moving Scheme, and the proposed approach to construction.</p> <ul style="list-style-type: none"> <li>• A hybrid statutory/non-statutory consultation ran for six weeks from 14<sup>th</sup> June to 27<sup>th</sup> July 2022. A targeted, statutory consultation considered changes to the proposed highway improvement works. The non-statutory Project update that formed part of the consultation included proposed changes to other aspects of the proposals, namely car parking, the airfield, hotels and offices, and the strategies relating to water management, carbon, noise, as well as other Project updates.</li> </ul> <p>Details relating to how the consultations were publicised are contained within the <b>Consultation Report</b> [<a href="#">APP-218</a>] and <b>Consultation Report Appendices</b> [<a href="#">APP-223</a> to <a href="#">APP-244</a>].</p>
<p>Consultation material were misleading and promoted the benefits of the NRP and understated the potential adverse impacts.</p>	<p>The Applicant approached consultation with a commitment to ensuring consultees were given the opportunity to understand and provide feedback on the proposals. The information included in the consultation materials was an accurate reflection of the technical and environmental assessment work that had been undertaken at that time.</p>
<p>Inadequate engagement with Local Authorities.</p>	<p>Section 3.4 of the <b>Consultation Report</b> [<a href="#">APP-218</a>] summarises GAL's engagement with local authorities regarding the Project.</p> <p>The 2001 Gatwick Section 106 Agreement entered into by Crawley Borough Council, West Sussex County Council and the Applicant,</p>

	<p>includes a requirement (under Obligation 11.6), for Crawley Borough Council to organise regular meetings with a group of interested Local Authorities. The Gatwick Officer Group comprises ten local authorities that meet on a monthly basis to discuss airport related matters, including the Project. This has been continued through to the 2022 Section 106 Agreement.</p> <p>Further to this, the Applicant established topic working groups (TWGs) to engage in the development of the scope and methodologies for the environmental and socio-economic and other studies. A summary of issues covered in each TWG meeting is included in <b>Consultation Report Appendices Part A</b> <a href="#">[APP-233]</a>, <b>Consultation Report Appendices Part B – Volume 19</b> <a href="#">[APP-242]</a> and <b>Consultation Report Appendices Part C – Volume 2</b> <a href="#">[APP-244]</a>.</p>
<p>View that the scheme options presented during consultations were selected to meet industry goals rather than having a genuine concern for community impacts.</p>	<p>A summary of the reasonable alternatives considered by the Applicant during the optioneering and design stage is set out in <b>ES Chapter 3: Alternatives Considered</b> <a href="#">[APP-028]</a>.</p> <p>Pre-application consultation and engagement have been key features of the development of the Project, enabling continuous improvements to the Applicant’s proposals and related assessments that form the basis of this DCO application. The outcomes of this consultation and engagement, including any changes to the proposals as a result, is captured in the <b>Consultation Report</b> <a href="#">[APP-218]</a>.</p>
<p>Concern that the Applicant has overstated local support as part of its consultations, including the claim that 78% support the proposals.</p>	<p>The survey referred to in the response was the most recent commissioned by the Applicant between 18<sup>th</sup> May and 1<sup>st</sup> June 2023. This has been conducted separately to any consultations undertaken as part of the DCO application process.</p>

	<p>The survey was conducted via online interviews administered to members of the YouGov Plc UK panel (over 2.5 million individuals) with the total sample size of the survey being 3,180 adults (age 18+) living in Croydon, Surrey, Kent or Sussex. Of those 3,180 respondents, 1,716 respondents expressed an opinion in support or opposition for the Applicant's plans to bring tis standby runway into route use alongside its main runway. The remaining 1,464 respondents did not express an opinion.</p> <p>Of this sample, 78% of respondents indicated they were in favour of the NRP proposals (either 'strongly support' or 'tend to support', with 22% of respondents in opposition (either 'strongly oppose' or 'tend to oppose').</p>
<p>Public consultation is a futile exercise and does not meaningfully implement feedback received from residents and stakeholders.</p>	<p>Section 49(2) of the Planning Act 2008 places a requirement on the Applicant to have regard to any relevant responses received in response to consultation on the Project proposals.</p> <p><b>Consultation Report Annex A</b> <a href="#">[APP-219]</a> explains how the Applicant has had regard to feedback from the Autumn 2021 Consultation and <b>Annex C</b> <a href="#">[APP-221]</a> explains how the Applicant has had regard to feedback provided in the Summer 2022 Consultation.</p>
<p>Concerns that the Applicant has previously made misleading statements and changes without consultation on matters not relating to NRP.</p>	<p>It is unclear from the responses what these specific changes are. Gatwick Airport is able to undertake some development at its estate through its permitted development rights. Any changes to airspace is and will be consulted upon.</p>
<p>Concern due to the early closure of Relevant Representation period.</p>	<p>Due to a technical error, the relevant representations response form on the Planning</p>

	<p>Inspectorate website closed a day in advance of the publicised closing day.</p> <p>In response, the Applicant and PINS reopened the relevant representations period to ensure anyone who wished to register as an Interested Party was able to do so.</p>
<p>Concern over the selection of the Examining Authority and impartiality of the Inspectors in reviewing the application.</p>	<p>The Examining Authority is appointed by the Planning Inspectorate in accordance with the Planning Act 2008 – the Applicant is not involved in the selection of panel members in any capacity.</p> <p>The Examining Authority has a duty to be impartial and fair when examining the application.</p>

#### 4.10 Cumulative Effects and Interrelationships

4.10.1 Table 4.10.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.10.1 Cumulative Effects and Interrelationships**

Summary of issues raised in the RRs	The Applicant’s response
<p>Concern that cumulative impacts as a result of development required to support growth at Gatwick Airport have not been considered.</p>	<p><b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> [APP-045] provides an assessment of the cumulative effects that may be experienced as a result of the Project and other developments. It takes into account the short-list developments beyond the airport which are set out in <b>ES Appendix 20.4.1: Cumulative Effects Assessment Long and Short List</b> [APP-216].</p> <p><b>ES Chapter 17: Socio-Economic</b> [APP-042] assesses the impact on community facilities including schools and access to healthcare.</p>



## 4.11 Design

4.11.1 Table 4.11.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.11.1 Thematic issues and the Applicant’s response – Design**

Summary of issues raised in the RRs	The Applicant’s response
<p>Lack of clarity regarding the nature of the proposals in terms of whether a new runway south of the existing main runway is proposed or if the existing emergency runway will be extended.</p>	<p>This application relates to the NRP, entailing making best use of Gatwick Airport’s existing second (emergency) runway. The works proposed as part of the Project are described in detail in <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>].</p> <p>The application does not relate to the expansion or utilisation of the safeguarded land to the south of the airport, which is a matter for government policy.</p>
<p>Concern that the airport boundary is to be expanded.</p>	<p>The airport boundary is shown in the <b>Glossary</b> [<a href="#">APP-004</a>].</p> <p>The proposed Project works are substantially contained within the existing airport boundary. The principal works outside the boundary relate to the highway works and the proposed water treatment works to the south-east of the airport.</p>
<p>Support for the Project in re-purposing and utilising the existing airport infrastructure.</p>	<p>Noted. The Applicant welcomes support for the Project.</p>
<p>Support or the Project in being sympathetically designed to minimise environmental impacts.</p>	<p>Noted. The Applicant welcomes support for the Project.</p>

<p>Request that safeguarded land to the south of the airport for a new runway is released.</p>	<p>This application relates to the NRP, entailing making best use of Gatwick Airport’s existing second (emergency) runway.</p> <p>As set out in the <b>Planning Statement</b> [APP-245], any decisions in respect of an additional runway to the south of the airport, would be a matter for government policy. As such, it is not a matter pertinent to the NRP or the determination of this DCO Application.</p>
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#### 4.12 Draft DCO, Consents and Agreements

4.12.1 Table 4.12.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.12.1 Thematic issues and the Applicant’s response – Draft DCO, Consents and Agreements**

<b>Summary of issues raised in the RRs</b>	<b>The Applicant’s response</b>
<p>Enforcement policies should be implemented for aircraft noise, with strict penalties for non-compliance.</p>	<p>Requirements 15 – 17 in Schedule 2 to the <b>Draft Development Consent Order</b> [AS-127] secure the noise mitigation measures for the Project. In particular, Requirement 15 provides that, from the commencement of dual runway operations, the authorised development must be operated in accordance with the relevant noise envelope limits set out in Section 6 of <b>ES Appendix 14.9.7: The Noise Envelope</b> [APP-177].</p> <p>Requirement 15(5) provides that the undertaker shall not be permitted to declare any further capacity for commercial air transport movements from the airport in the event that (i) two consecutive annual monitoring and forecasting reports identify that the same noise envelope limit has been exceeded during the previous 24 months’ operation of the airport or (ii) one such report identifies that a noise envelope limit is forecast to be exceeded, until a report is</p>

	<p>approved by the CAA or Secretary of State which confirms compliance with the relevant limit.</p> <p>Requirement 15 therefore imposes a strict penalty on GAL should aircraft noise exceed the limits committed to.</p>
<p>Concern at the lack of binding obligations on the undertaker.</p>	<p>The Development Consent Order which, should it be granted, would authorise the construction and use of the repositioned northern runway and contains many obligations with which the undertaker (GAL) must comply in exercising the powers conferred upon it.</p> <p>Most notably, Schedule 2 to the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a> contains the Requirements with which GAL must adhere, which operate similarly to conditions to a planning permission granted by a local authority. The current draft order contains 23 requirements which cover a range of topics including timing, detailed design approval, drainage, traffic management, carbon and noise.</p> <p>Specific binding obligations are imposed upon the undertaker by these requirements. Breach of the terms of a development consent order is a criminal offence under section 161 of the Planning Act 2008.</p> <p>GAL will also enter into a planning agreement with the relevant local planning authorities pursuant to section 106 of the Town and Country Planning Act 1990. By this agreement, GAL will covenant to the Councils to perform a series of obligations, including in relation to air quality, noise, surface access, employment and skills.</p>
<p>Concern that surface access and transport mitigation measures have</p>	<p>Surface access and transport mitigation measures are secured by the requirements in Schedule 2 to the <b>Draft DCO</b> <a href="#">[AS-127]</a> and the</p>

not been adequately secured in the draft DCO.

secondary documents referenced therein. By way of non-exhaustive summary:

Requirement 6 requires the undertaker to use reasonable endeavours to obtain a provisional certificate from National Highways (i.e. complete the works to the national highway serving the airport) by the third anniversary of the commencement of dual runway operations. This will ensure that the necessary surface access is in place to cater for local growth and increasing air transport movements.

Requirements 12 and 13 prevent the commencement of the authorised development until a construction traffic management plan and construction workforce travel plan (respectively) have been approved by the relevant highway authority in consultation with the relevant planning authority. These plans must be substantially in accordance with the outline plans submitted as **ES Appendix 5.3.2: Code of Construction Practice Annex 3 – Outline Construction Traffic Management Plan** [[APP-085](#)] and **ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan** [[APP-084](#)]. These plans detail and secure a range of surface access and transport mitigation measures.

Requirement 20 provides that, from the commencement of dual runway operations, the authorised development must be operated in accordance with **ES Appendix 5.4.1: Surface Access Commitments** [[APP-090](#)].

Breach of the terms of a development consent order is a criminal offence under section 161 of the Planning Act 2008.

<p>Concern that there may be a further (third) runway or a new terminal at Gatwick Airport in the future and suggestion that the DCO should restrict any such expansion.</p>	<p>This application relates solely to the NRP, the components of which are detailed in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a>.</p> <p>The construction of a further runway or new terminal, which does not form part of the present application, would require planning permission or development consent of its own, which would only be granted following detailed scrutiny in the requisite planning process, with opportunity for any interested party to comment. It is therefore unnecessary to make provision regarding hypothetical future development in the development consent order for the NRP.</p>
<p>Suggestion that the DCO should impose a ban on night flights.</p>	<p>Requirement 19(3) in Schedule 2 to the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a> provides that the repositioned northern runway must not be routinely used between the hours of 23:00 – 06:00.</p>
<p>There has been inadequate explanation of the interaction between the DCO and the airport operator’s permitted development rights.</p>	<p>As an airport operator, GAL can utilise the permitted development right set out in Schedule 2, Part 8, Class F of the Town and Country Planning (General Permitted Development) (England) Order 2015 (the “<b>2015 Regulations</b>”) for the “<i>carrying out on operational land... of development (including the erection or alteration of an operational building) in connection with the provision of services and facilities at a relevant airport</i>”.</p> <p>This right is unaltered by the provisions of the <b>Draft DCO</b> <a href="#">[AS-127]</a>. Article 9(5) of the Draft DCO provides that nothing in the Order restricts the undertaker from seeking or implementing planning permission, which includes planning permission deemed to be granted pursuant to the 2015 Regulations.</p>

#### 4.13 Ecology and Nature Conservation

4.13.1 Table 4.13.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.13.1 Thematic issues and the Applicant’s response – Ecology and Nature Conservation**

Summary of issues raised in the RRs	The Applicant’s response
<p>General impacts to wildlife and habitats (including Riverside Garden etc.) from NRP</p>	<p>The impact of the Project on ecology has been fully assessed through the Environmental Impact Assessment process, the results of which are set out in <b>ES Chapter 9: Ecology And Nature Conservation</b> [APP-034]. The assessment process was based on detailed ecology surveys undertaken over a period of four years (2019 to 2023), the results of which are set out in the various appendices to Chapter 9.</p> <p>The assessment process followed good practice guidelines and considered all Important Ecological Resources identified. This includes designated sites, habitats and flora/fauna. No residual significant adverse effects were identified with the overall conclusion of the assessment that the Project would have a net benefit for ecology, as demonstrated by the circa 20% Biodiversity Net Gain.</p>
<p>Impacts to Ashdown Forest</p>	<p>Potential impacts to Ashdown Forest SPA/SAC were fully assessed as part of <b>ES Appendix 9.9.1: Habitats Regulations Assessment Report</b> [APP-134]). This concluded there would be no adverse effect on the integrity of Ashdown Forest. This conclusion has been agreed with Natural England in their Relevant Representation [RR-3223].</p>
<p>Impacts to ancient woodland</p>	<p>The Project includes a commitment to maintain a 15m buffer during construction to all areas of ancient woodland, as set out in the <b>ES Appendix</b></p>

	<p><b>5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>. Impacts to ancient woodland have been assessed in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. The overall conclusion of this is that there would be no effect to this receptor.</p> <p>Further work is on-going to determine the effect of changes in air quality on some parcels of ancient woodland that are also SSSI. Such work will be reported once complete.</p>
<p>Assess ecology impacts at landscape scale</p>	<p>As set out from paragraph 9.4.9 onwards of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>, 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.). As such, the impact assessment has considered impacts outwith the DCO limits, where there is the potential for such impacts to occur.</p>
<p>Loss of habitat for long-horned bee</p>	<p>The population of long-horned bee is centred around the bund to the east of the River Mole within the North West Zone Biodiversity Area. This area is to be retained and will, ultimately, be enhanced once the Mole diversion is complete. This species was considered within the invertebrate assemblage Important Ecological Feature with the overall conclusion that the Project would lead to a minor beneficial effect on the assemblage, which would include the long-horned bee.</p>
<p>Impacts to birds</p>	<p>Impacts to birds have been assessed through the consideration of both breeding and wintering species in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. The overall conclusion of this assessment is that there would be a moderate adverse effect on breeding birds through the loss of breeding habitat during</p>

	<p>the construction period but that, overall, there would be a minor beneficial effect through the new habitat creation proposed.</p>
<p>General impacts from changes in air quality, particularly from that relating to aircraft.</p>	<p>Changes to air quality and associated impacts on ecology receptors at the habitat level have been considered within Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. No significant effects on were identified on any of the habitats considered.</p>
<p>Noise impacts on fauna</p>	<p>The impacts of noise disturbance on ecology receptors has been assessed in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. No adverse effects were identified.</p>
<p>Impact of light pollution on wildlife</p>	<p>Impacts from light pollution have been assessed in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. The embedded mitigation with respect to light pollution is set out in Table 9.8.1 of Section 8 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>.</p>
<p>Impacts to River Mole</p>	<p>Impacts to the River Mole have been assessed in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. The overall conclusion of this is that there would be a moderate beneficial effect in the long term through the re-naturalising of part of the channel.</p>
<p>Impacts to SSSI</p>	<p>Impacts to SSSI have been assessed in Section 9 of <b>ES Chapter 9: Ecology And Nature Conservation</b> <a href="#">[APP-034]</a>. The overall conclusion of this is that there would be no effect to these receptors.</p> <p>Further work is on-going to determine the effect of changes in air quality on some parcels of ancient woodland that are also SSSI. Such work will be reported once complete.</p>



#### 4.14 General

4.14.1 Table 4.14.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.14.1 Thematic issues and the Applicant’s response – General**

Summary of issues raised in the RRs	The Applicant’s response
General statement of support for NRP.	Noted. The Applicant welcomes the support for the Project.
General statement of opposition for NRP.	Noted.
Registration as an Interested Party with no particular view of the NRP expressed.	Noted.
Gatwick Airport Limited should not be allowed to expand until it reduces its current operational impacts and mechanisms are in place to minimise likely impacts arising from NRP.	<p>As set out in the <b>Planning Statement</b> [APP-245], there are existing measures that control airport operations including the planning permission granted in 1979 (CBC Application Reference: CR/125/79). Other controls and restrictions (such as number of flights) are described in the Applicant’s response to Procedural Decision 007 ‘<b>Information regarding controls over the existing use of the airport</b>’ [AS-115].</p> <p>Where significant adverse impacts have been identified as part of <b>Book 5: Environmental Statement</b>, mitigation and controls have been identified to avoid, reduce and, if possible, offset those significant impacts. This mitigation will be legally secured by clear and enforceable controls to ensure they are adhered to throughout the construction and operation of the Project as set out in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [APP-078].</p>

<p>Concern about the general impact on the local area, including the environmental impact of the proposals and increased flights. There are some views that the DCO application does not adequately consider the environmental impacts of NRP.</p>	<p>The environmental impact of the Project has been assessed as part of the DCO application. <b>Book 5: Environmental Statement</b> includes topic-specific chapters.</p> <p>Where significant adverse impacts have been identified, mitigation and controls have been identified to avoid, reduce and, if possible, offset those significant impacts. This mitigation will be legally secured through clear and enforceable controls to ensure they are adhered to throughout the construction and operation of the Project, as set out in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [<a href="#">APP-078</a>].</p>
<p>Airport capacity and air travel should be reduced in general rather than expanded.</p>	<p>Forecast aviation demand in the UK and in London and the South East, is provided in the <b>Needs Case</b> [<a href="#">APP-250</a>]. The Project would provide capacity to meet forecast increases in aviation passenger demand in the medium and long terms. Government policy recognises also the importance of aviation, as set out in the <b>Needs Case</b> [<a href="#">APP-250</a>] and <b>Planning Statement</b> [<a href="#">APP-245</a>].</p>
<p>The DCO application should separately assess the impacts of a scenario without NRP in addition to with NRP.</p>	<p>The assessments carried out for the Project take into consideration a ‘without scheme’ scenario to determine the degree of change between the future baseline environment without the Project and the future environment with the Project. <b>ES Chapter 6: Approach to Environmental Assessment</b> [<a href="#">APP-031</a>] provides further details of the methodology used for the ES.</p> <p>The assessments, for instance for traffic or noise, take account of the effects of NRP project, as well as other growth that may be achieved in the meantime.</p>
<p>Concern that NRP will lead to further development and</p>	<p>Crawley Borough Council is currently undertaking a Local Plan review which, at the time of writing,</p>

<p>expansion of Crawley town.</p>	<p>is within the examination process. The Local Plan is the planning mechanism to promote/restrict further development or expansion within Crawley town.</p> <p>The Application only seeks permission for the works set out within Schedule 1 of the <b>Draft DCO</b> [<a href="#">AS-127</a>]. This does not include any development within Crawley town. While the Project may encourage local development, any development not included within the scope of the Application will be subject to the relevant planning regime and will likely require separate planning permission from the local planning authority.</p>
<p>The NRP is expensive and is not a good use of money.</p>	<p>Gatwick Airport is privately owned and no taxpayer money would be used to finance the Project. Government policy encourages private sector investment in airport infrastructure.</p> <p>Further detail of Project costs and funding is set out in Section 3.2 of the <b>Funding Statement</b> [<a href="#">APP-009</a>].</p>
<p>The NRP will alleviate pressures on London airspace. Additional runway capacity is needed at Gatwick and that the proposed expansion is a good use of existing infrastructure and is a cost effective solution.</p>	<p>Noted. The Project will provide additional capacity which is needed to enhance the operation of the airport, add resilience and meet forecasts of demand.</p> <p>The Project is an innovative means of achieving additional runway capacity at Gatwick Airport, for the South-East and for the UK without the scale of land take and associated impacts normally associated with providing a new additional runway.</p>
<p>Interest as to how the NRP will impact local residents' day-to-day life including their commute.</p>	<p>The environmental impact of the Project has been assessed as part of the DCO application. <b>Book 5: Environmental Statement</b> includes topic-specific chapters.</p>

	<p><b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] covers the traffic and transport effects on people arising from the Project and provides an assessment on severance, driver delay, pedestrian and cyclist delay and amenity, accidents and safety, hazardous loads, and effects on public transport amenity.</p>
<p>The NRP will provide benefits including reduced air travel fares and improved resilience.</p>	<p>Noted. The resilience and operational performance benefits are described in Section 7 of the <b>Needs Case</b> [<a href="#">APP-250</a>].</p> <p>It is expected that, by alleviating the capacity constraints at Gatwick Airport, the Project would increase the number of flights that the airport can accommodate, and therefore enable airlines to increase service frequencies. Congestion premiums that are related to capacity constraints and are reflected in air fares would decrease, leading to lower fares for passengers.</p>
<p>Support for utilising existing emergency runway rather than building a completely new runway.</p>	<p>Noted. The Project is an innovative means of achieving additional runway capacity at Gatwick Airport, for the South-East and for the UK without the scale of land take and associated impacts normally associated with providing a new additional runway.</p>
<p>Support for NRP to be implemented as soon as possible.</p>	<p>Noted. The Project is expected to become operational in 2029 ready to meet demand for additional capacity that cannot be provided on the main runway.</p>
<p>Support for NRP provided that the same restrictions that apply to the main runway are applied.</p>	<p>Noted. The repositioned northern runway would be subject to the same operational and regulatory regimes that apply to the main runway. Generally, aircraft arriving at Gatwick Airport would use the main runway with shared departures between the main runway and the repositioned northern runway. The Applicant is</p>

	not seeking to increase the quota count for aircraft movements within core night hours.
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#### 4.15 Geology and Ground Conditions

4.15.1 Table 4.15.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.15.1 Thematic issues and the Applicant’s response – Geology and Ground Conditions**

Summary of issues raised in the RRs	The Applicant’s response
The NRP will adversely impact groundwater quality.	The impact of the NRP on groundwater quality has been assessed within <b>ES Chapter 10: Geology and Ground Conditions</b> [APP-035] and <b>ES Chapter 11: Water Environment</b> [APP-036]. No significant effects on groundwater quality were identified as a result of the NRP.

#### 4.16 Greenhouse Gases

4.16.1 This section contains matters relating to Greenhouse Gases and includes where a respondent has referred to ‘climate change’ but not within the context of Climate Change Resilience (CCR) or In-Combination Climate Change Impacts (ICCI). Matters in relation to CCR or ICCI are set out in the Climate Change section above.

4.16.2 Table 4.16.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.16.1 Thematic issues and the Applicant’s response – Greenhouse Gases**

Summary of issues raised in the RRs	The Applicant’s response
General issue relating to increased emissions and resulting risk to achieving carbon budgets or Net Zero Target	The increase in emissions from a range of sources arising from the Proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the future baseline scenario (in the absence of the Proposed Development) is not disputed.

	<p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
<p>Specific reference to the impacts arising from aviation</p>	<p>The assessment specifically includes the emissions arising from increases in aviation as set out in Table 16.4.1 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>Reference to the impacts arising from other sources e.g. surface access, construction etc.</p>	<p>The assessment specifically includes the emissions arising from a range of emissions sources as set out in Table 16.4.1 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>Challenging how the assessment can be compatible with the recommendations from the Climate Change Committee</p>	<p>The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government's target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government's most recent response responded to the Progress Report 2022.</p> <p>In this most recent response to the CCC (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 (which explicitly includes the growth assumed as part of NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
<p>Challenge as to how robust the Jet Zero Strategy is</p>	<p>It is not for the Applicant or for the examination of the NRP to assess risks on the basis that government policy will fail. It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p>
<p>Referencing the reliance of the Jet Zero Strategy, and hence the assessment, on new technologies</p>	<p>Section 16.2.5 to 16.2.27 within <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> set out the Jet Zero Strategy and the decarbonising trajectory that this strategy commits to achieving.</p>

	<p>Paragraph 16.2.27 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> establishes that the Jet Zero Strategy itself recognises the reliance on new technologies to achieve decarbonisation, and that the rate of development of these - and their respective contribution to emissions reductions in the sector - cannot be fully assumed at this point in time. However it also restates the Jet Zero Strategy commitment to review the Strategy every five years.</p> <p>The uncertainties within the rate of different technologies to contribute to the Jet Zero trajectory are also discussed in Paragraph 16.5.4 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. This discusses the inherent uncertainties in the degree of emissions reductions from different technologies to reach the Jet Zero end point in 2050, but argues that the certainty contained within this Jet Zero commitment (and the underlying analysis by UK Government to support it) it is entirely reasonable to base the assessment of GHGs on a similar rate of technological development</p>
<p>Lack of consideration of non-CO<sub>2</sub> emissions within the GHG Assessment</p>	<p>The approach adopted on non-CO<sub>2</sub> impacts reflects the guidance from the UK Government as set out in the Jet Zero Strategy and is discussed in Section 16.4.12 onwards within the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p>
<p>Challenge to PINS on their approach to non-CO<sub>2</sub> emissions and whether this is appropriate</p>	<p>This comment reflects a challenge to PINS on their treatment of non-CO<sub>2</sub> impacts. It is not for the Applicant to direct the Planning Inspectorate as to their approach to consideration of the Jet Zero Strategy.</p>
<p>Challenge to GAL regarding the commitment and level of ambition for</p>	<p>As stated within <b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a> "Gatwick will achieve Net Zero for GHG emissions under our control (GAL Scope 1 and 2) by 2030", which is ten years</p>



<p>their corporate commitments</p>	<p>ahead of the Government’s expectation set out in the Jet Zero Strategy.</p>
<p>Challenge that impacts from land use emissions, or sequestration loss, not adequately considered.</p>	<p>Section 7 of <b>ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions [APP-191]</b> considers the changes arising from land use change both during construction activity, and in the future for habitat areas retained or created during the delivery of the NRP. This concludes that the expected change arising from changes in land use is unlikely to be material to the overall assessment of GHG emissions and are not considered to affect the assessment of significance.</p>
<p>Challenge that the DCO offers insufficient scale of commitment or level of detail in mitigation measures</p>	<p><b>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</b> focusses on three key airport emission sources: airport buildings and ground operations, aviation and construction. Under each heading the CAP sets clear outcomes that GAL is committing to deliver.</p> <p>To achieve those outcomes, GAL will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve. These measures are deliberately not prescriptive to ensure GAL retains appropriate and necessary flexibility to identify and implement those measures which are determined to be most effective. This flexibility is particularly necessary in view of the fast-evolving technological background which will inevitably introduce new potential measures that will be utilised to deliver on the commitments in the CAP. However, whilst there is discretion as to the individual measures to be used, the overarching commitments to which they relate are fixed and committed to under the CAP, which is secured through requirement 21 of Schedule 2 to the <b>Draft DCO</b></p>

	<p><a href="#">[AS-127]</a>. This provides certainty as to the outcomes which GAL must deliver, regardless of how it chooses to achieve them.</p>
<p>Challenge regarding the inappropriateness of offsetting as part of the mitigation strategy</p>	<p><b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a> commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. As set out in section 4.2 of the Carbon Action Plan, GAL seeks to reduce emissions as far as possible by 2030 for ABAGO (adopting carbon removal strategies to balance residual emissions for this target date) but by 2040 onwards commits to reach a point where such carbon removals are no longer required.</p>
<p>General reference to Pollution that does not specifically reference GHGs</p>	<p>Inasmuch as the reference to pollution is taken to include greenhouse gases, the increase in emissions from a range of sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the future baseline scenario (in the absence of the Proposed Development) is not disputed.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>

#### 4.17 Health and Wellbeing

4.17.1 Table 4.17.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.17.1 Thematic issues and the Applicant’s response – Health and Wellbeing**

Summary of issues raised in the RRs	The Applicant’s response
<p>Health and wellbeing effects from changes to air quality.</p> <p>The following issues were raised: fumes and pollution from aircraft and road traffic; damage to health and quality of life; causing and exacerbating particular health conditions; specific pollutants that affect health; fuel exhaust, waste and odour; physical and mental wellbeing; environmental degradation; air particle pollution and fine particulate matter (PM<sub>2.5</sub>); worry about health and aircraft pollutants; World Health Organization findings on air quality; literature on health outcomes linked to air quality; ultra fine particulates; dust inhalation; and health risks for residents, particularly the young, elderly and</p>	<p><b>ES Chapter 13: Air Quality [APP-038]</b> sets out the air quality assessment for the Project, with quantitative models of emissions from both air and ground sources, including traffic. <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> section 18.8 ‘Health and Wellbeing Effects from Changes to Air Quality’ considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders.</p> <p>The health assessment considers exposures against statutory health protection standards, as well as effects below these levels. Careful consideration is given to the scientific understanding of the effects of air pollutants, including fine particulate matter and ultra fine particulates. The high sensitivity of particular population groups is noted, including children, older people and those with existing poor health, and this is taken into account by the assessment.</p> <p>The assessment notes the Project approach set out in <b>ES Chapter 13: Air Quality [APP-038]</b> to reduce air pollutant emissions even where there would not be significant effects in terms of statutory air quality standards. The role of measures adopted to mitigate and monitor dust and construction emissions is also noted. These are detailed in the <b>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-</b></p>

<p>those with pre-existing respiratory conditions.</p>	<p><a href="#">161</a>] and <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>. The health assessment concludes that the Project’s emissions from air and ground sources would not have significant public health implications.</p>
<p>Health and wellbeing effects from changes in noise exposure.</p> <p>The following issues were raised: impacts on emotional wellbeing and socialising; sleep deprivation and sleep quality; disturbance and ability to relax; distress and irritation; physical and mental health effects of aviation noise; quality of life and wellbeing; stress, anxiety and depression; outdoor space use; exacerbation of particular health conditions; loss of tranquillity, amenity and property enjoyment; insufficient noise insulation; motorway and traffic noise; flight frequency; daytime functioning, lost productivity and concentration; summer opening of windows and ventilation to manage heat; nuisance; noise in green spaces and gardens; effects to living conditions; being too elderly or ill to relocate; pausing</p>	<p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> sets out the noise assessment for the Project. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes to Noise Exposure’ considers the population health implication of the changes due to the Project. The health assessment references and has regard to the WHO noise guidelines, as well as other scientific research on the health effects of noise. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment considers noise from aircraft, ground noise at the airport and road transport noise. The assessment considers relevant noise exposure thresholds as well as health effects of noise at lower levels.</p> <p>The health assessment recognises the sensitivity of the surrounding population to aviation noise and transport noise, including high selectivity amongst vulnerable groups. An adverse effect is noted acknowledging that there will be additional noise for some people and some people will be sensitive to aviation noise even below thresholds that are generally considered acceptable. The assessment gives weight to the Project’s enhanced Noise Insulation Scheme (<b>ES Appendix 14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a>), as well as the other design and management measures that control noise, as described in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. With these measures taken into account, the health assessment concludes that the change in noise due to the Project should</p>

<p>conversations and community events as flights pass; sensitive groups including the young, vulnerable, elderly and those with poor health; children’s learning and brain health; intrusive sound; early morning and night-time noise; World Health Organization findings on noise; literature on health outcomes linked to noise exposure; impact on working from home; and existing noise levels and antisocial flight paths.</p>	<p>not result in any significant adverse impact on public health. The assessment has been scrutinised by the UK Health Security Agency and the Department of Health and Social Care Office for Health Improvement and Disparities and they agree with this conclusion.</p>
<p>Health and wellbeing effects from changes in transport nature and flow rate.</p> <p>The following issues were raised: road safety; access; lack of surface transport; road congestion; pressure on rural roads and villages; accident rates; travel to work delays; passenger traffic; rat runs; speeding traffic; problems with parking; targets for bus, train, walking and cycling airport access; safety of pedestrians and cyclists; public transport network</p>	<p><b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> sets out for the Project the assessment of highway changes, additional vehicle movements and options for accessing the airport. <b>Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes in Transport Nature and Flow Rate’ considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The health assessment considers changes in road traffic affecting road safety, travel times, accessibility and active/sustainable travel. The assessment has regard to the substantive highway improvements that manage the additional traffic volumes and enhance the active and sustainable transport routes to, and around, the airport. In addition to the mitigating role of the highway improvements themselves, mitigation measures are also set out in the Outline Construction Workforce Travel Plan (<b>ES</b></p>

<p>coverage; heavy goods vehicle movement increases; train capacities and overcrowding; potholes; lack of capacity on existing roads around Gatwick; and an influx of workers adding to traffic.</p>	<p><b>Appendix 5.3.2: Code of Construction Practice – Annex 2</b> <a href="#">[APP-084]</a> and the Outline Construction Traffic Management Plan (<b>ES Appendix 5.3.2: Code of Construction Practice - Annex 3</b> <a href="#">[APP-085]</a>). The health assessment concludes that with these highway improvements and other measures in place there would not be a significant public health impact.</p>
<p>Health and wellbeing effects from changes in lifestyle factors.</p> <p>The following issues were raised: use of footpaths such as the Sussex Border Path; use of parks such as Riverside Garden Park; limited access to green space in Crawley; effect on fitness levels; need for expanding areas of open green space; and lack of affordable housing locally to enable workers to walk or cycle to work.</p>	<p><b>ES Chapter 19: Agricultural Land Use and Recreation</b> <a href="#">[APP-044]</a> sets out the public rights of way and open space assessment for the Project. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes in Lifestyle Factors’ considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment considers disruption and reduction of existing spaces used for leisure and recreation, including Riverside Garden Park, National Cycle Route 21 and the Sussex Border Path. The assessment also notes that new public open spaces for recreation would be created of a greater extent than that lost, and that there would be enhancements to active travel routes. The assessment identified the importance of open space and active travel routes locally and the high sensitivity of vulnerable groups. Having regard to the measures to minimise disruption, maintain access and provide enhancements, the assessment concludes that there would be both beneficial and adverse effects, but that these would not significantly affect public health. Mitigation measures include those set out in the <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a>.</p>

<p>Health and wellbeing effects from changes in socio-economic factors.</p> <p>The following issues were raised: economic effects to local homes; lack of local jobs; airport jobs being sourced from further afield; lack of economic benefits; concern about local prosperity and poverty; worker demand pressures on housing and schools; economic welfare of the area; socio-economic benefits; quality and stability of airport jobs; and impacts on local businesses.</p>	<p><b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> sets out the economic and employment assessment for the Project, including an assessment of population and housing effects in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a>. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 'Health and Wellbeing Effects from Changes in Socio-economic Factors' considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment notes that the benefits of employment to health are greatest when there is good quality stable employment. The assessment identifies the potential for significant benefits, particularly where job opportunities are successfully targeted to local vulnerable groups. The project commitments in this regard are linked to the Employment Skills and Business Strategy (<b>ES Appendix 17.8.1: Employment Skills and Business Strategy</b> <a href="#">[APP-198]</a>).</p>
<p>Health and wellbeing effects from changes in exposure to light.</p> <p>The following issues were raised: open traffic views; artificial light exposure; background light levels; and light from aircraft movements and related traffic.</p>	<p><b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> sets out the visual assessment for the Project, including night-time lighting. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 'Health and Wellbeing Effects from Changes in Exposure to Light' considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment finds that changes in exposure to artificial light at night due to the Project would not give rise to a significant public health impact. Effects are transitory or localised and often relate to greater visibility to road traffic lighting following vegetation clearance. A minor</p>

	<p>adverse effect is noted acknowledging that there will be some changes and some people will be sensitive to those changes. <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> describes the approach to mitigation, including measures in Section 4.9 of <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> and <b>ES Appendix 5.2.2: Operational Lighting Framework</b> <a href="#">[APP-077]</a>.</p>
<p>Health and wellbeing effects from changes to water quality, flood risk and ground conditions.</p> <p>The following issues were raised: pressure on water supplies; increased downstream flood risk; water pollution; impact on local drainage infrastructure; and discharges to the River Mole.</p>	<p><b>ES Chapter 10: Geology and Ground Conditions</b> <a href="#">[APP-35]</a> and <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-035]</a> sets out the assessment for potential pollution and contamination effects of the Project, as well as flood risk. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes to Water Quality, Flood Risk and Ground Conditions’ considers the population health implication of the changes due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment concludes that there is not the potential for significant public health effects linked to potable water supply capacity, pollution events or flood risk.</p>
<p>Health and wellbeing effects from changes to local healthcare capacity.</p> <p>The following issues were raised: pressure on local healthcare capacity; access to medical facilities; capacity of doctors, dentists and hospitals; stress on the NHS; additional NHS costs; no thought for extra hospitals</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 ‘Health and Wellbeing Effects from Changes to Local Healthcare Capacity’ considers the healthcare service implication of the changes in workforce and passenger numbers due to the Project. The assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment analyses healthcare capacities and ambulance callout rates to the airport. The assessment looks at the healthcare needs of workers and passengers and includes a range of commitments on managing</p>



<p>and GP practices; and increased care needs.</p>	<p>these. The analysis also supports the NHS with their routine healthcare planning for those entitled to its care, even when away from home. There have been discussions with the West Sussex Integrated Care Board on improving access to healthcare for workers at the airport, for example when shift work makes it hard to attend medical appointments or screening checks. The assessment concludes that with the protocols and service planning proposed in place the Project would not significantly affect public health.</p>
<p>Health and wellbeing effects from understanding of risk (risk perception).</p> <p>The following issues were raised: concern about health effects of electromagnetic radiation; aircraft incident safety concerns; and concern there would not be an emergency runway.</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>] section 18.8 ‘Health and Wellbeing Effects from Understanding of Risk (Risk Perception)’ considers the public health implication of the changes due to the Project that give rise to community concern. The issues discussed are electromagnetic fields, extended operational hazards (such as fuel storage) and pests. The assessment has been informed by <b>ES Appendix 5.3.4: Major Accidents and Disasters</b> [<a href="#">APP-089</a>], which also considers issues of aviation safety. The health assessment has been undertaken to the relevant guidelines and in consultation with the relevant public health stakeholders. The assessment finds that the actual risks on these issues are appropriately addressed through design and management measures of the Project. Furthermore, as the Project has addressed the actual risks, it is not expected that community concern would give rise to a significant public health effect.</p>

#### 4.18 Historic Environment

- 4.18.1 Table 4.18.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.18.1 Thematic issues and the Applicant’s response – Historic Environment**

Summary of issues raised in the RRs	The Applicant’s response
Air noise impacts on heritage assets	<p>An assessment has been undertaken regarding the likely impact of air noise changes on designated historic assets such as listed buildings and conservation areas.</p> <p>The assessment was carried out in accordance with the methodology set out in published guidance prepared on behalf of English Heritage (now Historic England)<sup>7</sup>. This methodology is identified in paragraph 5.194 of the Airports NPS as the appropriate guidance for the assessment of air noise impacts on heritage assets.</p> <p>The methodology is described in section 5.4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]</b> and the results of the assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment [APP-032]</b></p> <p>Historic England has advised in its Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>The methodology requires the establishment of ‘noise change footprints’ within which the predicted changes to the average summer daytime noise level (Leq 16 hr) would exceed 1dB. A negative ‘noise change footprint’ is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be an increase of more than 1dB, whereas a positive ‘noise change footprint’ is where the predicted change to the average summer daytime noise</p>

<sup>7</sup> (<https://historicengland.org.uk/research/results/reports/6934/AviationNoiseMetric-ResearchonthePotentialNoiseImpactsOntheHistoricEnvironmentbyProposalsforAirportExpansioninEngland>).

	<p>level (Leq 16 hr) would be a decrease of more than 1dB.</p> <p>Examination is then undertaken regarding the nature of designated heritage assets within the 'noise change footprints' to see if any fall into one of four categories of 'noise-sensitive' heritage assets defined within the guidance document.</p> <p>The assessment found that three designated heritage assets within the negative 'noise change footprint' could be identified as being within one of the four categories of noise-sensitive heritage assets.</p> <p>Detailed assessment was then undertaken regarding the predicted noise change at each of these three designated assets, using noise measurements at each location. In all cases the overall significance of effects was assessed as no change. This was due to the predicted air noise with the Project in place actually being slightly less than at present. This is set out in paragraphs 7.9.117- 7.9.122 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>.</p>
<p>Air noise and vibration impacts on Hever Castle</p>	<p>An assessment has been undertaken regarding the likely impact of air noise changes on designated historic assets such as listed buildings and conservation areas, including Hever Castle.</p> <p>The assessment was carried out in accordance with the methodology set out in published guidance prepared on behalf of English Heritage (now Historic England). This methodology is identified in the Airports NPS as the appropriate guidance for the assessment of air noise impacts on heritage assets.</p> <p>The methodology is described in section 5.4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a> and the results of the</p>

	<p>assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment</b> [<a href="#">APP-032</a>].</p> <p>Historic England has advised in its Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>The methodology requires the establishment of 'noise change footprints' within which the predicted changes to the average summer daytime noise level (Leq 16 hr) would exceed 1dB. A negative 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be an increase of more than 1dB, whereas a positive 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be a decrease of more than 1dB.</p> <p>The predicted changes to the average summer daytime noise level (Leq 16 hr) at Hever Castle with the Project in place would be less than 1dB, which is an imperceptible level of change.</p>
<p>Air noise impacts on Penshurst Place</p>	<p>An assessment has been undertaken regarding the likely impact of air noise changes on designated historic assets such as listed buildings and conservation areas, including Penshurst Place.</p> <p>The assessment was carried out in accordance with the methodology set out in published guidance prepared on behalf of English Heritage (now Historic England). This methodology is identified in the Airports NPS as the appropriate guidance for the assessment of air noise impacts on heritage assets.</p> <p>The methodology is described in section 5.4 of <b>ES Appendix 7.6.1: Historic Environment</b></p>

	<p><b>Baseline Report</b> <a href="#">[APP-101]</a> and the results of the assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>.</p> <p>Historic England has advised in its Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>The methodology requires the establishment of ‘noise change footprints’ within which the predicted changes to the average summer daytime noise level (Leq 16 hr) would exceed 1dB. A negative ‘noise change footprint’ is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be an increase of more than 1dB, whereas a positive ‘noise change footprint’ is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be a decrease of more than 1dB.</p> <p>The predicted changes to the average summer daytime noise level (Leq 16 hr) at Penshurst Place with the Project in place would be less than 1dB, which is an imperceptible level of change.</p>
<p>Air noise on Chiddingstone Castle</p>	<p>An assessment has been undertaken regarding the likely impact of air noise changes on designated historic assets such as listed buildings and conservation areas, including Chiddingstone Castle.</p> <p>The assessment was carried out in accordance with the methodology set out in published guidance prepared on behalf of English Heritage (now Historic England). This methodology is identified in the Airports NPS as the appropriate guidance for the assessment of air noise impacts on heritage assets.</p>

	<p>The methodology is described in section 5.4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a> and the results of the assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>.</p> <p>Historic England has advised in its Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>The methodology requires the establishment of 'noise change footprints' within which the predicted changes to the average summer daytime noise level (Leq 16 hr) would exceed 1dB. A negative 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be an increase of more than 1dB, whereas a positive 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be a decrease of more than 1dB.</p> <p>The predicted changes to the average summer daytime noise level (Leq 16 hr) at Chiddingstone Castle with the Project in place would be less than 1dB, which is an imperceptible level of change.</p>
<p>Air noise on Chartwell Place</p>	<p>An assessment has been undertaken regarding the likely impact of air noise changes on designated historic assets such as listed buildings and conservation areas, including Chartwell Place.</p> <p>The assessment was carried out in accordance with the methodology set out in published guidance that was initially prepared on behalf of English Heritage (now Historic England). This methodology is identified in the Airports NPS as</p>

	<p>the appropriate guidance for the assessment of air noise impacts on heritage assets.</p> <p>The methodology is described in section 5.4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a> and the results of the assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>.</p> <p>Historic England has advised in its Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>The methodology requires the establishment of 'noise change footprints' within which the predicted changes to the average summer daytime noise level (Leq 16 hr) would exceed 1dB. A negative 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be an increase of more than 1dB, whereas a positive 'noise change footprint' is where the predicted change to the average summer daytime noise level (Leq 16 hr) would be a decrease of more than 1dB.</p> <p>The predicted changes to the average summer daytime noise level (Leq 16 hr) at Chartwell Place with the Project in place would be less than 1dB, which is an imperceptible level of change.</p>
<p>Traffic impacts on heritage assets</p>	<p>An assessment has been undertaken regarding the likely impact of road traffic noise changes on designated historic assets such as listed buildings and conservation areas.</p> <p>The results of the assessment are set out in Section 7.9 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> and are based on the</p>

	<p>road traffic noise modelling set out in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>.</p> <p>The predicted changes in road traffic noise are all rated as negligible and would not result in any harmful effect on the significance of any heritage asset.</p>
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#### 4.19 Landscape, Townscape and Visual

4.19.1 Table 4.19.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.19.1 Thematic issues and the Applicant’s response – Landscape, Townscape and Visual**

Summary of issues raised in the RRs	The Applicant’s response
<p>Concern that the noise and visual intrusion due to an increase in overflying aircraft will impact the enjoyment of nationally designated landscapes including Surrey Hills AONB, High Weald AONB, Kent Downs AONB and South Downs National Park. Some respondents claimed that their enjoyment of the AONB is adversely impacted at present due to aircraft noise.</p>	<p>Section 8.9 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> includes a thorough assessment of effects on the perception of tranquillity within nationally designated landscapes as a result of an increase in the number of visible and/or audible overflying aircraft up to 7,000 ft above local ground level. The tranquillity study has been determined through an appropriate methodology (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of <b>ES Landscape, Townscape and Visual Figures</b> <a href="#">[APP-062]</a> together with nationally designated landscapes and 10 popular and well-known locations within them.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity,</p>



	<p>which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived.</p>
<p>Concern that the tranquillity within the countryside will be reduced due to an increase in aircraft flights and an urbanisation of the landscape including light pollution. Some respondents expressed concern that their enjoyment of the registered park and garden at Hever Castle and other attractions will be impacted.</p>	<p>Section 8.9 of <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> describes the impacts on landscape and townscape character and visual amenity during the daytime and at night as a result of an increase in built form and concentration of lighting at the airport within an urban and rural setting and the influence on the perception of tranquillity due to overflying aircraft (to accommodate specific criteria in CAA guidance, CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated in <b>ES Landscape, Townscape and Visual</b> <a href="#">[APP-062]</a> Figures 8.6.3 to 8.6.7 together with nationally designated landscapes and 10 popular and well known locations within them including Hever Castle.</p> <p>The chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting the High Weald National Landscape experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived.</p>

<p>Suggestion for the use of natural screening measures such as trees to mitigate light pollution from the NRP.</p>	<p>Section 8.9 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> describes the influence that a slight intensification of the massing of built form and concentration of lighting visible at night within the predominantly urban townscape of the airport would have within the urban and rural surroundings and the wider setting of the High Weald AONB. The Proposed Development includes phased removal of existing vegetation, where required, and the delivery of proposed landscape mitigation to establish and provide screening benefits at the earliest opportunity to minimise daytime and night time visual effects. These landscaping proposals are set out in <b>ES Appendix 8.8.1: Outline LEMP</b> <a href="#">[APP-113,114,115,116]</a>.</p>
<p>Concern that there will be a loss of community green space due to the expansion of the airport.</p>	<p>The Applicant recognises the importance of amenity green spaces to the community. The design of the surface access improvements has sought to avoid the loss of trees where possible. Publicly accessible replacement open space would be created at what is currently Car Park B and to the north of Longbridge roundabout to compensate for any loss of existing open space, together with new green space on existing farmland east of Museum Field and at Brook Farm, representing a benefit to the local community, Gatwick staff and visitors.</p> <p>Effects on landscape character and visual amenity as a result of vegetation loss generally and within existing green space (Riverside Garden Park/Church Meadows) are assessed during construction and when operational within Section 8.9 and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a>. Landscape proposals are illustrated in <b>ES Appendix 8.8.1: Outline LEMP</b> <a href="#">[APP-113,114,115,116]</a>.</p>

	<p>The <b>Draft DCO</b> [<a href="#">AS-127</a>] includes as requirement 8 in Schedule 2 that the details of landscape planting proposals for each part of the authorised development must be submitted to and approved by the local planning authority prior to that part commencing.</p>
<p>Concern that there will be adverse visual impacts associated with construction of the NRP.</p>	<p>Effects on landscape character and visual amenity as a result of the Project are assessed during construction and when operational within Sections 8.9 and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>]. Significant temporary, adverse effects on visual amenity during construction would be limited to people using public open space in some parts of Riverside Garden Park and Church Meadows, a small number of residents on the edge of Horley and occupiers of the Hilton Hotel.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice (CoCP)</b> [<a href="#">APP-082</a>] and <b>ES Appendix 5.3.1: Buildability Report</b> [<a href="#">APP-079</a>, <a href="#">080</a> and <a href="#">081</a>] set out the general nature of compounds including the key elements they will include. The CoCP describes how the Applicant will manage and minimise disturbance and other environmental impacts from construction activities required to deliver the Project whilst meeting the requirements of relevant legislation, codes of practice and standards. Measures would include the appropriate positioning of infrastructure within the compound, appropriate types, locations and operation of lighting and the type/height of boundary treatments including security fences and screens.</p>
<p>Concern that expansion of the airport will adversely impact the rural character</p>	<p>Section 8.9 and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] describe the impacts on landscape</p>

<p>and villages within the local area.</p>	<p>and townscape character and visual amenity, during the daytime and at night as a result of the NRP. The Proposed Development has been informed by the Environmental Impact Assessment (EIA) process and where possible designed to avoid or reduce adverse effects on valued landscape features such as trees and hedgerows and deliver benefits for character and biodiversity in accordance with policy and best practice through a comprehensive set of landscape proposals. Where possible, development has been located to avoid any adverse influence over the character of the surrounding landscape and rural villages. Where adverse effects cannot be avoided or further reduced, mitigation and compensation proposals have been established in consultation with stakeholders. <b>ES Appendix 8.8.1: Outline LEMP – Part 1</b> <a href="#">[APP-113]</a> sets the overarching vision for landscape proposals and management of green infrastructure of the Project including meadows, woodland, wetland and hedgerows. The obligations within the outline LEMP will be secured through Requirement 8 of the draft DCO, <b>Draft DCO</b> <a href="#">[AS-127]</a>. A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the principles in the outline LEMP.</p>
<p>Concern the scale and height of new structures has not been addressed within the DCO application.</p>	<p>Maximum parameter models have been assessed for all elements within the Project (where necessary) and form an appropriate level of detail required for the application (see Table 8.7.1 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a>). The maximum footprint and height of all key elements of the Project are referred to in Table 8.7.1 and have informed the assessment of effects on landscape, townscape and visual amenity. Wireline photomontages at Figures 8.9.1 to</p>

	<p>8.9.28 illustrate the Project within 32 views towards Gatwick and accurately demonstrate the maximum scale, mass and height of the Project within the existing context of extensive development at the airport and settlements of Crawley and Horley.</p>
<p>Concern that the existing airport has adverse impacts on the landscape. Some respondents expressed concern that low-flying aircraft are unsightly.</p>	<p><b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] describes the baseline situation for landscape/townscape and visual receptors including the presence of Gatwick Airport, low flying aircraft arriving and departing and overflying aircraft within the landscape and within views from surrounding areas. The presence of extensive mature vegetation and earth bunds associated with the River Mole corridor, woodland at Brockley Wood, Horleyland Wood and Upper Pickett’s Wood within the airport and woodland at Riverside Garden Park provides effective green infrastructure and visual screening to conceal the airport and integrate with the surrounding landscape. The majority of this landscape infrastructure will be retained within the Project and will continue to provide landscape integration and visual screening.</p> <p>The Project includes phased removal of existing vegetation, where required predominantly within the A23/M23 Spur corridor, and the delivery of proposed landscape mitigation to establish and provide additional screening benefits at the earliest opportunity to minimise daytime and night time visual effects and to reintegrate the Project into its landscape/townscape setting <b>ES Appendix 8.8.1: Outline LEMP – Part 1</b> [APP-113] sets the overarching vision for landscape proposals and management of green infrastructure of the Project.</p>

The effects on these receptors, during the daytime and at night as a result of a change in the baseline situation through the addition of the NRP and an increase in aircraft arriving at and departing from Gatwick and overflights generally are described within **ES Chapter 8: Landscape, Townscape and Visual Resources** [[APP-033](#)]. Wireline photomontages at Figures 8.9.1 to 8.9.28 illustrate the Project within 32 views towards Gatwick, some of which include visible aircraft arriving at and departing from Gatwick and overflying aircraft generally, and accurately demonstrate the maximum scale, mass and height of the Project within the existing context of extensive development at the airport and settlements of Crawley and Horley. Significant short term adverse effects on visual amenity during construction of the surface access improvements and when complete, but before mitigation planting is established would be limited to people using public open space in some parts of Riverside Garden Park and Church Meadows, a small number of residents on the edge of Horley, occupiers of the Hilton Hotel. Significant adverse short term effects on landscape character would be limited to the Mole Valley Open Weald in the vicinity of Longbridge Roundabout to accommodate the surface access improvements.

An increase of up to 20% in aircraft arriving at and departing from Gatwick would be visible to people within the airport and in surrounding landscapes and townscapes. This change is considered to be discernible although unlikely to result in significant adverse effects.

The chapter concludes that an increase of up to 20% in visible and audible overflights compared to the future baseline situation in 2032 would

	result in Minor adverse effects on perception of tranquillity, which is not significant.
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#### 4.20 Major Accidents and Disasters

4.20.1 Table 4.20.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.20.1 Thematic issues and the Applicant’s response – Major Accident and Disasters**

Summary of issues raised in the RRs	The Applicant’s response
General safety comments	<p>Existing emergency response arrangements at Gatwick Airport will be extended to cover operations on the Northern Runway following implementation of the NRP. The NRP will result in an increase in passenger numbers and total aircraft movements, however, it won’t introduce fundamentally new or “bigger” hazards than those already taken into account in the airport’s emergency planning.</p> <p><b>ES Appendix 5.3.4: Major Accidents and Disasters</b> <a href="#">[APP-089]</a> has addressed the movement of people to and from the airport and gave consideration to associated safety risks. Issues regarding terrorism, cyber and state threats, accidents and system failures, environmental hazards, pandemic threats, societal threats and conflict are also addressed in <b>ES Appendix 5.3.4: Major Accidents and Disasters</b> <a href="#">[APP-089]</a>. No intolerable risks (i.e. those that are difficult to mitigate) or significant effects were identified.</p>
Repurposing of the emergency runway	An emergency or stand-by runway is not a CAA requirement and many other airports do not have one. Should circumstances arise where an aircraft could not use the runway(s) at Gatwick Airport, for whatever reason, it would be diverted to an alternative airport.

Impact on emergency response	The demand for humanitarian support in response to a major incident or disaster would be dependent upon the nature of the specific event. The NRP will result in an increase in passenger numbers and total aircraft movements. However, it won't introduce fundamentally new or "bigger" hazards and thus, within the frequency with which major events occur, would not be expected to result in higher demands and pressures on acute hospitals/local authorities and rest centres.
Airport design and operation	The design and operation of the airport following implementation of the NRP will be fully aligned with CAA safety requirements.
Proximity of the main and northern runways	The analysis presented in <b>ES Appendix 5.3.4: Major Accidents and Disasters</b> [APP-089] has concluded that none of the major accident and disaster scenarios identified for the NRP, with the potential to result in harm to people, have been determined to be in an 'intolerable' risk.

#### 4.21 Need and Forecasting

4.21.1 Table 4.21.1 below summarises the issues raised in the RRs and the Applicant's response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.21.1 Thematic issues and the Applicant's response – Need and Forecasting**

Summary of issues raised in the RRs	The Applicant's response
The NRP is contrary to the ANPS in that no need has been demonstrated for it.	Substantial documentation has been submitted with the DCO application to demonstrate the need for the NRP, notably in the <b>Planning Statement</b> [APP-245] and in the <b>Needs Case</b> [APP-250]. Very few representations engage with the detail of the submitted case or with the demonstrable need to provide more capacity. Gatwick has the world's busiest (daytime) single runway and a documented waiting list from



airlines for more slots. It has a clear need for additional operational capacity and resilience **today** and all forecasts show that need will increase.

The relevant paragraph of the ANPS for these purposes is paragraph 1.42 which provides:

*“As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application’s individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”*

No conflict arises with the ANPS, therefore, from seeking DCO consent for more intensive use of Gatwick Airport – in fact, the ANPS recognises that *“it may well be possible”* to make the case for such growth, although each application will have to go through the relevant process and to be considered on its merits.

The merits of the case for the NRP are set out extensively in the application documents; notably in the **Planning Statement** [\[APP-245\]](#) and the **Needs Case** [\[APP-250\]](#), supported by the **Forecast Data Book** [\[APP-075\]](#). It would not be productive to set the case out again here but there are some specific issues raised in the representations which are responded to here.

**The policy need is met by Heathrow**

It would not be right to suggest that the need which is being addressed in the NRP has been met by the Government's support for a third runway at Heathrow, for a number of reasons.

First, neither the Government nor the Airports Commission ever considered that the need would be satisfied by the third runway. As the **Planning Statement** [APP-245] explains at paragraph 8.2.8, the Airports Commission found:

*“16.40 Irrespective of how the government responds to the recommendations set out in this report a new runway might not open for at least 10 years. It is imperative that the UK continues to grow its domestic and international connectivity in this period....”*

Consequently, paragraph 1.42 of the ANPS (see above) supports in principle more intensive use being made of other airports' infrastructure and the policy document *Beyond the Horizon - The Future of UK Aviation – making best use of existing runways*, June 2018) was published to set out the Government's response to the recommendation by the Airports Commission for other airports besides Heathrow to make more intensive use of their existing infrastructure. Paragraph 1.5 states that the Government agreed with the Airports Commission's recommendation and was minded to be supportive of all airports who wish to make best use of their existing runways, including those in the South East, subject to environmental issues being addressed.

The application of that policy to Gatwick and the NRP is addressed in the **Planning Statement** [APP-245] paragraphs 8.2.9 to 8.2.20.

Government policy makes clear that the Government is “committed to growth” because of the need for and benefits of aviation to the UK.<sup>8</sup>

Second, Gatwick’s case is that the airport needs more capacity for operational purposes (see the **Needs Case** [APP-250] at Section 7) and that the forecast need for growth is strong, whether or not a third runway is built at Heathrow.

Third, it would not be appropriate to assume that a third runway will be promoted, consented, funded and built at Heathrow. Each of those steps remains uncertain. This issue was addressed in the Secretary of State’s decision in 2022 at Manston Airport where some objectors argued that there was no need, because it would be met at Heathrow or through other airport expansion. The **Planning Statement** [APP-245] explains from paragraph 8.2.16 that the Secretary of State concluded at Manston as follows:

*97. .... However, the Secretary of State is of the view that in considering whether there is a demand for the capacity the Development aims to provide, he is not able to attach weight to applications that have yet to come forward. This is because there is no certainty that capacity from such applications will be delivered. For example, aspiration plans setting out future growth may be modified or changed, or they may not come forward at all. Where planning permission is required, both the ANPS and the MBU policies are clear that they do not prejudge the decision of the relevant planning authority responsible for decision-making on any planning applications. Such applications are subject to the relevant planning process and may not ultimately be granted consent by the decision-maker. In addition, the aviation sector in the UK is largely*

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<sup>8</sup> See the policy commentary in the Planning Statement [APP-245], particularly at Section 6.2.

*privatised and operates in a competitive international market, and the decision to invest in airport expansion is therefore a commercial decision to be taken by the airport operator.”*

### **Assuming no third runway**

Representations criticise the fact the Gatwick’s central case assumes there would not be a third runway at Heathrow. The reason for this is explained in the **ES Chapter 6: Approach to Environmental Assessment** [APP-031] at paragraph 6.3.59. A third runway at Heathrow is not sufficiently certain to form a central assumption for the NRP application and, by undertaking an assessment of the likely significant effects of the NRP assuming no third runway, the Environmental Statement assesses the likely worst case effects of Gatwick’s expansion.

Nevertheless, both the Environmental Statement and the Needs Case do consider the implications if a third runway was developed at Heathrow. In particular, the **Needs Case** [APP-250]:

- undertakes a forecasting sensitivity assuming the third runway is operational (see from paragraph 6.6.10);
- explains how Gatwick and Heathrow are operationally and commercially different and complementary to one another (see from paragraph 5.2.53); and
- explains that there are no current plans for the third runway such that, at best, a third runway could not be developed until the mid-2030s at the very earliest, whilst the NRP could be operational from 2029, meeting a pressing short and medium term need that a third runway at Heathrow cannot meet (see from paragraph 5.2.43).

	<p><b>A new runway?</b></p> <p>Representations suggest that the NRP proposes a new runway, with the implication that it is either not necessary or does not have policy support. The scale and nature of its construction is clearly very different from the development of a new runway.</p> <p>The question of whether or not making better use policy (MBU) applies to Gatwick is considered in the <b>Planning Statement</b> [<a href="#">APP-245</a>] at Section 8.2 but it is apparent that both the Aviation Policy Framework and the Airports Commission were concerned with the importance of increasing aviation capacity and that there is nothing to suggest that this would not embrace making innovative use or alterations to existing standby runways.</p> <p>Similarly, the policy position as set out in <i>Flight Path to the Future</i> is straightforward: “<i>It is also essential that we utilise existing airport capacity in a way that delivers for the UK, putting the needs of users first and supporting our aims to enhance global connectivity. A competitive, modern, and efficient sector for the future, that makes the best use of capacity will be delivered through recognising where changes may be needed and taking steps to address them.</i>” (Page 18).</p>
<p>There is no need to expand Gatwick because it does not meet the need identified by the Airports Commission or the ANPS for hub connectivity.</p>	<p>The question of the need for the NRP is addressed above.</p> <p>There is no precondition that it operates as a hub airport in order to meet the need identified by the Airports Commission, because the Commission concluded that there was a need both for a new full scale runway in the South East and to make the best use of other airport infrastructure.</p>

	<p>The case for the NRP does not seek to supplant the need for a third runway at Heathrow.</p>
<p>The need is not in the South-East (i.e. not additional to Heathrow). Levelling up suggests the need to expand, for example, in Manchester.</p>	<p>In 2019 181 million passengers used the London airports, this represented 60% of total UK airport activity. This share has been relatively stable, having increased slightly from 57% before the Global Financial Crisis, GFC (2007).</p> <p>The fact that the London airports account for such high throughput reflects the weight of demand for aviation in London and the wider South East. Of the ~160 million passengers arriving or departing the LON airports (i.e., excluding transfers) it is estimated that 77m<sup>9</sup> originated or terminated their journey in London.</p> <p>A further 59 million originated in the East and South East regions, catchments which naturally favour the London airports given their geographic proximity and transport links.</p> <p>The strong aviation market being served by the London airports reflects the concentration of population, relative wealth, strong trade links, diverse population and strong inbound tourism demand, amongst other factors.</p> <p>GAL forecasts that London will continue to account for the majority of UK aviation demand. The outlook for population, GDP and inbound tourism continue to favour London and the South East. Whilst some redistribution between airports may be anticipated it will not detract from the importance of demand at the London airports.</p> <p>It is the London airports that lack capacity as demonstrated by the severe constraints at Heathrow and Gatwick. Slots are oversubscribed with airlines either unable to operate or forced to</p>

<sup>9</sup> Combination of CAA Survey and annual Airport Reports

	<p>operate at sub optimal timings. Many airlines have resorted to the secondary slot market at Gatwick, having to pay millions of pounds for just one daily slot pair<sup>10</sup>. Whilst this is the case for Heathrow and Gatwick, airports such as Manchester and Birmingham still have significant unused capacity and operate well within their current runway capabilities. For example, Manchester airport has two runways handling just 29m passengers and Birmingham has one runway handling 13m passengers in 2019. Compared to Gatwick’s throughput with just one runway (46.6mppa handled) these airports have significant spare capacity.</p> <p>Recent forecasts by the DfT<sup>11</sup> show continuing capacity at Manchester and at Birmingham (~100k today); but both these airports are operating well below their capacity limits.</p> <p>Owing to their geographical location and the smaller route networks of the non-London airports (compared with Heathrow and Gatwick), they are inherently less attractive, and it is unrealistic to expect demand to readily re-deploy from the South East to more northerly airports. HS2 is unlikely to change the position significantly. Its principal effect, if any, will be to increase the accessibility of the South East airports to the population in the rest of the country.</p>
<p>Any decision is premature to, for example, further policy on climate change, government’s revised aviation forecasts or the development of carbon neutral aviation fuel.</p>	<p>There is no government or other policy in place to suggest that decisions on airport capacity should be held up, rather than determined now. In fact, the need to increase airport capacity in the South East is long standing and overdue.</p> <p>The Government established the Airports Commission in 2012 in view of intractable</p>

<sup>10</sup> One daily slot pair represents one arrival and one departure throughout the year. In these cases, one airline will trade their slots to another.

<sup>11</sup> Jet Zero dataset (<https://www.gov.uk/government/consultations/achieving-net-zero-aviation-by-2050>)

difficulties that had been experienced since the war in developing new capacity. The Commission's Final Report identified that:

*"While London remains a well-connected city its airports are showing unambiguous signs of strain. Heathrow is operating at capacity, and Gatwick is quickly approaching the same point."*<sup>12</sup>

The Commission identified the need for a new full scale runway, to be operational by 2030. An increase in capacity, particularly in the South East is well overdue. The Government agrees. As the ANPS explains at paragraph 2.11:

*"The UK **now** faces a significant capacity challenge. Heathrow Airport is currently the busiest two-runway airport in the world, while Gatwick Airport is the busiest single runway airport in the world. London's airports are filling up fast and will all be full by the mid-2030s if we do not **take action now.**"* (emphasis added)

Planning policy is strongly supportive in principle of securing growth in capacity now.

Gatwick has an oversubscription of demand now and an everyday need for the capacity and resilience inherent in a second operational runway now.

Representations suggest that a decision at Gatwick should await the publication of new aviation forecasts. However, the application is informed by government forecasts published as recently as July 2023 as part of the Government's publication Jet Zero Strategy - one year on. Whilst those forecasts indicate the potential for a slow down in the pace of growth in the 2040s, substantial growth is forecast in the 2020s and

<sup>12</sup> <https://assets.publishing.service.gov.uk/media/5a808ab4e5274a2e8ab50bd4/airports-commission-final-report.pdf> Executive Summary, page 3.



2030s to add to the current oversubscription of demand. The NRP represents the only realistic opportunity to make a significant contribution to that demand and growth before the mid to late 2030s.

The published forecasts take full account of climate change policy and the price of carbon.

Other representations suggest that approving the application for the NRP would be premature either to more work being undertaken by the Committee for Climate Change or premature to the development of technologies for sustainable aviation fuels or other forms of low emission flight.

The report of the Climate Change Committee, June 2023 did recommend that “No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects.”<sup>13</sup>

However, the Government’s Response in October 2023 confirmed that: <sup>14</sup>

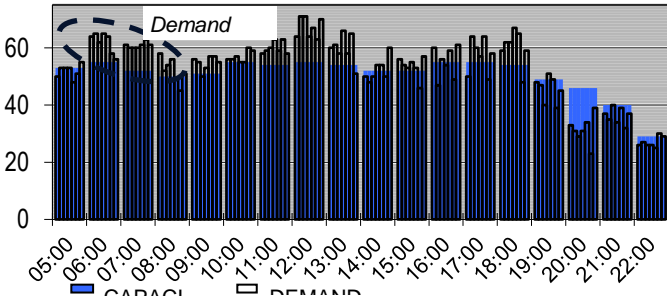
*“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022.*

*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*

<sup>13</sup> <https://www.theccc.org.uk/wp-content/uploads/2023/06/Progress-in-reducing-UK-emissions-2023-Report-to-Parliament-1.pdf>

<sup>14</sup> <https://assets.publishing.service.gov.uk/media/65393f4ae6c968000daa9b0e/ccc-annual-progress-report-2023-government-response.pdf>

	<p><i>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>Consistent with its commitment to monitor aviation’s carbon trajectory and to intervene if necessary, therefore, the Government does not accept a need to intervene (or defer) decisions on airport capacity.</p>
<p>Better use should be made of existing slots – e.g. at shoulder periods and quieter periods in the day. If it was, there would be no need for expansion.</p>	<p>The runway is already the busiest day time runway in the world.</p> <ul style="list-style-type: none"> <li>- The airport is operating at 100% of maximum capacity during the core summer months.</li> <li>- The airport is over-subscribed today, the following chart highlights how requests from airlines for capacity already go unmet today.</li> </ul> <p>Whilst Gatwick is able to operate at up to 55 movements per hour in several hours of the day, the airport is unable to do so for extended periods as breaks need to be built into the schedule to support resilience and reflect the traffic mix.</p> <p>Gatwick Airport, Slot Allocation, Summer 2024 (ATMs)</p>

	 <p>Source: ACL</p>
<p>Growth forecasts are out of date and should be reduced to take account of reduced business travel, Zoom calls, the increased cost of carbon, and a reduced tendency for young people to fly.</p>	<p>The latest demand forecasts prepared by the Government have been used for the basis of the latest demand projections when considering the need case. These were prepared in early 2023 when the market recovery was already well underway. They were updated to include the latest assumption regarding economic growth, airline costs and future carbon costs/emissions<sup>15</sup>. Those forecasts are discussed in the submitted <b>Needs Case</b> [APP-250] from paragraph 5.2.16.</p> <p>Whilst the business travel market remains below 2019 levels, and will for several years, some segments e.g. leisure have bounced back and are already exceeding 2019 levels. Demand has also been restricted by operational challenges being experienced by airlines and the wider industry.</p> <p>Over the long-term demand is forecast to grow reflecting economic growth, growing trade links, increasing leisure demand (holidays/visiting friends &amp; relatives (VFR)). For example, the latest Government forecast (Jet Zero 2023) forecasts that demand for aviation in the UK will grow by &gt;100 million passengers by 2040 and &gt;140 million passengers by 2050.</p>

<sup>15</sup> <https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on>

	<p>In response to requests from the host local authorities, as part of the Statement of Common Ground discussions, Gatwick has brought these matters together in at Chapter 3 and Chapter 6 of the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6).</p> <p>There is no documented reduced tendency for young people to fly. Looking at the data*, there are two general themes. Since 2010 the 'young people' (defined as 20-44) are:</p> <ul style="list-style-type: none"> <li>- <b>Travelling more:</b> In the 2010-19 period, passengers in this age category increased by 73% (+60% for UK residents, +100% for inbound passengers)</li> <li>- <b>Becoming more important:</b> In the 2010-19 period passengers in this age category increased modestly from 50.5% to 50.7% of total passengers. In 2022 their share had increased further to 51.8%.</li> </ul> <p><i>*Source: CAA Survey for LHR, LGW, STN, LTN, MAN, &amp; BHX airports</i></p>
<p><b>Heathrow's third runway meets the market need.</b></p>	<p>A third runway at Heathrow is not certain to come forward and is not currently being promoted and has accordingly not been reflected in Gatwick's core cases of the Base and Northern Runway scenarios.</p> <p>Even if Heathrow were expanded it is unlikely to be able to deliver capacity until the late 2030s. This is many years after Gatwick's anticipated commencement of dual runway operations pursuant to the NRP Application (2029). Gatwick would have provided benefits for airlines, passengers and the economy for many years before LHR could open. If Heathrow does expand it would cater for a different type of demand. User charges would be anticipated to rise due to the high costs of the project and inhibit</p>

	<p>many market segments. Low cost carriers will account for the majority of traffic growth in the future, and the greater costs of operating at Heathrow would limit their ability to operate at Heathrow (the airport charges and operational efficiency challenges are addressed in Section 3 of the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6).</p> <p>In contrast, Gatwick will provide expansion earlier, at lower cost and serve all market segments as it does successfully today.</p>
<p>Gatwick is not well located to meet the need.</p>	<p><b>London &amp; South East Demand</b></p> <p>In 2019 demand for travel to/from Greater London itself accounted for 77m passengers, or just under half of the London airports' demand. The South East of England is the second largest contributor to aviation demand generating a further 40m passengers in 2019. The London airports also attract demand from across the UK with regions such as the South Cost and Midlands also contributing significant passenger volumes.</p> <p><b>Gatwick's Position</b></p> <p>London Gatwick is located in the heart of the most prosperous, densely populated and best-connected region of the UK with more than 17m people within 90 minutes of Gatwick. It has a significant passenger catchment area which produces more than 40m passenger journeys a year.</p> <p>The airport also benefits from a significant share of the inner London catchment thanks to its excellent rail access into Central London. Unlike other London airports, there are fast and convenient connections every 3 minutes, arriving into London Victoria and London Bridge in under</p>

	<p>28 minutes. In addition to the excellent connections into central London, Gatwick also offers connections down to Brighton and to Cambridge and Leeds, among others.</p> <p>More detail is discussed in in the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6) in Chapter 1 (page 15) and Chapter 6 (pages 46-47).</p>
<p>If all airport expansion proposals were approved, it would exceed the forecast need and be inconsistent with Making Best Use.</p>	<p>Whilst the Government will monitor aviation’s carbon trajectory and exercise a range of market mechanisms to make sure the Government’s carbon commitments are met, it has made clear that it currently sees no need to intervene to stop the development of airport capacity. There is no policy to cap or limit airport expansion proposals. Policies are supportive of airport growth given the importance of aviation and connectivity.</p> <p>Carbon and aviation policies are not incompatible. Securing increases in airport capacity has proven to be notably difficult in recent decades and the UK has a long standing, chronic shortage of capacity. The Government’s policy publications (such as <i>Flightpath to the Future, 2022</i>) make clear that the Government is committed to support growth in principle because of the important benefits that it brings:</p> <p><i>“It is also essential that we utilise existing airport capacity in a way that delivers for the UK, putting the needs of users first and supporting our aims to enhance global connectivity. A competitive, modern, and efficient sector for the future, that makes the best use of capacity will be delivered through recognising where changes may be needed and taking steps to address them.”</i> (<i>Flightpath to the Future</i> page 18).</p> <p>These are benefits, not just to the UK economy but also to choice, competition, international</p>

connectivity and passenger experience. These are the same benefits which the ANPS makes clear at paragraphs 2.11 to 2.14 are important objectives.

Aviation's carbon emissions can be regulated by various means and the industry understands that it needs to change radically to play its part. Nothing can be achieved, however, if there is insufficient airport capacity and investment. The Secretary of State's decision on proposals for new cargo capacity at Manston Airport made clear that:

*"The aviation sector in the UK is largely privatised and operates in a competitive international market and, as set out in paragraph 8 of the Executive Summary (of the APF) Government continues to welcome significant levels of private investment in airport infrastructure. The APF recognises that maintaining the UK's international connectivity is a complex and contentious one, but solving it is crucial to securing the UK's long-term economic growth (Aviation Policy Framework Executive Summary, paragraph 24)."*

It is for government policy to regulate capacity if it considers it appropriate. It is apparent, however, that government has modelled the impact of airport expansion to test its alignment with government's carbon objectives. The outcome is made clear in the Government's response to consultation published with its Jet Zero Strategy, as follows:

*"3.1 Whilst we did not consult on any direct demand management measures through either the Jet Zero consultation or further technical consultation, this theme was raised regularly by respondents to every question posed."*

*3.2 The aviation sector is important for the whole of the UK economy in terms of connectivity, direct economic activity, trade, investment and jobs. Before COVID-19, it facilitated £95.2 billion of UK's non-EU trade exports; contributed at least £22 billion directly to GDP; and directly provided at least 230,000 jobs across all regions of the country.*

*3.3 The Government remains committed to growth in the aviation sector where it is justified and to working with industry to ensure a sustainable recovery from the pandemic. Our analysis set out in the Jet Zero Strategy shows that the aviation sector can achieve Jet Zero without government needing to intervene directly to limit aviation growth, with scenarios that can achieve our net zero targets by focusing on new fuels and technology, with knock-on economic and social benefits, without limiting demand. Our 'high ambition' scenario has residual emissions of 19.3 MtCO<sub>2</sub>e in 2050, compared to 23 MtCO<sub>2</sub>e residual emissions in the CCC's Balanced Pathway. We recognise that to achieve this trajectory we will need to see significant investment in, and uptake of, new technologies and operational processes and government is committed to working with the sector to ensure we achieve our aims.*

*3.4 Furthermore, airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. The Government is, and remains, supportive of airport expansion where it can be delivered within our environmental obligations. Our existing policy frameworks for airport planning - the ANPS and MBU - provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider*



*restrictions on airport growth to be a necessary measure.”<sup>16</sup>*

The Jet Zero modelling, of course, postdates any modelling undertaken in 2018 for the publication of the Government’s Making Better Use (MBU) policy in *Beyond the Horizon*. However, the Government has been clear that there was never intended to be any limitation implied by that modelling. At Manston Airport, objectors argued that the expansion there could not be consented because Manston was not included in the modelling which sat behind MBU. However, the Secretary of State made clear in his decision letter:

*“71. Regarding the forecasts underpinning the MBU policy, the Secretary of State does not agree that an operational Manston Airport would be unforeseen growth because it was not specifically listed in these forecasts. The Secretary of State would point out that neither of the relevant aviation planning policies (the ANPS and the MBU policy) restricts growth at airports beyond Government’s preferred Heathrow Northwest Runway option to only those listed in the forecasts or those not listed but captured by the ranges used in forecasting as is the case for smaller airports.”*

Gatwick’s NRP proposals have been specifically taken into account by the Government in the modelling done to support the Jet Zero Strategy. In its background document ‘Jet Zero Modelling Framework’ (March 2022), the DfT set out its capacity assumptions for the UK’s airports (in Annex D). The capacity assumptions are said to take account of both the third runway at Heathrow

<sup>16</sup> Jet Zero consultation: summary of responses and government response July 2022. Available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1091862/jet-zero-consultationsummary-of-responses-and-government-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091862/jet-zero-consultationsummary-of-responses-and-government-response.pdf)

	<p>and policies to make the best use of other airports (MBU).<sup>17</sup></p> <p><i>“3.18 In June 2018, the government set out its policy support for airports to make best use of their existing runways in Beyond the Horizon: The future of UK aviation: making best use of existing runways (“MBU”) and a new runway at Heathrow Airport in the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (ANPS), subject to related economic and environmental considerations. In common with the Jet Zero Consultation the capacity assumptions in our modelling reflect and are aligned with these policies.</i></p> <p>The modelling shows the full capacity of the NRP at 386,000 ATMs (Annex D of the Jet Zero Modelling Framework).</p>
<p>There is sufficient spare capacity at Stansted, Luton and London City.</p>	<p>There is insufficient capacity across the London airports to serve future demand needs, London’s primary airports (Heathrow and Gatwick) have been operating at their capacity limits for several years.</p> <p><b>Capacity</b></p> <p>London benefits from six airports serving the largest aviation market in the world, however most of its major airports are already capacity constrained.</p> <p><u>Capacity Today:</u></p> <ul style="list-style-type: none"> <li>- <b>Heathrow</b> benefits from two runways but has been operating at its planning limit of 480k annual aircraft movements for over 10 years.</li> </ul>

<sup>17</sup> Jet Zero: Modelling Framework, Annex D. March 2022. available at <https://assets.publishing.service.gov.uk/media/62384b518fa8f540f3202bd4/jet-zero-modelling-framework.pdf>

- **Gatwick** has been constrained for several years with no runway capacity available during the core hours of the day in the peak summer months.
- **Luton** reached its planning limit of 18 million passengers in 2019. A modest increase to 19 million passengers has recently been permitted.
- **Stansted** recently had its planning limit raised from 35 to 43 million passengers. It is also relatively distant from the central London and Southeast aviation market.
- **London City** served just 5 million passengers in 2019 equivalent to <3% of the London aviation market. It serves a small subset of demand focused on regional jets flying business-oriented routes during weekdays.
- **Southend** served just 2 million passengers in 2019.

Future Capacity:

Gatwick's Northern Runway would deliver capacity by the early 2030s whilst other projects (Luton & Heathrow expansion) are unlikely to deliver significant additional capacity before the late 2030s at the earliest (if at all).

Luton is proposing a similar growth to Gatwick compared to their current cap (+13m, from 19m to 32 million passenger planning cap), Stansted has had its planning cap increased by 10 million recently whilst London City is only proposing a very modest increase and only serves a very specific market segment.

Gatwick is the only airport to provide capacity suitable for all airline business models (e.g. Low Cost Carriers) and demand segments (e.g. Long haul, short haul, regional). For example, today

	<p>Luton/Stansted/London City have very limited long-haul operations / capability.</p> <p>Gatwick’s ability to provide capacity and suitability is discussed in the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6), Chapter 3, pages 20-22.</p> <p><b><u>Demand</u></b></p> <p>London’s aviation demand has grown significantly over the last couple of decades. Some 50 million passengers were added across the London airports in the decade leading up to 2019. With volumes returning to pre-Covid levels further demand growth is forecast. Latest Government forecasts (Jet Zero, 2023) show a further 140+ million passengers being expected to travel across the UK’s airports by 2050.</p> <p>London will continue to account for the majority of growth reflecting its strong and growing catchment as well as its links to faster growing aviation markets.</p> <p>Other airports (Stansted, Luton, London City) will not be able to handle certain market segments and the capacity will not be enough to accommodate the demand being forecast.</p>
<p><b>Gatwick is just a holiday airport, which does not justify expansion.</b></p>	<p>Compared to other airports, Gatwick supports the widest mix of airlines and market segments across the London aviation market. It successfully caters to full-service carriers, low-cost carriers, charter airlines, regional carriers as well as a wide range of markets including long haul.</p> <p>By far the largest travel segment is the leisure market which accounted for 81% of demand across all the UK’s airports (pre Covid reference). Gatwick is representative of the wider market as it</p>

	<p>had an 85% share of leisure passengers according to CAA survey statistics.</p> <p>The traffic mix of the London/UK market is discussed in Section 5 of the <b>Needs Case Technical Appendix</b> (Doc Ref. 10.6) and Section 9.4 of the <b>Forecast Data Book</b> [<a href="#">APP-075</a>].</p> <p>Other airports like London City and Heathrow operate with lower shares of leisure travellers, whilst there are many other airports that operate with higher shares of leisure travellers when compared to Gatwick.</p> <p>Gatwick also supports the inbound market, in 2019 foreign residents accounted for 28% of total terminating passengers which is again comparable to the UK average of 30%. Airports such as Manchester, Birmingham and others operate with much lower shares being more reliant on UK outbound leisure travellers.</p>
Support	<p>GAL has noted and is grateful for the significant level of support from interested parties and the recognition that Gatwick needs to be able to expand to add resilience, operational flexibility and passenger benefits but also to continue to grow the contribution which it makes to the national and local economy.</p>

## 4.22 Noise and Vibration

4.22.1 Table 4.22.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.22.1 Thematic issues and the Applicant’s response – Noise and Vibration**

<b>Summary of issues raised in the RRs</b>	<b>The Applicant’s response</b>
Concern about the current impact of noise from the	The impact of aircraft noise from the Project during the day and at night has been fully

airport, including night flights.

assessed and all realistic and practicable mitigation measures have been considered. The assessment includes a detailed quantification of noise levels in the current and future baseline and in the future with the Project. In some areas the Project is likely to increase aircraft noise and in some, to the south, it is likely to reduce them slightly. The mitigation measures set out in **ES Chapter 14: Noise and Vibration** [\[APP-039\]](#) cover all areas, so as to limit and where possible reduce, the total adverse impacts on health and quality of life from aviation noise in connection with the Project.

The assessment assumes the extant Night Restrictions imposed by the DfT through the Civil Aviation Act 1982 will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work, as currently is the case. As a result, the total number of people affected by noise at night between 2300 and 0600 with the Project will be less than in the 2019 baseline (due to the future baseline otherwise providing quieter conditions due to fleet modernisation).

A new noise insulation scheme will be launched to ensure that significant effects on health and quality of life at night from aviation noise are avoided. Many interested parties have noted the need to keep windows closed to avoid sleep disturbance and the problems associated with doing this in the warmer summer. The new noise insulation scheme will offer acoustic ventilators to approximately 4,300 homes, to allow residents to

	<p>close their windows with ventilation if they choose. See <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a>.</p>
<p>Concern about the impact of future increases in levels of noise as a result of the Proposed Development.</p>	<p>The impact of increases in aircraft noise from the Project have been fully assessed and all realistic and practicable mitigation measures have been considered. Details are provided <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Details are provided <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>.</p> <p>Many interested parties note that aircraft noise bothers them most in the summer, when aircraft numbers are greatest. The assessment of aircraft noise focuses on an average summer day in order to assess the season on highest noise in accordance with CAA guidance (CAP1616). During the year of greatest noise impact (2032) the Project is forecast to add 19% to the summer season air traffic during the 16 hour day period from 0700 to 2300. The greatest increase at night is forecast to be 10% in the noisiest year (2032). No new flight paths are required in connection with the Project, so the noise impacts are largely as a result of more aircraft in the same locations.</p> <p>Mitigation measures to limit and where possible reduce all sources of noise are described in Sections 14.8 and 14.9 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> and include:</p> <ul style="list-style-type: none"> <li>• Measures within <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> to manage noise and vibration activities from construction activities.</li> <li>• Noise barriers on the new flyovers to be built at the North and South Terminal roundabouts.</li> </ul>

	<ul style="list-style-type: none"> <li>• A new right turn at the North Terminal to remove the current need for traffic wishing to turn right instead having to turn left up to the Longbridge Roundabout, round it, and back down the A23 thus reducing traffic flows on this section (past Riverside Garden Park)</li> <li>• A reduced speed limit from 50 to 40mph on the A23 London Road.</li> <li>• Earthworks, bunding at least 8 metres in height situated at the western end of northern runway and noise barriers 10 metres in height adjoining the bund running to the north of the relocated Juliet taxiway and around the boundary of the relocated fire training ground (as shown at <b>Figure 5.2.1g ES Project Description [APP-053]</b>).</li> <li>• Acoustic design of plant and fixed noise sources on buildings to meet the stated noise criteria see <b>ES Appendix 14.9.3: Ground Noise Modelling [APP-173]</b>.</li> <li>• Avoiding use of the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work, as currently is the case.</li> <li>• Differential charges for aircraft with higher noise levels to help incentivise quieter aircraft.</li> <li>• The continuation of various operating procedures including departure noise limits, as governed by the DfT in accordance with noise regulation under the Civil Aviation Act 1982.</li> <li>• The continuation of the Night Restrictions, operating restrictions, as governed by the DfT in accordance with noise regulation under the Civil Aviation Act 1982.</li> <li>• A Noise Envelope, to legally limit noise during the day (0700-2300) and night (2300-0700) (see <b>ES Appendix 14.9.7:</b></li> </ul>
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**The Noise Envelope** [\[APP-177\]](#) as enforced through the Development Consent Order (see sections 15 and 16 of the **Draft DCO** [\[AS-127\]](#)).

- A substantially improved noise insulation scheme, with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for up to approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme see **ES Appendix 14.9.10: Noise Insulation Scheme** [\[APP-180\]](#).

The assessment in **ES Chapter 14: Noise and Vibration** [\[APP-039\]](#) in summary concludes as follows.

### **Construction**

- The 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. Various non-residential properties and open spaces could also be affected and mitigation for these has been included where necessary.
- For night-time construction, the assessment identified approximately ten residential properties where noise levels could be above SOAEL and noise insulation could be required to avoid significant adverse effects to those.

### **Air Noise during operation**

- Air noise has been assessed for a single forecast of aircraft numbers in each of 5 assessment years, for a Central Case fleet and a Slower Transition Case fleet reflecting uncertainty in the rate at which the fleet will transition to quieter aircraft types in the future.
- All the properties at which adverse significant effects are predicted (approximately 80 properties, 210 people) are within this NIS Inner Zone so would be eligible for a full package of noise insulation. At these properties increases in daytime noise levels of greater than Leq 16 hour 1 dB (see Figure 14.9.5) are expected above SOAEL. Noise insulation would avoid noise impacts indoors, including sleep disturbance and disturbance to noise sensitive activities during the day such as working, reading etc, and is consistent with policy for the first aim of the NPSE to avoid significant effects on health and quality of life. Noise insulation would not reduce noise levels outside, so some disturbance in outside activities is likely for properties with outside space, such as gardens or balconies, and significant moderate adverse effects are expected in this area.
- Approximately 5,100 to 6,900 people are expected to experience noise increases in Leq 16 hr day of 1-3 dB below SOAEL and minor adverse effects that are not considered significant. The majority of these would be offered noise insulation within the NIS outer zone which would help to reduce noise levels indoors and reduce these noise impacts.
- Significant adverse effects on health and quality of life at night will be avoided by the provision of noise insulation.

**Ground Noise**

- There are 20 properties, 2 in the Charlwood receptor area, 8 on Charlwood Road, and 10 in the Lowfield Heath receptor area, where the effects before mitigation are rated as major above SOAEL. For these the NIS inner zone insulation package would avoid noise impacts indoors, including sleep disturbance and disturbance to noise sensitive activities during the day such as working, reading etc. Noise insulation would not reduce noise levels outside and so some disturbance in outside activities is likely which is expected to result in moderate adverse significant effects in these areas.
- Up to 17 properties in the Povey Cross and Rowley Farm receptor areas are expected to experience moderate adverse significant effects due to increases in ground noise below SOAEL. These would be offered noise insulation within the NIS outer zone which would help to reduce noise levels indoors and reduce these noise impacts.
- In total, although noise insulation will mitigate the effects, residual significant moderate adverse effects are predicted at 37 properties.

**Fixed Plant during operation**

- No significant effects from fixed plant noise are predicted.

	<p><b><u>Road Traffic during Operation</u></b></p> <ul style="list-style-type: none"> <li>No significant effects from increases in road traffic noise are predicted either in the vicinity of the highways scheme or on the wider road network.</li> </ul>
<p>Concern about the impact of increased noise on health and well-being, with some respondents concerned about the detrimental impact of noise on quality of sleep.</p>	<p>An assessment of the impact on health and communities has been undertaken and reported in <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> of the ES. This assessment uses the results of the Noise and Vibration assessment to identify health and community effects. In summary the assessment concludes that whilst any increase in aviation (both air noise and ground noise) and surface access noise may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health in EIA Regulation terms.</p> <p>The assessment of health and wellbeing effects from changes in noise exposure includes a physiological sleep disturbance assessment that has been undertaken to estimate the number of additional awakenings that would be produced by the Project. <b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a> provides details. An ‘awakening’ is defined as a move from deep Stage 4 or REM sleep to Stage 1 or awake. It is important to note that as we sleep, we change sleep stage numerous times and ‘awaken’ for all manner of reasons, e.g. temperature, humidity, light levels, and internal reasons such as sleep disorders, health conditions, bad dreams etc. Whether or not noise will disturb sleep also depends on situational effects, or moderators, e.g. depth of sleep phase, background noise level, and individual factors (e.g. noise sensitivity). A healthy adult briefly awakens about 20 times during an eight hour night and most of</p>

	<p>these awakenings are too short to be remembered the next morning.</p> <p>A key finding of that assessment is that even in the worst-case year for noise impacts (2032), there would be less than one additional awakening per summer night per person as a result of the Project in the area where the additional flights are closest to populations.</p> <p>The author of the systematic review underpinning the WHO guidelines on noise notes that: <i>‘On average, there should be less than one additional awakening induced by aircraft noise’</i> (Basner, et al., 2006) (p. 2780).</p> <p>They also note that: <i>‘It is not deemed necessary from a medical point of view to completely avoid additional awakenings induced by aircraft noise. It is rather assumed impacts of aircraft noise on health can be excluded in areas where less than one additional awakening is expected to be induced by aircraft noise on average’.</i></p>
<p>Concern about the impact of noise on habitats or wildlife, or on the tranquility of areas such as AONB or heritage assets.</p>	<p>Modelling of aircraft overflight densities and how these will change as a result of the Project up to 35 miles the airport has been undertaken and is presented in Section 12 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. The impact of noise (amongst other factors) on tranquillity for landscape receptors, including with AONBs is assessed in <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a>. The impact of noise (amongst other factors) on the setting and tranquillity of heritage receptors is assessed in <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>. Likely significant effects of noise and vibration on protected species are assessed and presented in <b>ES Chapter 7: Ecology and Nature Conservation</b> <a href="#">[APP-032]</a>.</p>

	<p>The outcomes of these assessments are summarised in detail in the chapters referenced above, and in summary form in the <b>ES Non-Technical Summary</b> [<a href="#">APP-165</a>].</p>
<p>Concern that local schools will be exposed to increased levels of noise.</p>	<p>The impact of increases of aircraft noise from the Project on schools has been fully assessed in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. Noise changes at 21 schools have been modelled and assessed. Small increases (&lt;2dB) or decreases are predicted in all case and significant effects are not expected. However, the Project includes a Schools Insulation Scheme which is described and secured within <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [<a href="#">APP-180</a>], for all schools with noise sensitive teaching spaces within the forecast 2032 Leq 16 hr 51 dB noise contour.</p> <p>Where schools are concerned that aircraft noise could be affecting teaching, each classroom area will be surveyed to assess the effects of all types of noise including local road traffic. Noise insulation measures could include improved glazing and acoustic fresh air ventilation and GAL will work with the schools to deliver a suitable noise insulation package if found to be required.</p>
<p>Consider the noise assessment to be inaccurate or incorrect.</p>	<p>The impact of noise and vibration from the Project has been fully assessed and all realistic and practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by Noise Topic Working Group (comprising local authorities and the technical</p>

	advisors) throughout preparation of the Environmental Statement.
<p>Concern that the aircraft routes will change and create additional noise impacts.</p>	<p>Section 4 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> explains the Project does not require the routings of aircraft to or from the airport to be changed, but rather increases the numbers of flights on existing routes.</p> <p>Only departures would routinely use the northern runway (other than during maintenance of the main runway when arrivals and departures may use it as is the case now). Departures from the northern runway would fly straight ahead until they diverge to turn onto the relevant Standard Instrument Departure (SID) Route within the Noise Preferential Route generally 5 to 16 km from the end of the runway. These flight paths would be 210 metres north of the equivalent flight paths from the main runway.</p> <p>Given the close proximity between the existing and proposed runway centrelines, and the fact that the existing northern runway is already in regular (if limited) use, any noise impacts of the Project would be in areas already overflown by aircraft from Gatwick.</p> <p>FASI-S is not required (nor is any other airspace change) to enable dual runway operations at Gatwick. When the likely outcome of the FASI-South airspace is known then the noise impacts of that change will be assessed as part of that process. Further details of FASI-South and the approach are set out in <b>ES Chapter 6: Approach to Environmental Assessment</b> <a href="#">[APP-031]</a>.</p>
<p>Concern that proposed noise mitigation is inadequate or will be ineffective.</p>	<p>The noise and vibration impact of the Project has been fully assessed and all realistic and practicable mitigation measures have been considered. Mitigation measures to reduce noise are described in Sections 14.8 and 14.9 of <b>ES</b></p>

**Chapter 14: Noise and Vibration** [[APP-039](#)] and include:

- Measures within **ES Appendix 5.3.2: Code of Construction Practice** [[APP-082](#)] to manage noise and vibration activities from construction activities.
- Noise barriers on the new flyovers to be built at the North and South Terminal roundabouts.
- A new right turn at the North Terminal to remove the current need for traffic wishing to turn right instead having to turn left up to the Longbridge Roundabout, round it, and back down the A23 thus reducing traffic flows on this section (past Riverside Garden Park)
- A reduced speed limit from 50 to 40mph on the A23 London Road.
- Earthworks, bunding at least 8 metres in height situated at the western end of northern runway and noise barriers 10 metres in height adjoining the bund running to the north of the relocated Juliet taxiway and around the boundary of the relocated fire training ground (as shown at **Figure 5.2.1g ES: Project Description Figures** [[APP-053](#)]).
- Acoustic design of plant and fixed noise sources on buildings to meet the stated noise criteria see **ES Appendix 14.9.3: Ground Noise Modelling** [[APP-173](#)].
- Avoiding use of the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case.
- Differential charges for aircraft with higher noise levels to help incentivise quieter aircraft.
- The continuation of a various operating procedures including departure noise



	<p>limits, as governed by the DfT in accordance with noise regulation under the Civil Aviation Act 1982.</p> <ul style="list-style-type: none"> <li>• The continuation of the Night Restrictions, operating restrictions, as governed by the DfT in accordance with noise regulation under the Civil Aviation Act 1982.</li> <li>• A Noise Envelope, to legally limit noise during the day (0700-2300) and night (2300-0700) (see <b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a> as enforced through the Development Consent Order (see sections 15 and 16 of the <b>Draft DCO</b> <a href="#">[AS-127f]</a>).</li> <li>• A substantially improved noise insulation scheme with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme see <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a>. This scheme exceeds policy requirements and will be in line with UK best practice.</li> </ul> <p>These mitigation measures form the basis of the noise impacts reported in the ES, consistent with government and other policy requirements as discussed as in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>, and will be enforced through the means summarised in the <b>ES Appendix 5.2.3: Mitigation Route Map</b> <a href="#">[APP-078]</a>.</p>
<p>Concern that the noise insulation scheme will not be effective.</p>	<p>Some Interested Parties comment that the existing noise insulation scheme is not fully effective for them. The current scheme was reviewed in 2019 and the findings of that review have been fully considered in developing the new scheme that accompanies the Project. The proposed scheme, described in <b>ES Appendix</b></p>

	<p><b>14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a>, includes enlarging the area covered from around 2,000 homes to 4,300 homes, a more comprehensive package on insulation, higher sums of money offered across the range of noise levels encountered, and ventilation to allow windows to be kept closed in summer.</p> <p>Local Authorities have asked for further details of the scheme including how it will be implemented, and GAL is working with the Noise Topic Working Group to provide this.</p>
<p>Concerns over cumulative effects of noise from other airports.</p>	<p>The cumulative noise and vibration effects of the Project are assessed in the Section 14.11 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. ES Chapter 14 reports as assessment of the increase in overflights from the Project that includes a quantification of the baseline level of overflights from all airports up to 35 miles from Gatwick. Due to uncertainty around the third runway at London Heathrow Airport (Heathrow R3), this development has not been included in the main cumulative effects assessment. However, as Heathrow R3 remains Government policy, it has been considered separately and a qualitative assessment is provided in <b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> <a href="#">[APP-045]</a>.</p>
<p>Concern that the enhanced noise insulation scheme proposed by GAL is not comparable to what is considered current industry best practice, such as that proposed for Luton Airport's current expansion proposals.</p>	<p>The development of the Noise Insulation Scheme considered not only a review of the current Gatwick scheme but also consideration of schemes at other airports. The two noise zones proposed are based on the same noise levels as proposed in the current Luton airport development proposal with similar noise insulation packages being offered.</p>

<p>A view that the assessment of sleep awakenings undertaken by GAL does not take account of the approach adopted by other recent UK airport applications nor does it include all relevant noise sources, leading it to incorrect conclusions.</p>	<p>The methodology used to assess sleep disturbance through a physiological sleep disturbance assessment to estimate the number of additional awakenings, as described in <b>ES Appendix 14.9.2: Air Noise Modelling</b> [<a href="#">APP-172</a>], was suggested by the UK Health Security Agency in their comments on the PEIR (see para 7.1.1 of this appendix).</p>
<p>Concern that the lack of true compensation is a major issue and does not reach out to areas significantly impacted by noise currently, or take on board the fact that many homes are listed.</p>	<p>With regards air noise mitigation measures to reduce noise are described in Sections 14.8 and 14.9 of <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] and include:</p> <ul style="list-style-type: none"> <li>• Avoiding use of the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case.</li> <li>• Differential charges for aircraft with higher noise levels to help incentivise quieter aircraft.</li> <li>• The continuation of various operating procedures including departure noise limits, as governed by the DfT.</li> <li>• The continuation of the Night Restrictions, operating restrictions, as governed by the DfT.</li> <li>• A Noise Envelope, to legally limit noise during the day (0700-2300) and night (2300-0700) (see <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>] as enforced through the Development Consent Order (see sections 15 and 16 of the <b>Draft DCO</b> [<a href="#">AS-127</a>]).</li> <li>• A substantially improved noise insulation scheme with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for</li> </ul>

	<p>approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme see <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [<a href="#">APP-180</a>].</p> <p>The Noise Insulation Scheme Outer Zone exceeds policy guidance on the noise levels at which insulation should be offered. The noise insulation package to be offered to home in the Inner Zone meets the policy requirement to avoid significant adverse effects on health and quality of life.</p> <p>Approximately 5% of the homes within the outer and inner noise insulation zones are listed buildings. <i>Energy Efficiency and Historic Buildings, Secondary Glazing for Windows, Historic England, 2016</i> gives guidance on forms of secondary glazing best suited to Listed Buildings. GAL is providing further details as to how the Noise Insulation scheme will be administered, and in particular how the scheme will differ in respect of listed buildings taking into account their statutory protections.</p>
<p>Concern that Gatwick’s noise assessment is limited to people within the government’s lowest observable adverse effect level (LOAEL) contours. This materially understates the impact of the proposal on communities.</p>	<p>The impact of noise and vibration from the Project has been fully assessed and all realistic and practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>]. The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by Noise Topic Working Group (comprising local authorities and the technical advisors) throughout the preparation of the Environmental Statement. The CAA’s guidance on noise assessment (CAP1616) requires noise</p>

	<p>levels above LOAEL to be modelled and assessed. It also suggests supplementary noise metrics such as N60, N65 and Lmax can be used. The ES has used these noise metrics in the assessment to further illustrate noise changes from the Project.</p> <p>Below LOAEL the CAA suggest the numbers of overflights should be used to illustrate change. The ES provides the results of modelling overflights to a distance 35 miles from the airport.</p>
<p>Concern over use of Leq for the Noise Envelope</p>	<p>The use of Leq 16 hour day and Leq 8 hour night for the noise limits within the Noise Envelope was discussed in detail within the Noise Envelope Group consultation in Summer 2022. <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> p134 to 159 give the presentation made by GAL on 23 June 2023. Page 148 summarises the timeline of a study GAL carried out in 2028 with the Noise Management Board Community Noise Groups seeking their views on noise metrics and reviewing the options available.</p> <p>The options considered for the noise envelope and the reasons why the two metrics, Leq 16 hour day and Leq 8 hour night, where chosen are reported in Section 2 of <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> <a href="#">[APP-175]</a>.</p>
<p>Concern that the Noise Envelope does not follow government policy requiring sharing of the benefits of noise reduction.</p>	<p>Sharing the benefits was discussed in various Noise Envelope Group (NEG) meetings. GAL presented its estimates of sharing the benefits to the NEG on 23 June 2022, see <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a> p164 to 175, using the methodology referred to in the Bristol Airport Planning Appeal Decision, Appeal Ref: APP/D0121/W/20/3259234, 2 February 2022. GAL noted that the policy gives no method for</p>

	<p>assessing the degree of sharing nor the extent that should be shared, and the planning inspector for the Bristol case approved the scheme as consistent with noise policy, whilst noting that 77% of this potential noise benefit was to be taken by ATM growth.</p>
<p>Concern there are no restrictions on noise in the winter.</p>	<p>An annual cap of 386,000 commercial Air Transport Movements is included in the DCO that covers the winter as well as the summer period, when noise effects are at their greatest because the airport is at its busiest. With this annual ATM cap in place together with all other relevant noise mitigations, and taking into account the summer season peak for air traffic, it is not necessary for there to be any further restrictions to limit noise emissions from air traffic in the winter season</p>
<p>Views that do not support the regulation 598 noise objective Gatwick has proposed because it selectively omits key elements of government policy. It should be amended to refer to and reflect all relevant government policy.</p>	<p>The noise objective for the Noise Envelope, see <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> [<a href="#">APP-175</a>], was first published in the PEIR in Autumn 2021.</p> <p>The noise objective for the Project is that the Project will:</p> <ul style="list-style-type: none"> <li>• Avoid significant adverse impacts on health and quality of life from noise;</li> <li>• Mitigate and minimise adverse impacts on health and quality of life from noise;</li> <li>• Where possible, contribute to improvements to health and quality of life; and</li> <li>• provide certainty to the communities around Gatwick that noise will not exceed contour limits and will reduce over time, consistent with the ICAO Balanced Approach.</li> </ul> <p>It uses the three aims of the Noise Policy Statement for England, and the objectives of a</p>

	<p>noise envelope, summarising them necessarily briefly. It is considered to be appropriate and proportionate.</p>
<p>Concern that noise would be so great, they would prefer GAL to buy their home</p>	<p>The Home Relocation Assistance scheme, see <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [APP-180], provides home owners most affected by the highest levels of noise from the Project (within the Leq 16 hr 66 dB standard mode noise) a package to assist them in moving. Our noise forecasts indicate about 100 homes in this noise zone in the noisiest year. Approximately 75 of these homes have already (2019) been above this noise level and we expect only a small number of homeowners to take up this offer.</p>
<p>Concern that the noise envelope was not developed following CAA guidance and with sufficient community input.</p>	<p>A summary of consultation undertaken in developing the Noise Envelope is provided in Section 4 of <b>ES Appendix 14.9.7: The Noise Envelope</b> [APP-177]. This includes a summary of consultee comments on GAL’s outline of the Noise Envelope published in the Preliminary Environmental Information Report (PEIR) in September 2021.</p> <p>The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [AS-023] explains that a total of 12 two-hour meetings dedicated to the Noise Envelope development were held between 26 May and 11 October 2022 between the airport and local authority, community and industry stakeholders. This appendix also included the bulk of the material presented and discussed in those meetings and exchanged through correspondence in between including:</p>

	<ul style="list-style-type: none"> <li>• Appendix 1 – Noise Envelope Engagement Process Terms of Reference P8-11</li> <li>• Appendix 2 – Gatwick Airport Noise Envelope Group Meetings Dates and Attendees P12-15</li> <li>• Appendix 3 – Meeting Notes P16-91</li> <li>• Appendix 4 – Themed Presentations and papers P92-231</li> <li>• Appendix 5 – Stakeholder presentations and papers P232-296</li> <li>• Appendix 6– Stakeholder Feedback Correspondence and GAL Responses P297-378.</li> </ul> <p>It is strongly refuted that the noise envelope was not developed following CAA Guidance and with sufficient community input.</p>
<p>Consider the noise envelope to be an ineffective method of mitigating against the impact of noise.</p>	<p>A Noise Envelope is a requirement of government policy and has been developed in accordance with that policy as summarised in <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>].</p> <p>In September 2021 the Preliminary Environmental Information Report (PEIR) outlined the Noise Envelope proposal for the northern runway Project. The concept has been developed considerably since then, taking account of extensive stakeholder input, to form the fully implementable and enforceable set of noise limits and procedures described in the <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>]. The background to the Noise Envelope is described in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> [<a href="#">APP-175</a>] which explains some of the options considered and the choices made.</p> <p>Gatwick airport already has a well-developed and comprehensive noise management system summarised in Section 3 of <b>ES Appendix 14.9.2: Air Noise Modelling</b> [<a href="#">APP-172</a>] which is</p>



monitored and enforced through a number of processes, including the 2022 Section 106 Agreement with the local authorities, the Noise Action Plan through Defra and the Environmental Noise (England) Regulations 2006, and Operating Procedures and Operating Restrictions (including the Night Restrictions) enforced by the Department for Transport in accordance with the Civil Aviation Act 1982. It is not the purpose of the Noise Envelope to replicate these or prescribe particular actions to reduce noise, but rather to set the overall noise limits that must be achieved to ensure noise is limited and reduces, and the processes to ensure these are legally enforceable. The Noise Envelope must provide confidence and certainty about the extent of noise for the local community. This is what the proposed Noise Envelope provides. It provides limits on overall noise levels during the day and the night, enforceable through the Development Consent Order and processes outlines therein (see sections 15 and 16 of the **Draft DCO** [\[AS-127\]](#)).

The Night Restrictions limit numbers of aircraft and total noise quotas in the 6.5 hour period 2330 to 0600. The Noise Envelope noise contour area limits apply to the 8 hour night period 2300 to 0700 and the 16 hour daytime period 0700 to 2300 hours, and so for the first time place limits of community noise exposure across the whole 24 hour period. The enforceability of these limits through the DCO, if granted, gives certainty that these limits will not be exceeded so that aircraft noise will be limited and will reduce during the second noise envelope period as required by government policy.

The noise envelope will also be effective because of its forward-looking nature, requiring five yearly future forecasts to be carried out annually, and

	<p>which will be able to be reconciled against performance year on year. This will not only ensure that any potential breaches are identified and addressed at the earliest opportunity but will also ensure there is confidence in the airports operating practices, again providing certainty. Moreover, we have included restrictions on capacity declarations in the event of a future identified breach, or two breaches of the same limit during the previous 24 months of the operation of the airport. Taking into account that there will always be forward- and backward-looking reporting and that those will be cognizant of one another, this will ensure that any exceedances are not able to go unchecked and unaddressed.</p>
<p>Concern over noise impacts during construction.</p>	<p>Noise impacts have been predicted based on assumed standard methods of working and that the Best Practicable Means to reduce noise on site are adopted, with the use of Section 61 applications through which the Contractor applies to the local authority for prior consent to carry out the works stating all the measures that will be implemented to minimise noise disturbance. Overall, with mitigation the assessment results indicate that there is potential for significant adverse noise effects at approximately 37 properties during the day and approximately 10 during the night in the Longbridge Road, Riverside Park area nearest the required highways works. See <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> for further information.</p> <p>The <b>Code of Construction Practice</b> <a href="#">[APP-082]</a> sets out measures to minimise noise and vibration from construction activities, including the requirement for contractors to use quieter machinery and equipment and construction methods which are not inherently noisy. The CoCP also requires, if all other noise control</p>

	<p>measures on site are not sufficient, noise insulation to be offered where noise levels exceed defined criteria at the SOAEL to avoid residents being significantly affected by levels of construction noise inside their dwellings.</p> <p>No properties are identified in the assessment to require temporary re-housing.</p> <p>The potential for impacts arising from construction traffic have been assessed as not significant.</p>
<p>Concern over the impact of construction noise on users of the Holiday Inn Hotel near Longbridge Roundabout</p>	<p>The impacts of noise during construction have been modelled at hotels and other non-residential properties around the proposed works areas and is reported in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> for each of the 12 the assessment areas shown in ES Figure 14.4.2. GAL is continuing to engage with the Holiday Inn to fully understand the noise insulation performance of the building, the specific areas of concern and to provide additional information to establish if particular noise mitigation and monitoring will be necessary.</p>
<p>Concern over the impact of noise on users of the Raddison Hotel, Church Road, Lowfield Heath</p>	<p>The impacts of noise have been modelled at hotels and noise-sensitive non-residential properties and is reported in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>. Within assessment area 9, Lowfield Heath, impacts from noise during construction and operation at St Michael and All Saints Church next to the Radisson Hotel are reported. GAL will continue to engage with the Radisson Hotel to fully understand the noise insulation performance of the building, the specific areas of concern and to provide additional information to establish if particular noise mitigation and monitoring will be necessary.</p>
<p>Concern over ground noise impacts.</p>	<p>The impact of increases in ground noise from the Project have been fully assessed and all realistic</p>

and practicable mitigation measures have been considered. Details are provided in **ES Chapter 14: Noise and Vibration** [\[APP-039\]](#), **ES Appendix 14.9.3: Ground Noise Modelling** [\[APP-173\]](#) and **ES Appendix 14.9.6: Ground Noise Baseline Report** [\[APP-176\]](#).

Mitigation measures to reduce ground noise are described in Sections 14.8 and 14.9 of **ES Chapter 14: Noise and Vibration** [\[APP-039\]](#) and include:

- Earthworks bunding at least 8 metres in height situated at the western end of northern runway and noise barriers 10 metres in height adjoining the bund running to the north of the relocated Juliet taxiway and around the boundary of the relocated fire training ground (as shown at **Figure 5.2.1g** [\[APP-053\]](#)).
- Acoustic design of plant and fixed noise sources on buildings to meet the stated noise criteria see **ES Appendix 14.9.3: Ground Noise Modelling** [\[APP-173\]](#).
- Avoiding use of the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case.
- Differential charges for aircraft with higher noise levels to help incentivise quieter aircraft.
- A limit on the number of ground engine runs, to be secured by the draft DCO Section 106 Agreement.
- A substantially improved noise insulation scheme with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme

	<p>see <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [<a href="#">APP-180</a>].</p> <p>There are 20 properties, 2 in the Charlwood receptor area, 8 on Charlwood Road, and 10 in the Lowfield Heath receptor area, where the effects before mitigation are rated as major above SOAEL. For these the NIS inner zone insulation package would avoid noise impacts indoors, including sleep disturbance and disturbance to noise sensitive activities during the day such as working, reading etc. Noise insulation would not reduce noise levels outside and so some disturbance in outside activities is likely which is expected to result in moderate adverse significant effects in these areas.</p> <p>Up to 17 properties in the Povey Cross and Rowley Farm receptor areas are expected to experience moderate adverse significant effects due to increases in ground noise below SOAEL. These would be offered noise insulation within the NIS outer zone which would help to reduce noise levels indoors and reduce these noise impacts.</p> <p>In total, although noise insulation will mitigate the effects, residual significant moderate adverse effects as a result of ground noise are predicted at 37 properties.</p> <p>No significant effects from fixed plant noise are predicted.</p>
<p>Concern over road traffic noise impacts from the Project.</p>	<p>The impact of increases in road traffic noise from the Project have been fully assessed and all realistic and practicable mitigation measures have been considered. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> [<a href="#">APP-039</a>] and <b>ES Appendix 14.9.4: Road Traffic Noise Modelling</b> [<a href="#">APP-174</a>]. The assessment</p>

	<p>considered traffic noise changes during the peak periods of construction, and in the opening year of the highway scheme, 2032 and 5 years later in 2047. Noise levels were modelled as a result of the new highways changes in the area immediately around the highway works and also on the wider road network covered by the transport assessment.</p> <p>Mitigation measures to reduce road traffic noise are described in Sections 14.8 and 14.9 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> and include:</p> <ul style="list-style-type: none"> <li>• Noise barriers on the new flyovers to be built at the North and South Terminal roundabouts.</li> <li>• A new right turn at the North Terminal to remove the current need for traffic wishing to turn right instead having to turn left up to the Longbridge Roundabout, round it, and back down the A23 thus reducing traffic flows on this section (past Riverside Garden Park)</li> <li>• A reduced speed limit from 50 to 40mph on the A23 London Road.</li> </ul> <p>The assessment in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> concludes that with this mitigation no significant effects from increases in road traffic noise are predicted either in the vicinity of the highways scheme or on the wider road network, either during construction or operation.</p>
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#### 4.23 Other

4.23.1 Table 4.23.1 below summarises the issues raised in the RRs and the Applicant's response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.23.1 Thematic issues and the Applicant’s response – Other**

Summary of issues raised in the RRs	The Applicant’s response
<p>The proposals will place additional cost burdens on Local Authorities to provide supporting infrastructure which in turn will result in taxpayer funds going towards NRP. Local Authorities should receive compensation to cover such costs.</p>	<p>No taxpayer money would be used to finance the Project. The Applicant will be responsible for funding required supporting infrastructure where that is necessary to mitigate any significant effects.</p> <p>The Applicant has proposed to secure, through a Section 106 Agreement, a Sustainable Transport Fund to support the delivery of the Surface Access Commitments and uptake of sustainable travel modes to achieve mode share commitments and a Transport Mitigation Fund which can be used to address any unforeseen impacts on the local transport networks.</p> <p>Overall, the airport brings very significant positive economic benefit to the local area.</p>
<p>The proposal’s negative impacts on the environment outweigh the positive impacts.</p>	<p>The Project’s impacts on the environment have been assessed within the Environmental Statement.</p> <p>The positive and negative impacts of the Project have been considered within the <b>Planning Statement</b> [APP-245]. Section 9 of the Planning Statement provides the Applicant’s view of the planning balance, weighing the impacts against national planning policies.</p> <p>Where significant adverse impacts have been identified, mitigation and controls have been identified to avoid, reduce and, if possible, offset those significant impacts – these are summarised in <b>ES Appendix 5.2.3: Mitigation Route Map</b> [APP-078]. This mitigation will be legally secured by clear and enforceable controls to ensure they</p>

	<p>are adhered to throughout the construction and operation of the Project.</p> <p>Taking into account the proposed controls and mitigation, it is the Applicant's view that the Project would generate substantial benefits that outweigh the adverse impacts identified within the application, and that the application strongly accords with national planning policies.</p>
<p>Infrastructure in the local area does not have capacity to support an expansion at Gatwick Airport.</p>	<p>The DCO application has considered the impact of the Project on infrastructure in the local area through the Environmental Statement.</p> <p>For example, the Applicant has undertaken modelling to understand the impact of the Project on the water environment including water infrastructure within and outside of Gatwick Airport. The Applicant has included in its proposals water management works to mitigate flood risk and improve foul water and potable water capacity. Further details of the proposed water management works and the assessment on water infrastructure is set out in <b>Chapter 5: Project Description</b> <a href="#">[AS-133]</a> and <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a>.</p> <p>The Applicant is proposing surface access improvements as part of the Project to ensure there is sufficient capacity on the highway network. Improvements to active travel facilities are also proposed as part of the application. Further details of the transport infrastructure proposed is set out in <b>ES Chapter 5: Project Description</b> <a href="#">[AS-133]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a>.</p> <p>The impacts on social infrastructure (including housing) are presented in <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> and <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a>.</p>



<p>The NRP places an unfair burden on local residents and will have harmful effects on the local area and impact quality of life.</p>	<p>The mitigation strategies presented as part of the DCO application look to directly prevent, reduce and where relevant, offset any potential significant adverse effects that are specific to the Project– these are summarised in <b>ES Appendix 5.2.3: Mitigation Route Map [APP-078]</b>. These would operate in addition to existing measures that control the airport’s operations to ensure that they do not cause harmful effects.</p> <p>Overall, the airport generates significant net benefits for the local area.</p>
<p>Concern that house prices will decrease as a result of expansion.</p>	<p>The Applicant recognises that the Project could give rise to effects on property prices (both negative and positive). In respect of any loss in value of property, Part 1 of The Land Compensation Act 1973 (LCA) makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects – noise, smoke, fumes etc.– of the use of development works such as an airport expansion. Therefore, if there were to be negative effects on property prices that would qualify for the LCA, it would apply and provide for payment of compensation to cover any loss in value.</p>
<p>The existing airport and surrounding environment (e.g. unkempt verges, potholes, fencing and buildings) should be improved before further expansion.</p>	<p>The local roads are managed and maintained by the local highway authority, rather than the Applicant.</p>
<p>The aviation industry does not pay enough tax which results in reduced tax revenue for government.</p>	<p>Taxation legislation and policy is decided upon and implemented by Government and are not for the Applicant to comment on.</p> <p>Activities on the Gatwick campus directly generated £1.08 billion in taxes for the UK’s</p>

	<p>public finances in 2019. The largest share of this contribution is raised through Air Passenger Duty.</p> <p>A description of the tax contributions from the Applicant, its employees and businesses trading at Gatwick Airport are detailed in Section 8.4 of the <b>Needs Case</b> [<a href="#">APP-250</a>].</p> <p>The Project will be privately funded by GAL as set out in the <b>Funding Statement</b> [<a href="#">APP-009</a>].</p>
<p>Interest in measures that the Applicant is proposing to become more sustainable, including within its supply chain.</p>	<p>The <b>Sustainability Statement</b> [<a href="#">APP-249</a>] demonstrates how the core sustainability principles have been considered throughout the design of the Project and to show how these would be further embedded throughout its construction and lifecycle.</p> <p><b>ES Appendix 5.4.2: Carbon Action Plan</b> [<a href="#">APP-091</a>] includes commitments to work with the supply chain to maximise the reuse of assets and materials and deliver low carbon workshops.</p>
<p>The Project does not adequately demonstrate how the benefits of the expansion will be shared between the aviation industry and local communities, and instead the Project will only benefit Gatwick Airport's shareholders.</p>	<p>The economic and performance benefits of the Project are assessed in Sections 7 and 8 of the <b>Needs Case</b> [<a href="#">APP-250</a>]. This includes the contribution that the Project will make to the local economy and communities, and includes consideration of benefits that cannot be monetised.</p> <p>By the time the runway is fully operational, it will create a net increase in employment of 14,000 jobs and create an extra £1 billion in gross value added (GVA) in the local area.</p>
<p>Concern regarding the appointment of Gatwick CEO as co-chair of the Aviation Council and</p>	<p>The Aviation Council is a government and industry body set up to support the delivery and implementation of the commitments set out in the <i>Flightpath to the Future</i> strategy<sup>18</sup>. Its</p>

<sup>18</sup> Department for Transport (2022) *Flightpath to the Future*.  
<https://assets.publishing.service.gov.uk/media/628f7d26e90e07039f799ebc/flightpath-to-the-future.pdf>

<p>whether this creates a conflict of interest.</p>	<p>membership includes CEOs from a range of other UK airports and carriers.</p> <p>The Aviation Council does not author policy or discuss planning applications.</p>
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#### 4.24 Planning and Policy

4.24.1 Table 4.24.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.24.1 Thematic issues and the Applicant’s response – Planning and Policy**

<p><b>Summary of issues raised in the RRs</b></p>	<p><b>The Applicant’s response</b></p>
<p>Gatwick Airport’s expansion is against government policy set out in the Airports National Policy Statement and Aviation Strategy, which is based on a third runway at Heathrow Airport.</p>	<p>The application of planning policy for the Project is set out in the <b>Planning Statement</b> [APP-245]. Most notably, Section 8.2 of the <b>Planning Statement</b> explains that, whilst the Airports National Policy Statement (ANPS) sets out the policy considerations for a full new runway at Heathrow Airport, it states at paragraph 1.42 that <i>“the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”</i></p> <p>Government policy directly encourages the creation of additional capacity by making best use of other airport infrastructure. A full Aviation Strategy is still to be published by Government but the Aviation 2050 (2018) consultation reaffirms that the Government continues to be supportive of sustainable airport growth.</p> <p>As such, no conflict arises between the ANPS and the NRP, or the policy documents supporting the forthcoming Aviation Strategy.</p>

<p>The description of the works is misleading in that the Project should not be described as using the existing emergency runway because instead a new runway is proposed. Gatwick Airport does not currently have two runways that it can operate concurrently and therefore the Applicant has misinterpreted policy, namely the Government's Aviation Strategy.</p>	<p>There are two existing runways at Gatwick Airport, as described in <b>ES Chapter 4: Existing Site and Operations</b> [APP-029]. The existing northern runway is used when the main runway is closed, such as in an emergency.</p> <p>The works entailed as part of the Project proposals are described in detail in <b>ES Chapter 5: Project Description</b> [AS-133]. The Project does not entail the construction of a new runway or complete re-building of the northern runway, which representations have suggested.</p> <p>As explained in <b>ES Chapter 5:</b></p> <ul style="list-style-type: none"> <li>• The existing northern runway is approximately 2.6km in length and 45m wide;</li> <li>• The existing northern runway is proposed to be repositioned 12m north (measured from the centreline), to have the same width and length as the existing runway.</li> <li>• The repositioned northern runway will therefore comprise a 33m width of the existing (and retained) runway and 12m width of new runway.</li> </ul> <p>Section 8.2 of the <b>Planning Statement</b> [APP-245] sets out the relevance of the Government policy of making best use of existing airport infrastructure.</p>
<p>In principle objection to the Project, any airport expansion and/or new airport expansion in the south-east in the context of 'Levelling Up'.</p>	<p>Substantial material has been submitted as part of the DCO Application to demonstrate the need for the Project, most notably within the <b>Planning Statement</b> [APP-245], the <b>Needs Case</b> [APP-250] and its Planning Statement <b>Appendix 1: National Economic Impact Assessment</b> [APP-251] and Planning Statement Appendix 2: The Economic Impact of Gatwick Airport [APP-252]</p>

	<p>and supported by <b>ES Appendix 4.3.1: Forecast Data Book</b> [<a href="#">APP-075</a>].</p> <p>In respect of ‘Levelling Up’, as set out the Levelling Up the United Kingdom White Paper published by the Department for Levelling Up, Housing and Communities (2022), it is the London airports which lack capacity as demonstrated by the severe constraints at Heathrow and Gatwick airports. The Project does not conflict with the Levelling Up agenda, most notably the Levelling Up White Paper recognises the major rail improvements being made at Gatwick Airport to reduce journey times as part of the Government’s action to level up the south east.</p>
<p>Support for the Project in that it is considered to be in line with Government policy.</p>	<p>Noted. The Applicant welcomes support for the Project.</p>
<p>The Project should be considered through the ‘correct’ planning process with a public inquiry, and not a DCO.</p>	<p>For projects that constitute a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, the Applicant must apply to the Planning Inspectorate for a Development Consent Order (DCO). This is instead of applying for planning permission from the local authority.</p> <p>As explained in the <b>Planning Statement</b> [<a href="#">APP-245</a>], the NRP is classed as a NSIP in that it comprises “airport-related development” and “highway-related development” under Section 14 of the Planning Act 2008.</p> <p>The DCO process involves a 6-month examination process, entailing written submissions at defined deadlines and a series of public hearings. The draft list and dates of the deadlines and hearings for the NRP are set out in the Examining Authority’s (ExA) <b>Rule 6 Letter</b> [<a href="#">PD-009</a>] and which will be confirmed through the ExA’s Rule 8 Letter published shortly after the</p>

	<p>close of the Preliminary Meeting (to take place on 27<sup>th</sup> February 2023).</p> <p>The Planning Inspectorate has published a helpful advice note (Advice Note Eight<sup>19</sup>) which explains what a NSIP is and the DCO planning process in further detail, with an accompanying annex on the examination process (Advice Note 8.4<sup>20</sup>) and public hearings (Advice Note 8.5<sup>21</sup>).</p>
<p>The DCO Application will not be determined through an independent, unbiased, evidenced based process.</p>	<p>All DCO applications are examined by the Examining Authority (ExA), appointed by the Secretary of State relevant to the NSIP being considered. After the close of the 6-month examination period, the ExA must prepare a report including a recommendation on whether to grant or refuse development consent. The report is provided to the Secretary of State, who in turn has a further 3 months to make the decision to grant or refuse development consent.</p>
<p>Land to the south of the airport identified for an additional runway should be released.</p>	<p>This application relates to the NRP, entailing making best use of Gatwick Airport’s existing (emergency) runway.</p> <p>As set out in the <b>Planning Statement [APP-245]</b>, any decisions in respect of an additional runway to the south of the airport, would be a matter for government policy. As such, it is not a matter pertinent to the NRP or the determination of this DCO Application.</p> <p>In any event, the construction of any new runway would be subject to its own DCO application, and which would be consulted upon, assessed and</p>

<sup>19</sup> <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-eight-overview-of-the-nationally-significant-infrastructure-planning-process-for-members-of-the-public-and-others/>

<sup>20</sup> <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-8-4-the-examination/>

<sup>21</sup> <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-8-5-the-examination-hearings-and-site-inspections/>

	<p>examined through its own rigorous planning process.</p>
<p>Object to a large scale development on the edge of Green Belt land in East Surrey.</p>	<p>The Project is largely confined to the existing boundaries of Gatwick Airport and does not include large-scale development within the Green Belt.</p> <p>The existing planning designations within and adjacent to the Project Site boundary are shown on the <b>Planning Policy Plan</b>, contained in the <b>Planning Statement Appendix B: Planning Policy Plan</b> <a href="#">[APP-247]</a>.</p>
<p>Concerns regarding the relationship between the DCO timetable vs. the CBC Local Plan Examination.</p>	<p>The Examination in Public of the Crawley Borough Local Plan 2024-2040 is currently underway and Gatwick Airport Limited is engaged in the process. Similarly, Crawley Borough Council is engaged in the DCO Application process.</p> <p>Whilst the Applicant, and other parties, can make representations to the examination timetable, the examination timetables are set by the respective responsible parties in that they are two separate processes and have two separate timelines. However, in setting the timetable for the Local Plan Examination, the Inspectors were mindful of the DCO timeline to avoid any significant overlap with key events or deadlines<sup>22</sup>.</p> <p>In any event, the NRP is not a matter to be determined through the Local Plan process.</p>

#### 4.25 Socio-Economics and Economics

4.25.1 Table 4.25.1 below summarises the issues raised in the RRs and the Applicant's response to those issues, including locations within the Application Documents where further information can be found.

<sup>22</sup> Paragraph 14 of the Crawley Borough Local Plan 2024-2040 Examination Guidance Notes for Participants (9 October 2023)

**Table 4.25.1 Thematic issues and the Applicant’s response – Socio-Economics and Economics**

Summary of issues raised in the RRs	The Applicant’s response
<p>Support for the local employment opportunities, tourism benefits, enhancement in capacity and connections and economic growth that will be generated by the NRP.</p>	<p>Support is noted</p>
<p>Concern that new employment opportunities generated by the NRP will be for low-skilled roles that offer little job security. Some respondents are of the view that low-skilled roles will be replaced by automation.</p>	<p>NRP will generate a range of employment opportunities from entry level jobs (e.g. cargo handling) to highly skilled engineering and advanced service sector jobs (e.g. air traffic control). There will inevitably be productivity gains over the coming decades and the estimated job numbers reflect those forecast productivity gains including those from automation.</p>
<p>Concern that increased employment opportunities and tourism will put pressure on housing, road, transport, water and social infrastructure including local schools, medical centres.</p>	<p><b>ES Chapter 17: Socio-Economics</b> <a href="#">[APP-042]</a> provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services). <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> deals specifically with impacts on housing.</p> <p>Transport impacts are assessed in <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> and in application document <b>7.4 Transport Assessment</b> <a href="#">[APP-258]</a>.</p>
<p>There is a lack of housing, especially affordable housing in the local area for employees that would enable workers to use</p>	<p>An assessment of the potential demand for housing has been included in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> and an assessment of potential impacts on affordable housing is in Section 7. This concludes that there is sufficient</p>



<p>active travel measures to commute to work.</p>	<p>housing and labour market growth planned to accommodate increased demand for workers. Active travel measures are incorporated into the surface transport improvement works. Section 5.2 of the <b>ES Chapter 5: Project Description</b> [<a href="#">AS-133</a>] summarises the active travel proposals for the Project. These proposals are illustrated in Figure 12.6.2 as part of the <b>ES Traffic and Transport Figures</b> [<a href="#">APP-037</a>], and <b>Surface Access Highways Plans - General Arrangements - For Approval</b> [<a href="#">APP-020</a>].</p>
<p>The economic benefits for the NRP have been prepared using outdated data and have been overstated.</p>	<p>All assessments draw on data for 2019 because that is a robust baseline year because it is the last one not to be affected by Covid-19.</p> <p>The assessment of national impacts follows DfT's TAG (at the time of submission) 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, the application uses 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>Not all costs of the scheme have been adequately considered (non-greenhouse gas emissions, tourism outflows, inequality).</p>	<p>The assessment of national impacts follows DfT's TAG (at the time of submission) 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</p>

	<p>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). In line with TAG (at the time of submission), the appraisal includes a qualitative assessment of non-CO2 emissions. There is also a section dealing with outbound tourism in Section 6.8 of <b>Needs Case Appendix 1: National Economic Impact Assessment</b> [<a href="#">APP-251</a>].</p>
<p>Concerns about the increase in greenhouse gas emissions, the worsening of noise, air and light pollution, and the impact on local wildlife and plant life. Some respondents have mentioned that the NRP will affect their mental and physical wellbeing.</p>	<p>The increase in emissions from a range of sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed.</p> <p>The impact of these changes has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of the <b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>]. Specifically this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>Health and wellbeing are assessed in <b>ES Chapter 18: Health and Wellbeing</b> [<a href="#">APP-043</a>] which concludes that there are no significant adverse health effects.</p> <p>The impact of aircraft noise from the Project during the day and at night has been fully assessed and all reasonably practicable mitigation measures have been considered. The</p>

	<p>assessment includes a detailed quantification of noise levels in the current and future baseline as well as in the future with the Project. In some areas the Project will increase aircraft noise and in some, to the south, it will reduce them slightly. The mitigation measures cover both areas. Details are provided in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>.</p>
<p>The NRP will adversely impact employment, house prices and economic growth in the local area. Economic growth will be limited to the owners of the airport rather than residents.</p>	<p>The economic cost-benefit analysis shows that the scheme's benefits significantly outweigh its costs (including environmental and carbon costs) with a Net Present Value (NPV) of around £21bn. In addition, there would be significant non-monetised benefits, including employment and trade-related effects.</p> <p>The NRP will directly increase local employment and economic activity. This is set out in Section 6 of <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>.</p>
<p>Inability to attract sufficient local labour leading to limited benefits in the affected area</p>	<p><b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> sets out the labour market context. This shows that there will be sufficient local labour.</p> <p>Gatwick has recruited extensively from its local area and there is no reason to think that will not continue. The share of the local workforce due to the NRP is forecast to remain the same as it is currently.</p> <p>In particular, the measures in <b>ES Appendix 17.9.1: Employment Skills and Business Strategy</b> <a href="#">[APP-198]</a> will help maximise opportunities for local business (and their workers) and local residents to access supply chain and employment opportunities during both the construction and operational phases.</p>

## 4.26 Traffic and Transport

4.26.1 Table 4.26.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.26.1 Thematic issues and the Applicant’s response – Traffic and Transport**

Summary of issues raised in the RRs	The Applicant’s response
<p>The existing highway network is at capacity and there will be increased congestion caused by road traffic due to increased passenger numbers, as well as traffic disruption during the construction period. Additional vehicles would ‘rat-run’ through the local area and villages, which would add pressure onto local roads and increase risks of accidents as well as cause damage to road surfaces. Some commented that there was a lack of transparency in the strategic modelling work.</p>	<p>Extensive modelling work has been undertaken to assess the performance of the highway network, with and without the Project in the future assessment years of 2029, 2032 and 2047. Construction scenarios have also been assessed separately. These assessments have been presented to and discussed with National Highways and local authorities and are set out in the DCO Application documents.</p> <p>Strategic modelling has been undertaken for the region, as set out in Chapter 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and a detailed technical report is included in <b>Transport Assessment Annex B: Strategic Transport Modelling Report</b> [<a href="#">APP-260</a>]. Traffic modelling for the construction scenarios is set out in Chapter 15 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. The strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network. The strategic modelling also informs the assessment in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>] which shows that there would be no significant effects arising from the Project in relation to traffic and transport.</p> <p>The strategic modelling work has informed the microsimulation VISSIM modelling, undertaken</p>

	<p>for the roads around the airport. This is set out in Chapter 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and a detailed technical report is contained in <b>Transport Assessment Annex C: VISSIM Forecasting Report</b> [<a href="#">APP-261</a>]. Overall, the future baseline scenarios indicate that without the Project, the network around the airport would begin to operate close to capacity in several locations. The inclusion of the highway works as part of the Project prevents unacceptable highway conditions arising.</p> <p>As shown in Diagram 12.3.3 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>], the airport is well located to the strategic highway network and 69% to 75% of airport traffic in the peak periods expected to be using the M23 Spur and M23 to the north and south. The increases in traffic on individual road links are assessed in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>] as part of the severance assessment. The assessment demonstrates that there would be no significant effects related to changes in road traffic on roads in local villages. Local authorities are responsible for the maintenance of the public highway and therefore the condition of road surfaces.</p> <p>Based on the strategic and microsimulation modelling assessments, together with the proposed highway improvement works, the Project is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation additional to the highway works already proposed.</p>
<p>There is a lack of surface transport improvements and funding.</p>	<p>The Project includes physical improvements to surface access, as summarised in Section 2.2 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>]. These improvements include new and improved layouts for the South Terminal roundabout (full grade separation), North Terminal roundabout (partial</p>

	<p>grade separation and junction reconfiguration) and Longbridge roundabout (junction reconfiguration), as well as enhancements to the A23 London Road and M23 Gatwick Spur (road widening).</p> <p>The proposed highway works incorporate improvements to active travel routes, including crossing facilities and improved footways and cycleways. These will help to overcome existing severance issues and improve the ability for pedestrian and cyclists to access the airport.</p> <p>The surface access improvement works will be fully funded by Gatwick Airport Limited and undertaken in consultation with National Highways and local authorities. The surface access improvement works are secured through Schedule 1 of the <b>Draft Development Consent Order</b> [<a href="#">AS-127</a>].</p> <p>GAL is also committed to funding improvements to bus and coach routes and frequencies, as well as funding towards other sustainable transport initiatives and to support local authorities in managing unforeseen off-site impacts. This is set out in Section 5 of <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>], which is Requirement 20 of Schedule 2 to the <b>Draft Development Consent Order</b> [<a href="#">AS-127</a>].</p> <p>The increase in trips associated with the Project has been carefully considered as part of the DCO Application, and the above demonstrates that funding is committed to surface access works to improve highway capacity, encourage sustainable travel and minimise potential off-airport impacts.</p>
<p>Disappointment that the application does not include proposals to upgrade rail connectivity to</p>	<p>A comprehensive assessment has been undertaken for rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of <b>Transport Assessment</b> [<a href="#">AS-</a></p>

<p>the airport and concerns that there is limited opportunity to expand the rail network. There are concerns that there will be insufficient capacity on train services to accommodate increased passenger numbers and luggage. Some respondents suggested proposals to increase the number of train services as well as to provide connections to the London Underground network and an east-west rail connection to respond to existing and future capacity issues.</p>	<p><a href="#">079</a>]. It also informs the assessment in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>].</p> <p>The assessment undertaken considers line loading (number of passengers on trains) at each station, the number of seats on trains that would be occupied (Seated Load Factor) and the percentage of standing capacity occupied (which illustrates the degree of crowding when standing passengers are expected).</p> <p>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 directions, although the assessment considers the potential effects on all services in all time periods.</p> <p>The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users. Where standing is expected on certain services, spare standing capacity would remain available. The rail crowding assessment indicates that no mitigation is required.</p>
<p>Active travel connections should be improved beyond what is currently proposed by the scheme.</p>	<p>The scope and scale of the proposed active travel improvements will support the modal shift outlined in Chapter 14 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>].</p> <p>The commitments made in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] include commitments to supporting and encouraging active travel in order to achieve the mode share commitments that GAL is making.</p>

	<p>The proposed active travel provision has been developed with due consideration of schemes identified in the Reigate and Banstead Local Cycle and Walking Infrastructure Plans (LCWIP) and Crawley LCWIP to complement these proposals as well as delivering a number of their desired connectivity outcomes.</p> <p>The active travel proposals include physical improvements to infrastructure at Longbridge roundabout, alongside the A23 London Road and Longbridge Way, between South Terminal, Gatwick Airport railway station and Balcombe Road and alongside Perimeter Road North between North and South Terminals.</p> <p>These improvements supplement the existing active travel routes, which are already largely off-road and will be retained. The assessment in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>] indicates that no other mitigation is required in relation to pedestrian and cyclist routes and facilities.</p>
<p>The active travel proposals are inadequate and greater active travel provision and cycle parking should be provided.</p>	<p>Section 5.2 of the <b>ES Chapter 5 Project Description</b> [<a href="#">AS-133</a>] summarises the active travel proposals for the Project. These proposals are illustrated in Figure 12.6.2 as part of the <b>ES Traffic and Transport Figures</b> [<a href="#">APP-037</a>], and <b>Surface Access Highways Plans: General Arrangements - For Approval</b> [<a href="#">APP-020</a>].</p> <p>The proposed active travel improvements have been influenced by the commitments set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>].</p> <p>The measures included in the final design proposals are expected to lead to a range of benefits for active travel users on key routes to and from the airport with improved connectivity and safety. The active travel infrastructure</p>



included in the proposed highway works would create an additional arterial route through Gatwick Airport alongside National Cycle Route 21. These routes are expected to increase the attractiveness of active travel for the surrounding area.

The proposed width of active travel provision has been based on expected demand levels, with due consideration given to guidance set out in the Department for Transport's Local Transport Note 1/20 (LTN1/20).

Significant improvements for active travel users are proposed at Longbridge roundabout with facilities becoming predominantly segregated including the introduction of a parallel toucan crossing and providing improved onward connectivity to Riverside Garden Park and North Terminal roundabout. The existing footway on the eastern side of A23 London Road to the south of the proposed shared use ramp is proposed to be widened. The newly proposed segregated route between Longbridge roundabout and North Terminal will provide a direct connection into the Airport for residents north of the Airport. It will be illuminated by street lighting and benefit from passive surveillance from the adjacent Car Park.

The section of active travel route from North Terminal to South Terminal would include signalised crossings and the route is proposed as shared-use.

GAL is also committed to further improvements of NCR21 in the vicinity of South Terminal, with the timeline for the delivery of the works is to be confirmed at a later date including whether it will be delivered as part of the Project or as a separate scheme.

	<p>As set out in paragraph 14.3.8 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>], cycle parking is reviewed on a regular basis and will be supplemented as part of the current Airport Surface Access Strategy (ASAS).</p>
<p>The proposed public transport measures are insufficient to address the increase in passenger numbers and should be prioritised over highway improvements. Some respondents suggested that the frequency of buses should be increased and bus priority improvements should be delivered.</p>	<p>Chapter 5 of <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] sets out funding commitments towards bus and coach services. The routes which have been identified are considered to be those most likely to have greatest influence on mode shares. These improvements have been tested in the strategic transport model to achieve the mode shares assessed as part of the DCO Application.</p> <p>GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other or alternative services if they would result in an equivalent level of public transport accessibility and support achieving the mode share commitments that GAL is making.</p> <p>The proposed highway improvements would benefit bus and coach services and users by improving road network performance (as shown in the results of the highway network local modelling set out in Chapter 13 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>], increasing network resilience and safety (through grade separation of the existing junctions), improving network connectivity (through the introduction of right turn movements from North Terminal onto A23 London Road) and improving active travel connections at bus stops.</p> <p>It is not considered necessary to provide additional dedicated bus and coach infrastructure as part of the proposed highway works.</p>

<p>The Applicant's mode share targets for the use of public transport and active travel are too low to address congestion-</p>	<p>The mode share commitments set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> present the position GAL is committing to achieve. These commitments draw on the modelling of mode choice and transport network operation. <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> also includes a section on GAL's further aspirations, which includes more ambitious mode share targets which GAL will be working towards. For the DCO Application, we have set the committed mode shares and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[AS-076]</a> and in the <b>Transport Assessment</b> <a href="#">[AS-079]</a> are delivered.</p> <p>The commitments will see increases in the number of people using sustainable transport modes. The forecasts do anticipate an increase in vehicular traffic and the proposed highway works are designed to address this. The transport modelling reported in the <b>Transport Assessment</b> <a href="#">[AS-079]</a> identifies the potential effects of that additional traffic in the wider area and concludes that no mitigation is required. The interventions proposed in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[APP-090]</a> have been included in the modelling, which provides confidence that the mode share commitments can be achieved with those interventions in place.</p>
<p>Requests for further clarity regarding on-site and off-site car parking proposals. Some respondents indicated that existing car parking is under pressure and the proposed increase in on-airport car parking is insufficient. There were</p>	<p>The proposed car parking provision is set out in Section 2.2 of the <b>Transport Assessment</b> <a href="#">[AS-079]</a>, as well as Section 2.4 of <b>ES Chapter 5 Project Description</b> <a href="#">[AS-133]</a>.</p> <p>There are currently 46,701 car parking spaces on the Airport. In the future baseline scenario, a number of car parking changes are planned for</p>

<p>concerns that the increase in car parking provision would remove greenfield land and be detrimental to the environment.</p>	<p>implementation in the absence of the Project which will bring the total of 53,271 spaces.</p> <p>The Project would result in the loss of 8,905 car parking spaces, all of which would be replaced elsewhere together with a net increase in car parking provision of 1,100 spaces.</p> <p>The locations of the new car parking provision are within the boundary of the Airport, as shown in Figure 5.2.1b contained in <b>ES Project Description Figures [AS-135]</b>. The majority of new or replacement car parking would be provided on existing car park land.</p> <p>The proposed car parking provision is included in the strategic transport modelling work and has therefore been considered when determining the likely effects of the Project and when setting the mode share commitments in <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b>.</p> <p>Following discussions with the local planning authorities and taking account of responses to the Summer 2022 Consultation, GAL is not seeking permission to re-provide capacity that may be withdrawn as a result of enforcement action on unauthorised, off-airport sites. The Project does not include proposals for any off-airport car parking.</p>
<p>High parking charges could deter air passengers from using on-airport car parking, as well as affect the ability of local residents to use Gatwick Airport rail station.</p>	<p>Car parking charges are used as a mechanism to discourage travelling to the airport by car and to make the sustainable travel modes more attractive. There are commitments in the <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b> on GAL using car parking and forecourt charges to influence air passenger travel choices. GAL will regularly review car parking charges in order to respond both to changing demand, for instance at different times</p>

<p>Parking charges might be too low which means sustainable travel options are not as attractive.</p>	<p>of year, and to progress towards achieving the mode share commitments it has proposed.</p> <p>The strategic modelling work includes assumptions on future car parking charges, which are set out in Chapters 6 and 7 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] for the future baseline and with Project scenarios respectively.</p> <p>The commitments in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] to improving buses and access by walking and cycling, together with the improvements to active travel infrastructure which form part of the proposed highway works, will also improve access to the station for local residents.</p>
<p>Valet parking, taxi operations and inappropriate off-airport car parking have had adverse impacts in local villages and the local area.</p>	<p>GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] sets out GAL's commitment to provide funding to support local authorities in introducing effective parking controls, monitoring activity on surrounding streets and/or taking enforcement action against unauthorised off-airport passenger car parking.</p>
<p>The M23 Smart Motorway scheme is unsafe.</p>	<p>The safety of the Smart Motorway scheme which has been completed on the M23 is the responsibility of National Highways as the relevant highway authority.</p> <p>The modelling which supports the DCO Application included the Smart Motorway configuration on the M23, which already exists. The assessment concluded that there would be no significant change in operation of the M23 which would require mitigation. The outcomes of</p>

	the assessment have been discussed with National Highways.
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#### 4.27 Water Environment

4.27.1 Table 4.27.1 below summarises the issues raised in the RRs and the Applicant’s response to those issues, including locations within the Application Documents where further information can be found.

**Table 4.27.1 Thematic issues and the Applicant’s response – Water Environment**

Summary of issues raised in the RRs	The Applicant’s response
Further development within the floodplain will increase the risk of flooding	<p>The Applicant has demonstrated in the <b>ES Chapter 11: Water Environment [APP-036]</b> and <b>Appendix 11.9.6: Flood Risk Assessment (FRA) [AS-078]</b> that the proposed development will not increase flood risk to other parties. The Applicant has demonstrated in the <b>ES Chapter 11: Water Environment [APP-036]</b> and <b>Appendix 11.9.6: Flood Risk Assessment (FRA) [AS-078]</b> that the proposed development will not increase flood risk to other parties.</p> <p>As stated in Section 8.1.5 of <b>ES Appendix 11.9.6: Flood Risk Assessment [AS-078]</b> the NRP would increase fluvial flood risk on the airfield but would not affect other parties. GAL has existing plans in place to respond to flood events to ensure the safety of passengers and staff as set out in <b>ES Appendix 11.9.6: Flood Risk Assessment, Annex 6: Flood Resilience Statement [APP-149]</b> that demonstrates compliance with national planning policy.</p> <p>The <b>ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</b>, demonstrates through hydraulic modelling, that with the flood mitigation measures as listed in Table 11.8.1 of <b>ES Chapter 11: Water Environment [APP-036]</b> the project would remain safe for its lifetime without increasing flood risk elsewhere. The <b>ES</b></p>

**Appendix 11.9.6: Flood Risk Assessment** [[AS-078](#)], demonstrates through hydraulic modelling, that with the flood mitigation measures as listed in Table 11.8.1 of **ES Chapter 11: Water Environment** [[APP-036](#)] the project would remain safe for its lifetime without increasing flood risk elsewhere. The modelling has incorporated the predicted impacts of climate change on peak river flows for fluvial flood risk in accordance with current Environment Agency guidance based on UK Climate Projections 2018 (UKCP18). Additionally, an Integrated Catchment Model has been developed to undertake a sensitivity test on the interaction between fluvial and pluvial flood risk should they coincide which also demonstrates the effectiveness of these mitigation measures.

Additionally, the 1 per cent (1 in 100) AEP event, plus a 40 per cent climate change allowance, has been tested as an exceedance scenario for the airfield (as a sensitivity analysis) and results are mapped in **ES Appendix 11.9.6: Flood Risk Assessment** [[AS-078](#)], Figure 7.2.6 and it is shown that flood risk is not increased by the Project outside the Project site boundary and that there is betterment to third parties.

A sensitivity test was also undertaken to determine the effects of the airfield surface water drainage network to fluvial flooding from local watercourses. The increase in impermeable area as a result of the surface access highways improvement works would also result in an increase in flood risk to other parties without mitigation. However as set out in **ES Appendix 11.9.6: Flood Risk Assessment Annex 2** [[APP-148](#)], the NRP includes measures such as attenuation and storage ponds, online pipe storage and other SuDS measures such as swales to ensure there would be no increase in

	<p>risk to other parties for its lifetime by restricting peak runoff rates to at least existing levels, incorporating the predicted impact of climate change. The integrated hydraulic modelling results (mapping within <b>Annex 4 of ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-149]</a>) indicates that the mitigation strategy would ensure no increase in flood risk to other parties in such circumstances.</p>
<p>The existing wastewater network and infrastructure will not be able to cope with the additional flows from NRP</p>	<p><b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and <b>ES Appendix 11.9.7 Wastewater Assessment</b> <a href="#">[APP-150]</a> present an assessment of the increase in wastewater flows emanating from the Gatwick Airport site in percentage terms, with flow figures for a ‘wet day’ given in the <b>ES Appendix 11.9.7: Wastewater Assessment, Table 8.3.1</b> <a href="#">[APP-150]</a>. For comparative purposes the total outflow from the airport site has been calculated as the sum of the peak outflow from each component of the airport complex on a ‘busy day’ in terms of passenger numbers. A ‘wet day’ has been defined as a day where the rainfall is the maximum that would be used by a Water Company to design a public sewer.</p> <p>The Applicant’s liaison with TW is ongoing, to date no concerns have been raised regarding the capacity of its infrastructure to cope with the change in flows due to NRP.</p> <p>The Applicant anticipates that TW would have completed an assessment of the likely impacts during the Examination period.</p> <p>It is considered that there will be sufficient time to complete potential required upgrades prior to NRP commencing operation.</p> <p>It is normal that a Water Company would plan for anticipated growth within each treatment works</p>



catchment, and therefore the differences in outflows from the airport with the NRP over the corresponding figure without the NRP are given for each of the design years (2029, 2032, 2038 and 2047) in **ES Appendix 11.9.7: Wastewater Assessment, Table 8.3.1** [\[APP-150\]](#). It should be noted that the NRP includes upgrades to the on-site wastewater drainage system that will reduce the amount of surface water that can enter the wastewater system and thus the wet day comparisons for each design year show a reduction in maximum outflow to the public sewer system. However, maximum outflows on both wet and dry days will increase over those calculated for the 2018 'baseline' year. The 2018 baseline flows were calibrated from measured flows.

Gatwick Airport discharges to two separate Thames Water (TW) catchments, Horley Sewage Treatment Works (STW) and Crawley STW. Initial consultation with TW suggested that there were capacity issues in the network draining to Horley STW and it was therefore proposed that flows from the part of the Gatwick Airport site that is on the east side of the London to Brighton railway line be diverted to Crawley STW as part of the NRP. This will mean that on a dry day there would be no change in the actual peak flow discharged to the TW infrastructure draining to Horley STW and only a 7.1% increase in total daily volume (2047 predictions compared with the 2018 baseline – busy days). On a corresponding wet day actual peak flow and total daily volume have been assessed to fall by 19.4% and 21.7% respectively. There should therefore be a beneficial impact on the TW infrastructure to Horley STW and the STW itself.

However, this proposal will transfer the wastewater impact of the NRP to the Crawley STW catchment. The proposed diversion will take

	<p>the flows from the east side of the railway line directly into Crawley STW so this will only impact the STW itself and not the sewerage network. The actual peak flow into the existing TW infrastructure will not increase as the outflow from the airport is pumped and therefore limited by the pump capacity. Due to increased passenger numbers, discharge volumes from the North Terminal side of the site will increase on dry days though, and therefore the pumps will be running for longer. Total daily volumes discharging to the existing TW infrastructure to Crawley STW are predicted to increase by 19.3% on a dry day, but be reduced by 13.9% on a wet day due to the on-site network improvements (2047 predictions compared with the 2018 baseline – busy days). There is a possibility that the increased volumes in dry weather could have a negative impact on the capacity available in the TW infrastructure to convey flows from other parts of the catchment, but if the infrastructure can accommodate the existing wet weather flows it is thought that any negative impact would be small.</p> <p>Total daily volumes discharged from Gatwick Airport to Crawley STW are predicted to increase by 67.5% on a dry day and by 16.7% on a wet day. These figures include for the proposed flow diversion. The wet day increases quoted in this response do not include an allowance for climate change, though this would be taken into account in the design of infrastructure and treatment works upgrades.</p>
<p>Water quality in local water bodies will decrease as a result of NRP discharges</p>	<p>The Applicant has demonstrated in the <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and <b>ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment</b> <a href="#">[APP-145]</a> that with the provision of a new treatment facility the increased capacity mitigates the increased risk of contaminated water being discharged into</p>

	<p>receiving watercourses. The HEWRAT assessment (<b>ES Appendix 11.9.3: Water Quality HEWRAT Assessment</b>) [<a href="#">APP-144</a>] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project’s surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>As stated in <b>ES Chapter 11: Water Environment</b> Table 11.8.1 [<a href="#">APP-036</a>], a proposed water treatment facility will be constructed to mitigate the increase in de-icer contaminated runoff as a result of the NRP. The treatment facility could also reduce the discharge from the pollution storage lagoons into Crawley STW. A schematic of the proposed contaminated water path for the airfield is included as <b>Figure 11.8.1 in ES Water Environment Figures</b> [<a href="#">APP-057</a>].A schematic of the proposed contaminated water path for the airfield is included as <b>ES Figure 11.8.1</b> [<a href="#">APP-057</a>].</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the <b>List of Other Consents and Licenses</b> [<a href="#">APP-264</a>].</p>
<p>The impact on water resources from the additional demand created by NRP</p>	<p>The Applicant notes the concerns regarding the impact on water resources from the additional demand created by NRP.</p> <p>Liaison with SESW is ongoing but to date they have not raised any concerns regarding their ability to meet the additional demand resulting from NRP (ignoring any water use savings that will result from Gatwick Airport’s Second Decade of Change).</p> <p>The Project does not include a target for reduction in potable water use. However</p>

	<p>separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change, such a reduction would exceed the reduction requirements of ENV9. As a conservative approach this reduction has not been taken into account in the Environmental Impact Assessment.</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment.</p>
<p>There should be increased monitoring of outfalls and pollution.</p>	<p>GAL already undertakes significant monitoring of its discharges to local watercourses, which would continue.</p> <p>Requirements 10 and 11 of the <b>Draft Development Consent Order</b> <a href="#">[AS-127]</a> include commitments to agree monitoring plans of the surface, foul and highway drainage outfalls before construction can commence with the Local Planning Authority, Environment Agency and Lead Local Flood Authority. Procedures for monitoring are noted in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 1 – Water Management Plan</b> <a href="#">[APP-083]</a>. Procedures for monitoring are noted in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 1 – Water Management Plan</b> <a href="#">[APP-083]</a>.</p> <p>Table 11.8.1 in <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> schedules the monitoring that will be undertaken as part of NRP for the water environment including ongoing monitoring of surface water drainage discharges</p>

## 5 Conclusion

- 6.1.1 The Applicant appreciates the time and effort taken by each IP to submit a RR. As demonstrated by the explanations and cross-references provided in this report as well as those in the **SoCGs** (Doc Ref. 10.1), the DCO Application addresses all issues concerning the Project that were raised in RRs, although it is acknowledged that RRs may not agree with the Applicant's assessments and their outcomes.
- 6.1.2 The Examination provides a forum for these matters to be addressed and the Applicant is willing to discuss the above matters further through as part of that process.