



GATWICK AIRPORT NORTHERN RUNWAY PROJECT – DEVELOPMENT CONSENT ORDER (DCO)

CRAWLEY BOROUGH COUNCIL - IP Ref: GATW-AFP107 PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT (PADSS)

~~27 OCTOBER 2023~~ 26 March 2024

Introduction

This [Principal Areas of Disagreement Summary Statement \(PADSS\)](#) document has been prepared by Crawley Borough Council (CBC), with input from the joint authorities and appointed consultants where required. CBC is a host authority for the [Gatwick Airport Northern Runway Project](#), which was accepted by PINS for Examination on 3rd August 2023. This document [updates the PADSS submitted on 26 October 2023](#). It identifies the [remaining and some new initial](#) principal areas of disagreement that have been identified [as further work has been undertaken in preparation of the Local Impact Report when reviewing the Projects DCO documentation](#). [The PADSS have been reviewed without reference to the Applicants project changes to the DCO, which were accepted into the Examination by the ExA on 8 March 2024. Commentary on these project changes will provided via a Written Representation to be submitted at Deadline 3 and will be correspondingly handled through the next iteration of the PADSS to be submitted at Deadline 5.](#)

[The Council hopes further engagement with GAL through the course of the Examination, including on Statements of Common Ground, will enable these Areas of Disagreement to be reduced when the PADSS is again updated at Deadline 5. The Council appreciates this document is long; however, its length is a reflection of the scale of its major concerns with the application. In the light of these concerns, the Council considers the length of the document to be reasonable.](#)

Contents

	Page
1. Aviation Capacity, Need and Forecasting	43
2. Project Description, Existing Site and Operation	65
3. Design and Access Statement	76
4. Landscape, Townscape and Visual Impact	98
5. Historic Environment	119
6. Agricultural Land use and Recreation	1411
7. Ecology / Nature Conservation and Arboriculture	1512
8. Water Environment	2014
9. Traffic and Transportation	2417
10. Air Quality	3520
11. Noise and Vibration	4225

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12. Carbon and Greenhouse Gases	<u>4729</u>
13. Climate Change	<u>5635</u>
14. Local Economic and Socio-Economic Impacts	<u>6139</u>
15. Health and Wellbeing	<u>7448</u>
16. Cumulative Assessment and Impacts	<u>7750</u>
17. Draft DCO / other Miscellaneous Concerns	<u>8054</u>
<u>18?</u>	

AVIATION CAPACITY, NEED AND FORECASTING

Please note: Work is ongoing between York Aviation and the Applicant regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at Deadline 5, when the ExA request this is next submitted into the Examination.

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REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	The capacity deliverable with the NRP Proposed Development	Modelling by GAL of the capacity deliverable with the NRP has assumed that 1 minute separations can be achieved between all departing aircraft using the two runways. This is not possible with the existing structure of SIDS, particularly given the commitment not to use WIZAD SID in the night period, and so additional delays to aircraft will arise so increasing delays above those stated in the Application documents. As a consequence the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.	Full modelling of the interaction between the use of the two runways and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.	Uncertain – subject to GAL transparently undertaking and sharing the relevant simulation modelling.
2.	The forecasts for the use of the NRP are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for Transport forecasts and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.	The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (see point above). It is not considered good practice to base long term 20 year forecasts solely on a bottom up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport.	Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick in competition with other airports, not limited simply to traffic, including that from other regions of the UK, that has historically used the London airports.	Uncertain – subject to GAL producing robust modelling to underpin its forecasts of demand.

		In this case, top down benchmarking against national forecasts has failed to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand across the London system is reliant on the assumption that a third runway would be delivered at Heathrow.		
3.	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.	The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified. The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.	Uncertain – subject to remodelling of impacts by GAL.

PROJECT DESCRIPTION, EXISTING SITE AND OPERATION

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1. Existing Site and Operation (CH4 – ES) and Project Description (CH5 – ES)	Clarification of airfield boundaries and what the various plans show.	Lack of clarity about current airport boundary / operational airport boundary and extent of land needed for and controlled by the DCO. The boundaries need to be understood on drawings and in context of drafting of DCO to be clear on airport limits, any permitted development provisions and to ensure drafting of the DCO and requirements are effective and enforceable. These matters were raised at ISH2 and in the West Sussex LIR Section 4. the additional information provided by GAL in response to the ISH2 ExA questions does not satisfactorily address this point.	Revised plans to address these points showing for both existing boundaries and that proposed under the DCO.	HighUncertain

DESIGN AND ACCESS STATEMENT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	Lack of design quality controls and targets	Document has been prepared without any design ambition or commitment to measurable standards.	There needs to be clear commitments to meet required policies and design standards, ensuring minimum compliance with the adopted Local Plan. This has been explained in more detail in Section 24 of the West Sussex LIR (24.79 - 24.85)	Uncertain
2.	Indicative status of majority of DAS and lack of 'design fix'.	Appendix A1 is an inadequate Control document of insufficient detail. .	Applicant needs to work up more elements of the project in detail to enable more certainty on design of development. The design control document needs to contain much greater detail. (see comments in line 1 above)	Uncertain
3.	Lack of detail in document including lack of site context analysis, site constraints and opportunities (also lacking from ES Project Description)	Some aspects of development excluded from D and A document, also a general lack of contextual analysis including site opportunities and constraints. Insufficient information on design and visual impacts. This is of particular concern in environmentally sensitive locations.	More detailed design work required to ensure design quality, protection of visual amenities and more information to form any 'control' document. More certainty and detail needs to be agreed now to safeguard sensitive works sites and sensitive environmental assets. (see comments in line 1 above)	Uncertain
4.	Inconsistencies in documents within DAS and in relation to other supporting documents.	Conflicting descriptions and cross- referencing lead to uncertainty over what is proposed and which details should take precedent.	Updates and corrections needed for consistency and certainty. Examples have been provided in Section 24 of the West Sussex LIR	High

5. Section 7 and dDCO	Lack of defined parameters for some development and lack of on parameter plans and within Schedule 12 Control documents.	All development should have defined parameters for all elements including soil deposition and temporary storage areas	Without agreed parameters for all the development it is questionable how design details can be controlled. The applicants have not explained this. This is a complex project with some build elements being EIA scale development in their own right. Ensuring sufficient control over the numerous design elements of such a substantial project is considered essential. This has been explained in more detail in sections 8, 11 and 24 of the West Sussex LIR in respect of Pentagon Field and larger built elements of the project in general.	Uncertain
6. Section 9	Lack of detail on construction phasing	Need for further understanding on sequencing and co-dependencies between the project elements to ensure appropriate phasing and control of the development and ensure mitigations in place.	Further detail needed to that a comprehensive phasing plan can be agreed and to ensure all impacts from that phasing and implementation are understood and can be mitigated.	Uncertain
7. Control Document OLEMP	Safeguarding of existing landscaping and protection of visual amenities	Lack of detail on landscape protection measures and zonal approach proposed in document is too vague giving inadequate control to safeguard impacts. This is further explained in Section 8 (8.43, 8.55-8.57 and 8.67) and Section 24 of the West Sussex LIR	Significant detail needs to be added to these documents now to identify all important trees, hedges and landscape assets that could be impacted by the development. Mitigation principles need to be agreed now.	Uncertain

LANDSCAPE, TOWNSCAPE AND VISUAL IMPACT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	Absence of tree mitigation strategy or any acknowledgement of CBC requirements under policy CH6 in the adopted Crawley Borough Local Plan	There is no recognition of the landscape impact from the loss of trees within the DCO area and no robust measures to mitigate tree removal. Applicant needs to address this key policy and respond in this document and control documents to provide adequate mitigation. Applicant's development should comply with the requirements of policy CH6. (see West Sussex LIR including references at 8.1C, 8.67 and Section 9)	Applicant needs to address this key policy provide adequate mitigation to comply with the requirements of policy CH6.	Uncertain
2.	Lack of controls over visual impacts for some key project sites which are in sensitive locations including those near rights of way or close to the site boundary.	Concerns held that there is no control in relation to the townscape /landscape impact (both overall scale, landscape loss and lack of understanding of context) to ensure that future development does not harm the character of the area. These are identified in Section 8 and Section 11 of the West Sussex LIR	Additional information to be provided and associated mitigation to be reviewed and amended.	Uncertain
3.	Draft Development Consent Order, Requirements and Schedule 11 documents	Concern remains in relation to the controls to ensure the visual impacts of the development are appropriately mitigated.	Applicant to provide further information in relation to proposed landscape and visual impacts and further discussion and agreement needed on DCO wording. Further information has now been set out in	Uncertain

			the West Sussex LIR for the GAL's consideration.	
4.	Planning Statement Para 8.17.11	It is not clear how the mitigation referred to in para 8.17.11 (Artificial Light, Smoke and Steam) will be secured.	Applicant to provide further information	Uncertain.

HISTORIC ENVIRONMENT

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1. Code of Construction Practice (CoCP: Document 5.3.2)	Management of Historic Environment effects.	Section 5.2 (Historic Environment) of the Code of Construction Practice does not reflect the work proposed. The objective should be to protect or mitigate the setting of built heritage and the recording of affected archaeological deposits. Section 6.1 (Roles and Responsibilities) does not detail a Heritage Clerk of Works.	Further information is needed which should be related to the methodology proposed within the submitted Written Scheme of Investigation (Document 5.3, Appendix 7.8.2). A Heritage Clerk of Works should be appointed to manage the heritage and archaeological facets of the project.	High. - Updated position (Deadline 1): CBC are happy to discuss at the TWG both the wording of the CoCP and the need for a Clerk of Works. The extent of the proposed archaeological programme is at present not agreed but the document proposed under 7.2 will assist these discussions.
2. Environmental Statement (Chapter 7: Historic Environment)	Lack of historic background to the airport.	No clear understanding or description of the history of the airport development.	Provide an appropriate history of the development of the airport from the first half of the 20 th century and relate this to the potential archaeological impact of the scheme and where areas may be disturbed.	High - GAL have indicated in SoCG (V1 – March 24) that it will prepare such a report and will discuss this with CBC via Topic Working Groups. High
3. Environmental Statement (Chapter 7: Historic Environment)	Lack of archaeological evaluation within the airport perimeter.	The scheme of archaeological investigation undertaken prior to the submission of the DCO application has been focused on areas within the proposed development that were easily accessible and has not covered all potential areas of impact.	Appropriate commitment (with description and methodology) given within the Written Scheme of Investigation (Document 5.3, Appendix 7.8.2) to undertake investigations in all areas under threat from the proposed development, which have not been shown to have been disturbed/destroyed by previous development.	High Uncertain – no progress to date on this issue
4. Document 5.3, Appendix 7.8.2	Proposed mitigation on areas already evaluated.	There is concern that the proposed mitigation identified within the WSI on areas that have been evaluated is not sufficient and will need to be expanded. A list of concerns	Improved and expanded mitigation strategy within the WSI.	High

		regarding the proposed mitigation method and extent has been provided within the LIR and we would suggest that these can be discussed and hopefully agreed at the next TWG.(Section 7)		
5. Document 5.3, Appendix 7.8.2	Proposed building recording of control tower.	Proposed level 2 recording not appropriate for this type of rare structure.	Needs to be increased to a level 3 record and should be identified as a heritage asset.	High – Level 3 recording has been agreed by GAL but this now needs to be reflected in a revised version of the WSI for West Sussex.
6. Document 5.3, Appendix 7.8.2 and Code of Construction Practice (CoCP: Document 5.3.2)	No proposals for heritage community outreach which would normally be expected from a development of this nature.	No potential heritage community engagement identified in section 4.12.	Identify an outreach programme to inform the local area and heritage community of the results of the archaeological work.	GAL have indicated in SoCG (V1 – March 24) that they are happy to discuss adding a section regarding community engagement into the WSI for West Sussex. CBC are willing to engage and discuss further. Uncertain
7. Document 5.3, Appendix 7.8.2	There needs to be clarity within the documentation on the role of the local authority archaeologist in signing off the archaeological mitigation.	The submitted documentation fails to define a procedure for the monitoring and signing off of the archaeological and building recording mitigation works.	Clear sign off procedure needed, detailed within Written Scheme of Investigation.	GAL have indicated in SoCgG (1 – March 24) that happy to discuss adding this to WSI (matter to be progressed via TWG and SoCG discussions - High
8.	Impact on setting of nearby listed heritage assets	There is no evidence in this submission that the setting is not harmed though visual impact or light impacts.	Evidence to be provided and further information needed to understand how the proposed control documents such as the Design and Access Statement and Lighting strategy address these impacts / provide adequate safeguards for these assets. This point has been explained in more detail in Section 7 of the West Sussex LIR.	Uncertain

AGRICULTURAL LAND USE AND RECREATION

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1	Quality of and impacts upon existing recreational routes affected by the DCO works during and post construction	Lack of detail on the impacts on existing recreational routes as result of the works and the measures proposed to protect users (e.g., lorry routing, dust, damage to surfacing). Lack of detail or acknowledgement of potential opportunities to enhance and improve these routes for benefit of local community and for promotion of active travel. Further detail is set out in Section 11 of the West Sussex LIR (11.22-11.25, 11.28, 11.30)	Further detail needed on impacts and mitigations during construction and information on reinstatement and potential enhancements. Detail required to ensure rights of way remain open and safe to use. (See Table 11.1a, 11.1B and 11.1D for suggested mitigation)	Uncertain
2.	Appropriateness and adequacy of the proposed open space and recreation provision	Car Park B - Whether location is appropriate and lack of detail on the quality amenity benefit, function purpose, use and management. Museum Field – quality of provision/ usability of space and connectivity with surroundings. Further detail is set out in Section 11 of the West Sussex LIR (Car Park B 11.29 and Museum Field 11.26)	Further detail needed on routes and linkages, landscaping, signposting, amenity benefit, function, timing and delivery purpose and management of these spaces. See Table 11.1C for suggested mitigation and 11.31 in relation to Museum Field.	Uncertain

ECOLOGY / NATURE CONSERVATION AND ARBORICULTURE

Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	The extent of loss of mature broadleaved woodland (net loss over 5 ha)	Although some woodland will be re-planted along the new highway alignment it will be years before bat foraging and roosting habitat, and habitat connectivity are fully reinstated. The assessment concludes there is a significant effect on bat behaviour until new woodland planting had established. Current mitigation and compensation measures are insufficient to maintain bat foraging habitat and commuting routes over the short and medium term.	The Applicant should seek additional compensation measures, if necessary off-site, to ensure no adverse impacts on broadleaved woodland habitat and bats. The joint West Sussex LIR (REP1-068 and REP1 – 069) -makes recommendations, including advance highway tree planting. It also requests greater clarity on woodland loss and compensatory planting in the Sketch Landscape Concept Plans within the OLEMP, and further explanation of the woodland BNG calculations	Uncertain
2.	Lack of approaching assessing and addressing ecological impacts at a landscape scale	Ecological impacts will extend beyond the DCO limits with potential impacts on bat populations, riparian habitats downstream of the Airport and the spread of non-native aquatic species. Disturbance and habitat severance within the Airport will impact the functioning of wildlife corridors, notably bat commuting routes, both within the Site and the wider landscape. Maintenance of habitat connectivity across the airport and wider landscape remains a concern.	The Applicant should adopt a landscape scale approach to assessing and addressing ecological impacts, including the need to provide off site mitigation, compensation and Biodiversity Net Gain. Enhancements are required to green corridors and improved habitat connectivity to extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	Uncertain
3.	Lack of opportunities for biodiversity enhancement	Many potential opportunities for biodiversity enhancement, both within and outside the DCO limits, were never explored.	Explore further opportunities for biodiversity enhancement e.g., conversion of 'amenity grassland' on road verges and roundabouts to wildflower grassland, and the improved management of Gatwick Stream and Crawler's Brook. This concern is repeated in the Joint West Sussex LIR. CBC hopes to have further discussions with the Applicant, including regarding the landscape design for the internal road network.	Uncertain

4.	Need for security of long-term positive management of the two biodiversity areas - the North West Zone and Land East of the Railway Line.	These areas are of considerable biodiversity value and key components of the ecological network. Any loss or degradation could have significant impacts on the effectiveness and viability of the proposed mitigation areas.	A legal commitment to provide certainty that these two biodiversity areas will continue to be managed for wildlife. <u>The Joint West Sussex LIR request greater clarity and commitment in the OLEMP regarding the long term positive management of these areas.</u>	Uncertain
Arboriculture				
5.	Evidence for null findings of ancient or veteran trees, as well as important hedgerows.	No demonstration that these receptors have been appropriately surveyed, nor followed appropriate methodology.	Demonstrate the methodology used to survey and identify potential ancient and veteran trees as defined by the NPPF (2021) which could be impacted within or surrounding the project boundary, as well as providing the survey data findings (including for important hedgerows).	Uncertain <u>High</u>
6.	Lack of Need for further demonstration that <u>the Project proposals have been adequately designed with consideration of arboricultural features through avoidance, mitigation or compensation have been considered, designed for and appropriately avoided, mitigated or compensated for.</u>	Potential loss or impacts to multiple to arboricultural features <u>which may be avoidable, mitigated or better compensated for, of unknown value.</u>	Provide a full arboricultural assessment for all arboricultural features in line with BS5837:2012 (inclusive of an impact assessment, outline method statement and tree protection plans). <u>Within the Arboricultural Impact Assessment (REP1-026):</u> <ul style="list-style-type: none"> • <u>Provide further detail of project proposals to demonstrate the need for the proposed tree removals, notably high quality and TPO trees (justify why mitigation measures would not be appropriate).</u> • <u>Provide design principles which may reduce tree loss during detailed design</u> • <u>Identify how Horleyland wood (and iother ancients woodland) is impacted at a worst case design scenario (including direct and indirect impacts) and detail any measures proposed in mitigation or compensation (such as appropriate buffer zones specific to the site).</u> • <u>Identify how compensatory tree planning proposals considers Local Plan Policy CH6 of the Crawley Borough Local Plan 2015 – 2030 of the Joint wst Sussex LIR0</u> 	Uncertain <u>High (if further discussion is initiated)</u>

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7.	<p>The <u>Outline Arboricultural Method Statement OLEMP and CoCP</u> does not demonstrate <u>sufficient appropriate outline methodology</u> for tree protection <u>and including</u> ancient woodland buffer zones.</p>	<p>Potential <u>for adverse impacts multiple to</u> arboricultural features, <u>including irreplaceable habitat</u>, due to a lack of tree protection.</p>	<p><u>Produce an arboricultural assessment and tree protection measures referred to within the OLEMP and/or CoCP.</u> <u>Within the Outline Arboricultural Method Statement (REP1-023; REP1-024 and REP1-025):</u></p> <ul style="list-style-type: none"> • <u>Provide protection measures to be adopted for ancient woodland buffer zones.</u> • <u>Provide affirmative wording throughout (avoiding such words as 'should').</u> • <u>Adress conflicting working methodologies (such as 3.2.3 and 4.1.1 conflicting with 3.4.1)</u> • <u>Provide working methodologies for all types of works which may occur with root protection areas of retained trees (including landscape works)</u> • <u>Amend Section 4.4 to ensure monitoring is recorded and accounts for other tree protection measures such as ground protection.</u> • <u>Provide 'heads of terms' and general principles to be included within the detailed aboricultural methios statements which accounts for all working methodologies near trees, tree work operations and provision of physical tree protection.</u> • <u>Identify what will be shown within tree protection plans.</u> • <u>Identify when arboricultural advice or supervision will be required for working methodologies near trees.</u> <p><u>Where appropriate, amend the CoCP to reflect any changes as a result of the above.</u></p>	Uncertain
8.	<p>The OLEMP does not provide <u>clarity that detailed arboricultural method statements and planting plans and aftercare sufficient detail to ensure that adequate planting and aftercare plans</u></p>	<p><u>Potential impacts multiple to arboricultural features due to a lack of tree protection, and unclear proposed compensatory soft landscaping. Inadequate provision of aftercare for proposed tree planting.</u></p>	<p>The OLEMP <u>should identify that the following will be produced in detail, and refer to best practice or guidance in which they should adhere to: arboricultural method statements; tree protection plans, tree/vegetation removal plans and tree work schedules; needs to identify what will be included within the detailed planting and specification plans. It</u></p>	Uncertain <u>High</u>

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	management will be provided within proposed LEMPs.		also needs to provide adequate aftercare for tree planting (as detailed within paragraph 9.72 of the Joint West Sussex LIR); and, planting aftercare and management plans.	
9.	Inadequate consideration and demonstration for the protection of ancient woodland. Conflicting with the finding of 'no impact' occurring to these receptors.	Potential impact to ancient woodlands receptors where barriers are specified to form buffer zone protection. This is of principle concern for Horleyland Wood due to the adjacent proposed works area for the new foul water pipeline.	Where barriers are specified to form buffer zone protection, spacing/distance of buffer should follow recommendation withing statutory guidance provided by Natural England and Forestry Commission 2022. The specification and methodology for the proposed barriers and need to be demonstrated. Further, the appropriate positioning of barriers needs to be identified on tree protection plans.	Uncertain <u>High</u>
10.	Compensation strategies for tree, woodland and hedgerow loss does not demonstrate adequate compensation, and that proposed compensation being recognised as a significant long term impact.	The net loss of woodland, the fragmentation of habitat connectivity, and the long-term effect from the time required to establish new planting.	An increased compensation strategy for compensatory woodland planting. The OLEMP lacks demonstration that compensatory tree planting proposals consider local plan policy CH6 of the Crawley Borough Local Plan 2015 – 2030 (as detailed within para 9.73 of the Joint West Sussex LIR).	Uncertain

WATER ENVIRONMENT

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	In respect of the overall drainage strategy CBC remain concerned that the concept designs did not provide sufficient. It would be helpful if GAL could share the Consultee comments from key stakeholders such as the Environment Agency to understand how aligned or otherwise, they are with our views on the drainage and FRA work done to date. It was not clear how all this has progressed from the PEIR consultation.	These need to be circulated in advance before the TWG if meaningful feedback is expected.	CBC would like to see the evidence behind the FRA work that underpin the concept design.	Low
2.	Drainage – South Terminal Roundabout substantial modification to surface water pond.	CBC request the design parameters for the new pond are provided if this proposal is to be taken forward along with details of the changes that will be carried out on the existing pond, the impact and mitigation measures and most importantly, of how water quality has been addressed in accordance with the SuDS manual.	CBC and other stakeholders would like to see the design parameters for the new pond and the mitigation measures put in place	Low
	The Updated flood compensation plan shows that there will be a reduction in size of (i) the Museum Field and Car Park X flood compensation areas, (ii) removal of the flood compensation area to the south of Crawley Sewage Treatment Works and the small area to the east of Museum Field and (iii) the removal of the surface water drainage Pond A and the extension to Dog Kennel Pond from the initial proposal of GAL to provide additional flood storage.	CBC has insufficient detail to accept the assumptions set out in this update and request that it is provided with further information	A simple tabulated hydraulic model report showing the comparison between the storage requirement of the 35% and 20% event. This should support the explanation of how this reduction was arrived at and help to demonstrate the practicality of this scenario	Low

3.	Evidence to show that the connection between the museum field compensation storage area and the river Mole will not have a detrimental effect on the geomorphology of the watercourse bed.	CBC also requests confirmation of how the possible adverse effect of this connection will be mitigated. <u>GAL in APP083 has proposed to use soft/bio engineering at the connection between the new flood compensation areas and the river Mole. This connection has to be properly managed to prevent further environmental disaster to the geomorphology and the bank of the watercourse and at this stage GAL's proposal is a generic statement and a more detailed information of the type of soft engineering and how it will be implemented will be required.</u>	CBC would like to see the evidence of the work done in this area and a plan showing how any identified adverse effect on the watercourse geomorphology will be mitigated.	<u>Low_High</u>
4.	CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y.	Car Park X and Y works may have potential negative impact on nearby buildings	Can further details be provided of what these works consist of and what the impacts are.	High
5.	GAL has proposed an additional three hectares of carriageway will be created from the proposed work to the highway and three attenuation basins and two oversized pipes have been planned as part of the highway drainage strategy to mitigate the increase in impermeable area	The proposal can be improved, and this should be an opportunity for GAL to improve on the sustainability aspect of the Highway and in addition to water quantity provide water quality mitigation strategy in line with the SuDS manual, this should not be a case of just doing the minimum.	<u>A code of construction practice APP083 has been provided by GAL. The measures set out in this document to manage water quality and potential flood risk during the construction phase are generic and a more site specific and design related plan will be required. Most likely more relevant information will be made available after the detailed design.</u> An improved proposal with more done around water quantity and quality mitigation.	<u>Low_High</u>
6.	While it is understood that there is the need for GAL to attenuate water using systems that can be designed to reduce the attraction of birds	The use of concrete attenuation structures if possible be avoided.	the use of a more sustainable approach with reduced carbon footprint will be the preferred option rather than using designs with a high carbon footprint. <u>Although, GAL has proposed in APP 078 to use soft engineering where there is a connection between the new flood compensation areas and the watercourse, but what kind</u>	<u>High_Low</u>

			<u>of flood features will be adopted for the FCA is not stated.</u>	
7.	Residual risk when flood structures are overwhelmed.	While Gal has proposed several mitigation strategies as it relates to flood risk, how they intend to deal with possible residual risks in the event these structures are overwhelmed or a possible blockage on the watercourse should be identified.	The residual risks should be identified, and proposals put in place to address them	Low
8.	The proposed highway drainage strategy will reduce discharge by 38% to the Gatwick stream and 50% to the river Mole	Can GAL have a look at the effect this reduction in discharge will have on biodiversity and provide mitigation where necessary	CBC would like to see the evidence of the work done in this area and a plan showing how any identified adverse effect on the biodiversity of the ecosystem will be mitigated.	Low
9.	Overlap between drainage and ecology matters in relation to the northwest area and the impact on the river Mole	It would be good to understand the impact the drainage design and engineering solutions have on ecology in relation to matters such as sediment build up, flood overflow, de-icer storage and pollution control measures.	Further information should be provided on the management of both the drainage features and ecological mitigation measures.	Low
11. <u>10</u>	Capacity of Crawley Sewerage Treatment Works <u>Inconsistency with the design life of what constitute a surface access work and an airfield access work</u>	No confirmation to date from Thames Water regarding the impact and capacity of the Crawley STW, taking into account other planned development in Crawley. If upgrades to the Works are deemed necessary, no clarity on whether this could impact on phasing for other developments <u>‡The ES in APP147 states that fluvial flood risk for the surface access works has been assessed using a 100-year life span and 20%CC and airfield access works for 40 years life span and 12%CC with a sensitivity test of the 40% scenario while for pluvial flood risk</u>	Confirmation from Thames Water <u>The rationale for this approach here is because a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. However, it should be noted that section 2.2 describes part of the airfield access works to include extensions to the existing airport terminals (north and south); and provision of additional hotel and office spaces. These are structures with a design life span of 100 years. can GAL clarify if these structures are planned for demolition in 40 years. otherwise, i believe there should be a re-classification of what constitute the surface access works and the airfield works and where these will</u>	<u>Uncertain</u>

		the surface access works has been assessed using a 100-year life span and 40%CC and airfield access works for 40 years life span and 25%CC with a sensitivity test of the 40% scenario for the airfields works.	affect the climate change scenarios adequate steps should be taken to rectify this mistake.	
11.	Water demand mitigation	No specific water use targets, and no commitments to ensure sufficient measures are delivered to mitigate water supply impacts in an area of water stress. This point is explained in Section 24 of the West Sussex LIR para 24.83 and Table 24.1D	Commitment to specific targets and defined measures	Uncertain

TRAFFIC AND TRANSPORTATION

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
<p>The Council also endorses the PADSS submitted by West Sussex County Council as the Highway Authority particularly regarding the transport modelling and mitigation for impacts on the highways which are not repeated here.</p>				
1.	Surface Access Commitments - target mode shares	<p>Insufficient evidence and justification provided to demonstrate how the target mode shares will be achieved. Stronger commitment to the aspirational mode shares should be made. <u>As per the feedback of West Sussex County Council as Highways Authority, the council retains concerns that it will be challenging to achieve the 55% public transport mode share target through the identified bus and coach measures alone, i.e. without wider bus priority measures nor any changes to rail.</u></p> <p><u>There is an opportunity to increase the attractiveness of alternative modes of travel, i.e. through bus priority measures to deliver journey time savings, or a clearer approach as to what rail interventions can be made. Such measures could support delivery of the 55% mode share target for public transport, or enable a greater percentage of staff and passengers to access the airport via sustainable transport modes.</u></p> <p><u>West Sussex LIR Paras 17.72 to 17.93 refer.</u></p>	SACs and associated mitigation to be reviewed with more clarity on specific sustainable travel improvements	Uncertain

<p>2.</p>	<p>Surface Access Commitments - rail</p>	<p>High rail mode shares are critical to the SACs but there are no measures to enhance rail services or further improve the station, despite the evidence demonstrating services on the Brighton Mainline <u>are already and will continue to</u> be overcrowded with just standing capacity available and the station will be congested at times.</p> <p><u>At ISH4, the GTR representative raised concerns about over-crowding/standing for both peak and off-peak services, and advised that increased rail capacity is needed to accommodate additional air passengers on top of domestic passengers as a minimum. GTR suggested that a reasonable, proportionate contribution would be sought towards increasing rail capacity.</u></p> <p><u>This reflects concerns raised by the Joint Local Authorities regarding impacts on the Brighton main line, as set out at Paragraphs 17.43 to 17.47 of the West Sussex LIR.</u></p>	<p><u>Request that GAL continue dialogue with Network Rail to agree appropriate mitigation and provide funding to support rail improvements.</u></p>	<p>Low</p>
<p>3.</p>	<p>Surface Access Commitments – Active Travel connections</p>	<p>Enhancements to routes beyond the immediate airport connecting to wider networks, particularly improvements to NCR21 south to Crawley are essential to meet staff mode share targets, given how low current <u>Active Travel</u> mode share is. <u>This is discussed at 17.92 of the West Sussex LIR. GAL's commitment to developing an ASAS to support the SAC document, and to engage with the local authorities regarding active travel infrastructure is acknowledged. However, Certainty on the delivery of required improvements is needed to determine if the effectiveness/realism of the staff active travel mode share targets are realistic.</u></p>	<p><u>Ensure Provide</u> improvements to active travel connections <u>are provided</u> (or funding <u>and agreed commitments</u> for <u>delivering</u> these)</p>	<p>Uncertain</p>
<p>4.</p>	<p>Surface Access Commitments– Bus services</p>	<p>Commitments made in relation to bus and coach service provision should include Route 200 (from Horsham, through Crawley's western neighbourhoods and Manor Royal to Gatwick Airport). <u>-The Joint Local Authorities note that the Applicant's response in the SoCG appears to focus on roads within and close to the airport, but this misses the point that improvements across the whole network should be supported. Bus</u></p>	<p><u>Provide bus priority measures that achieve improvements</u> on the wider network (or funding for these). <u>not just roads that are within the control of the Applicant. For example, -f</u></p> <p><u>Funding</u> improvements to Route 200 <u>continue to be considered necessary.</u></p>	<p>Uncertain</p>

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		times should also be included. <u>This is discussed at 17.32 to 17.36 of the West Sussex LIR.</u>		
5.	Surface Access Commitments -Transport Mitigation Funding	<p>No indication of scale of funding for the <u>The Transport Mitigation Fund, as currently proposed by GAL, would provide £10million over a nine-year period. We question if this is sufficient, and whilst there remains uncertainty as to what projects this is intended to cover, if there is expectation that it is used for Active Travel north/south/east/west of the Airport, plus bus priority and/or service improvements across the wider network on routes serving the airport, and potentially also rail improvements, then the £10million is unlikely to be sufficient. As an example, improvement of Crawley Route A alone (Gatwick Airport to Town Centre via Manor Royal) is currently estimated through the Crawley Local Cycling and Walking Strategy (LCWIP) to cost between £4.06m and £7.2m. Three other Active Travel Route improvements are referred to in the West Sussex LIR (Para 17.92) as mitigation for the DCO – these are collectively costed at between £5.09m and £14.22m.</u></p> <p><u>This point is not covered in detail in the West Sussex LIR as discussion has been ongoing. We note that the Transport Mitigation Fund remains subject to ongoing negotiation through the S106 agreement process.</u></p>	Clarify nature and scale of funding – <u>under discussion as part of S106 agreement.</u>	High
6.	Surface Access Commitments - Sustainable Transport Fund	<p><u>Commitment to continue the parking levy to support the Sustainable Transport Fund is welcomed but the amount per space needs to increase to compensate for the proportionate decrease in staff and passenger parking. This matter is subject to ongoing negotiation through the S106 agreement process.</u></p> <p><u>Paragraph 17.86 of the West Sussex LIR refers.</u></p>	<p><u>Ensure that the Sustainable Transport Fund methodology provides sufficient funding to support sustainable transport access to the airport in line with passenger growth.</u></p> <p><u>This point does not appear to have been responded to by the Applicant in the SoCG.</u></p>	High

			<u>Under discussion as part of S106 agreement.</u>	
<u>7.</u>	<u>Surface Access Commitments – Parking Enforcement</u>	<u>CBC welcome the Applicant's offer to make an annual financial contribution towards airport-related parking investigation/enforcement. We do however have concern that the monies proposed are not sufficient to fund a post at the required level. This matter is subject to ongoing negotiation through the S106 agreement process.</u> <u>Paragraph 17.86 of the West Sussex LIR refers.</u>	<u>Clarify the nature and scale of funding. Under discussion as part of S106 agreement.</u>	<u>High</u>
<u>68.</u>	<u>Surface Access Commitments – enforcement</u>	<u>The proposed monitoring framework does not demonstrate how remedial action, should it be necessary, will be secured nor what sanction will be in place should commitments remain unmet.</u> <u>CBC remain of the view that a more robust approach is required to ensure that growth in passenger numbers is suitably aligned with the applicant delivering upon its surface access commitments. Greater certainty should be provided through a 'Green Controlled Growth' approach similar to that progressed at Luton Airport, whereby the growth of the airport is linked to the meeting of the relevant targets associated with surface access transport. This would provide a more effective mechanism (as opposed to GAL's proposed approach of additional interventions and annual review) to ensure that passenger growth is aligned with delivery of the surface access commitments. This is discussed at Paragraphs 17.83 and 17.92 of the West Sussex LIR.</u> <u>We note the Applicant's response in the Crawley SoCG, which sets out that the proposed SA monitoring strategy is in keeping with the existing process. CBC would</u>	<u>Greater certainty should be provided through a 'Green Controlled Growth' approach similar to that progressed at Luton Airport, whereby the growth of the airport is linked to the meeting of the relevant targets associated with surface access transport.</u>	<u>Uncertain</u>

		<u>however point out that the current process is set through the existing S106 Agreement. That Agreement is not related to any planning permission and is entered into voluntarily by the airport operator. As such, there has been very little, if any scope, for CBC and WSCC to seek substantial changes to the Agreement. Accordingly, although both Authorities have signed the 2022 Agreement, and its predecessors, this should not be taken as an indication of CBC and WSCC being satisfied with its contents and the extent of the mitigation contained within it. This is discussed at Paragraphs 4.6 to 4.16 of the West Sussex LIR.</u>		
<u>97.</u>	CoCP and OCTMP	Concern about the lack of detail and clarity in the CoCP and CTMP, including no information regarding the criteria when and how much contingency routes will be able to be used.	Additional information to address these concerns is required.	Uncertain
<u>108.</u>	Methodology used to identify amount of new passenger parking	<u>Unclear what methodology has been used to identify the overall increase in parking numbers,</u> <u>The Authorities welcome the Applicant's preparation of the Car Parking Strategy (Book 10) - Application Document Ref 10.5.</u> <u>The document provides explanation as to how the Applicant has identified need for 1,100 new on-airport passenger car parking spaces in association with the Northern Runway Project. This is set out at Section 3.5 of the document, including the worked example of Table 2. The Authorities' understanding of this process (in summary) is that 2019 authorised on and off-airport spaces have been totalled up, with these assumed (for practical reasons) to operate at 87.5% capacity. The separate Transport Modelling has been used to estimate likely mode share for travel to/from the airport, and in assuming a public transport mode share of 55% to be achievable, appears to estimate a 20% increase in Park and Fly trips would arise from the Project. This uplift is plugged into the equation, to identify a total peak parking accumulation, with authorised off-airport</u>	<u>Information should be provided detailing how the proposed increase of 1,100 passenger spaces has been identified, and how this relates to passenger numbers within the context of the airport operator achieving its sustainable transport mode share obligations.</u> <u>Additional clarification required from Applicant to address points raised by CBC in relation to the Car Parking Strategy.</u>	High

		<p><u>spaces (at 87.5% capacity) subtracted off to give an estimated total on-airport parking requirement of 48,300 spaces (again assuming for operation at 87.5% capacity). The difference in total spaces from 2019 compared with the Project identifies a requirement for an additional 7,700 on-airport spaces, which subtracting the Applicant's baseline of 6,570 spaces, arrives at a requirement for the Project of 1,100 spaces.</u></p> <p><u>Noting this approach, the Authorities raise the following points relating to the Applicant's calculations:</u></p> <ul style="list-style-type: none"> <u>It would be helpful if the Car Parking Strategy could provide a more detailed commentary to explain how the mode share targets and uplift in Park and Fly trips are factored into the calculation. This will need to explain more clearly how the proposed number of new passenger spaces links to the mode share commitments in the SAC. The Authorities' understanding is that it is the "1.20 multiplier" that essentially factors in the Project's mode share targets to the parking need equation, but it would be helpful if this could be clarified by the Applicant.</u> <u>Table 1 of the Car Parking Strategy identifies 2019 passenger parking (GAL operated) totalling 40,611 spaces. This broadly reflects the equivalent figure shown in the September 2019 Local Authority Parking Survey, which identifies 40,790 GAL operated spaces. Whilst this shows the total number of GAL operated spaces, the Authorities note that there are other passenger parking spaces on-airport, for example the 3,280 spaces at Purple Parking, and other spaces at on-airport hotels including Povey Cross Travelodge (623 spaces) and Sofitel (565 spaces). The omitted spaces, whilst not operated by GAL, are on-airport spaces that are used by passengers travelling to/from the airport. From the Car Parking Strategy, it is unclear</u> 		
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		<p><u>if or how these (and other on-airport spaces not operated by GAL) have been taken into account in the Table 2 worked example. The Authorities would wish to understand how on-airport spaces not operated by GAL are taken into account in any calculations, as to exclude them may present risk that the Applicant is over-estimating the amount of new parking required as a result of the Project.</u></p> <ul style="list-style-type: none"> <u>The Authorities note that the Applicant is including within its Baseline the 820 parking spaces proposed at the Hilton Hotel. Notwithstanding the Authorities' concerns as to the appropriateness of some specific projects being included in the Baseline, there would seem a point of consistency as to why the non-GAL operated Hilton proposal is included, when existing non-GAL operated on-airport parking (as mentioned above) appears not to factor into the calculations.</u> <u>The Applicant has identified authorised off-airport provision for 2019 as being 21,200 total spaces. This does not appear to tally with the equivalent figure in the September 2019 Local Authority Parking Survey, which identifies 18,110 authorised off-airport spaces. It is unclear why the Applicant's figure is higher. It may be that the Applicant has based its calculations on a different Airport Boundary to that used by the Authorities (for clarity it is the Gatwick Airport Boundary as shown on the Crawley Local Plan Map 2015 that should be used for the purpose of determining whether a location is on or off-airport). It is possible that the Applicant may have included within its off-airport figure parking within the airport boundary that is not operated by GAL. It would be helpful if the Applicant could please clarify in more detail the sites included in its authorised on and off-airport figures, including a map showing the site locations.</u> 		
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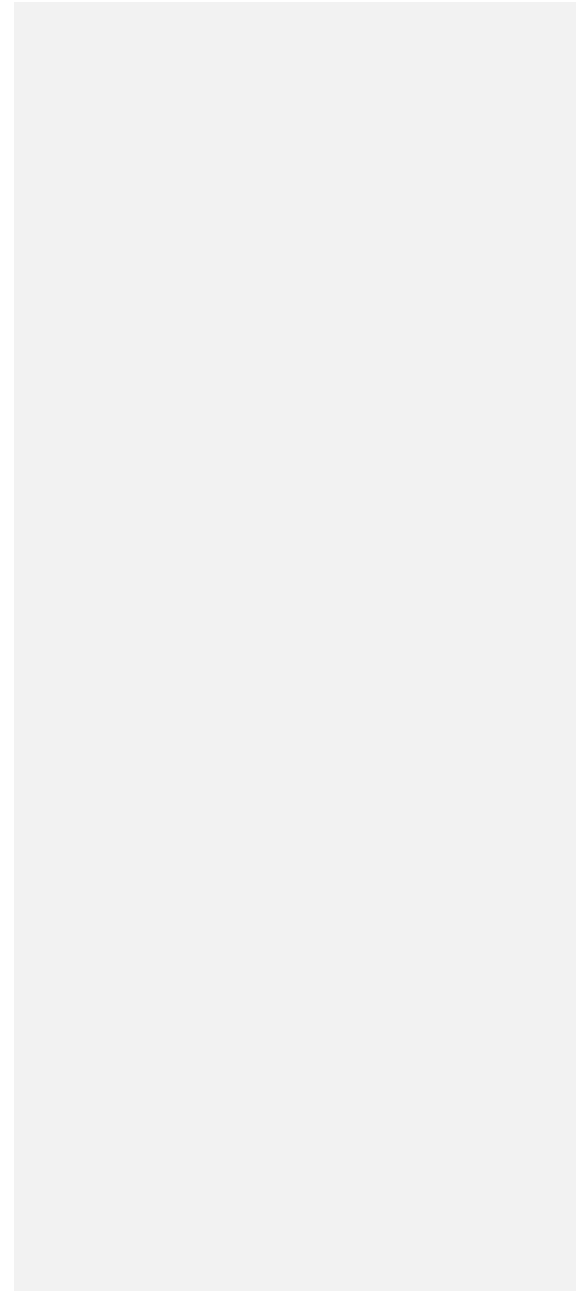
<p>119.</p>	<p>Staff Parking Numbers and Updated Staff Travel Survey</p>	<p>The council previously noted that whilst supporting the objective to increase staff travel by sustainable modes, it is not clear how the 1,150 space reduction in staff parking relates to sustainable mode share objectives especially since there will be more staff at the airport as a result of the project.</p> <p>The Applicant submitted a Car Parking Strategy at Deadline 1. This confirms that as of 2019, there are 6,090 staff parking spaces on-airport, and sets out a commitment to keep staff parking at or below this figure with the Northern runway Project, noting that with staff numbers expected to increase, this equates to a reduction in spaces relative to staff numbers.</p> <p>CBC understand the logic of this approach, with increased staff numbers meaning that the ratio of spaces to staff decreases over time. However, we remain unclear how the permanent loss of 1,150 staff spaces factors into this, as this would result in a significant loss of spaces, leaving 4,940 spaces to serve an increased number of staff. The loss of 1,150 spaces would seem less gradual than the 'reduction in spaces relative to staff over time' approach referred to in the Car Parking Strategy.</p> <p>CBC note that GAL is currently analysing the updated 2023 Staff Travel Survey. This would seem an important consideration that should be factored into any approach to staff parking proposed through the Project.</p>	<p>Our previous point remains - information should be provided detailing how the proposed loss of 1,150 staff spaces fits with there being an increase in the number of more staff due as a result of the project, and having regard to sustainable transport mode obligations.</p> <p>Detail should also be provided as to how the 2023 Staff Travel Survey has (or will) inform the approach to staff parking that is proposed in the Project. It is important that the most up-to-date evidence on staff travel is feeding into the DCO evidence base to help assess the scope for delivering the Surface Access Commitments.</p>	<p>High</p>
<p>120.</p>	<p>Passenger parking offer and pricing</p>	<p>The council had noted that it was unclear if GAL intends to offer a range of parking at different price levels – this is being important to ensure a balanced approach between supporting sustainable transport mode share and offering an appropriate range of on-airport parking for those who do need to drive (on-airport parking being more sustainable than off-airport parking).</p>	<p>The applicant should detail the range of parking products that will be retained following the reallocation of spaces, detailing how this fits with its wider sustainable mode share obligations.</p> <p>The Car Parking Strategy (and cross reference to the relevant SAC) confirms that GAL will continue to use dynamic pricing for</p>	<p>High, Addressed</p>

		<u>The Applicant submitted a Car Parking Strategy at Deadline 1. This provides further detail on the pricing strategy and use by the airport operator of dynamic pricing to balance supply and demand for parking across its range of parking products, outlining that pricing offers an important tool to influence the level of parking demand and thus the mode share of Park & Fly trips. Para 4.5.5 of the Car Parking Strategy explains that whilst GAL is not committing to implement a specific level of charge, it is committing to monitor the mode share trajectory and to use parking charges as one of the key influences in reaching its mode share commitments. This is also set out in the Surface Access Commitments.</u>	<u>passenger parking to ensure a balanced approach.</u>	
<u>13.</u>	<u>Permitted Development Rights</u>	<u>GAL has extensive permitted development rights which include the provision of parking, and the Council is concerned that there is no control through the DCO or proposed s106 agreement to prevent these being used to create an overprovision of parking in the future, undermining the surface access commitments.</u>	<u>It is considered that greater control is needed to ensure that permitted development rights do not result in an over-provision of on-airport passenger parking, undermining the meeting of SACs. This matter is subject to ongoing discussion through negotiation on the S106 agreement.</u>	<u>Uncertain</u>
<u>14.</u>	<u>Robotic parking as a baseline parking assumptions</u>	<u>Robotic Parking: Do not agree with the applicant's assumption that 2,500 robotic parking spaces can form part of the baseline. This would significantly increase parking capacity beyond the 100 space temporary three-month trial and would significantly increase parking capacity, the full highway impact of which would need to be properly assessed. The Applicant appears to be assuming that all 2,500 parking spaces can be taken as a given at this stage. However, this assumption is made some way in advance of individual Permitted Development Rights (PDR) consultations that GAL advise would be submitted in 2024/25/26. Given that each of those PDR consultations would be expected to be supported by sufficient evidence to demonstrate 'sufficient but no more parking' than is needed to ensure GAL's mode share obligations can be met, it is not considered appropriate for GAL to simply assume, without providing justification through evidence, that 2,500 robotic spaces coming forward through PDR can</u>	<u>The applicant should not be assuming for an increase of 2,500 passenger spaces through robotic parking in its baseline – this should form part of the DCO itself.</u> <u>The applicant should provide evidence to demonstrate that that the Hilton planning permission has been lawfully commenced if it is to be included within the parking baseline.</u>	Low

		<p><u>be considered as forming part of the baseline. It would be more appropriate if GAL were to include this parking as part of the DCO. This is discussed further at 17.68 and 17.69 of the West Sussex LIR.</u></p> <p><u>The parking baseline also includes a planning permission for 820 parking spaces at the Hilton Hotel, to be brought forward by the hotel operator. The permission expired on 5th March 2022, however the Applicant states that works are expected to recommence in 2023 or 2024. It has not been evidenced to CBC as the Local Planning Authority that the application has been lawfully commenced and therefore it cannot be relied upon as part of the baseline.</u></p>		
<u>15.</u>	<u>AAP-030 Environmental Statement Chapter 5 Project Description states that four hotels are proposed as part of the DCO.</u>	<u>The Authorities query whether the 4 hotels should be “Associated Development” – The Applicant has responded to this in the SoCG. The Applicant argues that this development supports operation of airport, reduces impacts and is subordinate, though the Authorities (particularly Crawley Borough Council) have concerns regarding the need to ensure that Control Documents include adequate controls on the provision of additional on-airport parking at hotels.</u>	<u>The Authorities’ view is that any such (i.e. hotel-related) parking should be operational parking only so as to support the Applicant’s Surface Access Commitments. This is particularly important as the hotels will, in due course, exist as commercial operations operated by other parties and so there is no reason that they should be exempt from the Local Planning Authorities wider policies in relation to car parking merely by virtue of their conception under the DCO for authorising consent.</u>	<u>Uncertain</u>
<u>16.</u>	<u>Commercial Floorspace</u>	<u>The Applicant’s response at Rows 5.3 and 5.24 of AS-060 appears to clarify that no parking is proposed for new offices through the Northern Runway Project. However, CBC consider that there would still need to be controls with regards to parking (to meet the Applicant’s Surface Access Commitments).</u>	<u>Controls are needed to ensure that any parking provision associated with office uses is consistent with meeting the Surface Access Commitments.</u>	<u>Uncertain</u>
<u>12.</u>	<u>Updated Staff Travel Survey</u>	<u>CBC note that GAL is currently analysing the has now received initial results from its updated 2023 staff travel survey and will share the results with CBC once available.</u>	<u>The most up-to-date evidence on staff travel should be feeding into the DCO evidence base to help assess the deliverability of the Surface Access Commitments.</u>	<u>High</u>

CBC/PADSS

PINS Reference TR020005



AIR QUALITY

Please note: For most air quality matters further information has been provided by the Applicant at Deadline 1, including a 567 page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed and means that Crawley Borough Council is unable to update the resolution status or otherwise on many of the air quality matters within the PADDs. This will be completed and submitted to the ExA at Deadline 3 and separately in further communications with the Applicant. This applies to all points herein for air quality.

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	Air Quality and Emissions Mitigation Guidance for Sussex	<p>The applicant has not clearly demonstrated regard to the Sussex Air Quality and Emissions Mitigation Guidance or the Defra air quality damage cost guidance in assessing air quality impacts and mitigation measures.</p> <p>The health/damage costs are not included in the DCO Documents despite confirmation from the applicant that they would be undertaking a TAC (Transport Analysis Guidance) assessment which would identify the air quality damage costs of the Project. The underlying rationale of the Sussex Guidance is to quantify health damage costs associated with the transport emissions from the proposed development (NO₂, PM_{10/2.5}) in order to offset these damages to protect human health. This approach is in line with the principals of Defra's Clean Air Strategy.</p> <p>The approach taken by the Applicant is not consistent with the principles of the Sussex Guidance, (local Policy ENV12) to address the impact of emissions from the</p>	<p>The TAG assessment identifying the air quality damage costs of the Project should be clearly presented in the application documents in order to help understand the effective and necessary mitigation needed to protect human health alongside supporting economic growth. Additional mitigation measures to address local air quality impacts, proportionate to damage costs of the scheme to be provided in accordance with the Sussex Guidance. The proposed mitigation to be provided through an Air Quality Action Plan secured by s.106 agreement, or a control document by Requirement in the Draft DCO.</p>	Uncertain

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		<u>development at a local level proportionate to the value of the damage to health.</u>		
2.	Air Quality Action Plan (AQAP)	<p>No AQAP has been provided which clearly sets out a range of measures to specifically address local air quality. Instead, the applicant has addressed air quality through the carbon action plan (CAP) and the airport surface access strategy (ASAS). This approach differs from discussions during 2 years of consultation where a draft AQAP was provided in the air quality TWG (21.10.22) and an AQAP was listed in item 19 of Schedule 2 (Requirements) of the draft DCO (28.04.23).</p> <p>The CAP and ASAS do not specifically or adequately address air quality mitigation measures based on health, and both lack the means to measure short-term exposure or provide monitoring to check compliance.</p> <p>CBC has concerns that the lack of a dedicated AQAP will undermine its ability to fulfil its own LAQM requirements and is not consistent with Defra's Air Quality Strategy.</p>	A combined operational air quality management plan should be provided which specifically focuses on local air quality, and which draws together measures aimed at local mitigation to reduce the health impacts from emissions, in addition to those outlined in the SAS and the CAP.	Uncertain
3.	Dust Management Plan (DMP)	No DMP has been provided which clearly sets out specific mitigation measures to ensure potential adverse impacts from construction dust are avoided during all construction stages.	The applicant proposes a DMP once detailed design plans are available. However, there is no reason why a DMP or outline DMP cannot be produced at this stage since construction compound locations and transport routes have been provided. A DMP is therefore requested for the examination, and to provide additional confidence in the control measures and monitoring for the construction phase.	Uncertain
4.	Construction Traffic Management Plan (CTMP)	Section 6.5 of the CTMP (Restrictions and Monitoring) identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full	Further details are requested during the examination on the proposed monitoring system and how this would protect air quality in Crawley's AQMA. More clarification is required regarding the additional traffic that would be expected in the future situation.	Uncertain

		CTMP. However, no details on this monitoring system are provided to help understand how this would protect air quality. It is also unclear if the plan takes into account additional traffic associated with the natural growth of airport traffic, or additional traffic growth associated with the additional capacity already created in the first phase of construction.		
5.	Operational Air Quality Monitoring	CBC has concerns regarding the measurement accuracy of the AQ Mesh low-cost sensors which the applicant is proposing to use to monitor operational phase impacts. AQ Mesh monitors are not approved by Defra for the monitoring of air quality in line with Local Air Quality Monitoring guidelines (equivalence reference method criteria for continuous monitoring) particularly with regards to short term level exceedances. As such they are not sufficient to demonstrate compliance with air quality standards. This introduces uncertainty on how air quality will be evaluated and reported to the council, which in turn reduces transparency on the effectiveness of measures relied upon to improve air quality.	Further information is requested to understand how air quality will be monitored, evaluated and reported to local authorities, along with the further steps that would be taken should air quality exceed short term limits or deteriorate further than predicted. CBC would welcome a commitment from the applicant to use monitoring equipment that meets the equivalence reference method.	Uncertain
6.	Funding for Local Ambient Air Quality Monitoring	The ES does not specifically identify which of the existing LA continuous air quality monitoring stations on and around the airport will be funded. The LAQM process requires a LA with a major airport in its district to carry out an assessment of sensitive receptors within 1000m of the airport. Therefore CBC has an air quality monitoring station located on the eastern perimeter of the airport to provide independently measured pollution data for this assessment for Crawley residents living close to the airport who are impacted by airport emissions.	Further clarification is requested on funding of the LA monitoring stations on and around the airport.	Uncertain

7.	Uncertainty Surface Access Commitments and Controlled Growth	<p>There is insufficient information and a lack of sensitivity testing to clearly demonstrate how differing levels of modal shift attainment could impact future air quality predictions.</p> <p>CBC has concerns over whether the modal shift can be achieved, and if this is not achieved what the air quality effects may be.</p> <p>CBC continues to have concerns that there are no effective control measures in place to restrict growth if mode share targets are not achieved. Air quality impacts have been calculated based on the Applicants target surface access parameters, if these targets are not achieved then the predicted air quality and emissions impacts for the Project will be under reported.</p>	<p>Further information is needed to understand how reliant on modal shift assumptions future air quality predictions are. Further information on the performance indicators to deliver against targets, and how the monitoring strategy should be linked to controls if modal shift targets aren't met.</p> <p>To ensure that surface access commitments are met for mode share, and that air quality is not compromised by unchecked traffic growth, CBC consider that a controlled growth approach, which would restrict growth until mode share targets for surface access are met, should be adopted by the Applicant.</p>	Uncertain
8.	Assessment Scenarios (including 2047 Full Capacity)	<p>The scenarios assessed in Chapter 13 of the ES (Listed para 13.5.23) do not provide a realistic worst-case assessment. This is particularly the case for those scenarios where both construction and operational activities are underway at the same time, but the assessment has treated them separately.</p> <p>The same concerns apply to the emissions ceiling calculations as to how realistic these are, particularly when there are construction and operational activities ongoing, and the emissions ceiling calculations treat these separately.</p> <p>In addition, there is no operational assessment for the final full-capacity assessment year of 2047, as per ANPS (para 5.33) which identifies the need to include assessment when at full capacity.</p>	<p>Clarification is required as to how the selection of assessment years and their configuration re operational and construction was made and how this aligns with the requirements of the ANPS.</p> <p>A modelled assessment for the final full-capacity assessment year of 2047 is requested.</p>	Uncertain
9.	Ultrafine Particles (UFPs)	<p>The discussion on the health impacts of ultrafine particles (UFPs) from aviation sources within the ES (Chapter 18 para</p>	<p>CBC would welcome further investigation into the impact of UFPs in the local area, through ongoing monitoring around the airport to help</p>	Uncertain

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		18.8.66) is welcomed. However, although the applicant supports the monitoring of UFPs and commits to participating in national industry body studies of UFP emissions at airports, it is unclear if their commitments extend to supporting a local monitoring study.	support the case for reducing emissions in line with GALs sustainability statement and protecting health in line with Defra's Clean Air Strategy.	
10.	CARE Facility	There were continuous issues with odour from the current small waste incineration plant at the CARE facility until it was "mothballed" in 2020. The odour was mainly associated with the biomass fuel which produced a sweet-smelling aromatic hydrocarbon odour. There are concerns that this may be repeated at the new CARE facility which proposes to double in size.	Further clarification is requested on the type and size of incinerators that are proposed and how odour will be controlled. Information is requested on what steps have been taken to address inadequacies with the current odour control technology to ensure odour will not be a factor in the new facility.	Uncertain
11.	Technical Details	There are concerns that a realistic worst case has not been assessed due to insufficient information or clarity on a range of technical details in the ES and associated documents, including how modelled work using ADMS/ADMS Airports is presented.	Further information is requested on rates of future air quality improvement, pollutants assessed, construction plant (asphalt plant numbers of modelled concrete batching plants), heating plant and road traffic modelling to help understand if the worst case has been assessed. Further information is requested on the large numbers of air quality monitors excluded from the assessment and why a more up to date baseline year of 2022 was not used compared to the 2018 year utilised (using 2016 extrapolated traffic data).	Uncertain

NOISE AND VIBRATION

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Legislation, policy and guidance				
1.	Local planning policies	Local planning policies are covered in Table 14.2.2 but no information is provided on how these policies are addressed in the ES.	Details should be provided on how local planning policies are addressed in the ES.	High
Assessment of significant effects – Construction Noise				
2-	Assessment periods	Table are provided for daytime and night time construction noise predictions. However, no identification of evening construction works has been provided.	Details of any evening works should be provided This has now been addressed. GAL have confirmed that all evening works are also likely at night and have been assessed at night as a worst case	High Addressed All evening works are also likely at night and have been assessed at night as a worst case
Assessment of significant effects – Construction Vibration				
3.	Assessment of vibration effects from road construction	The construction vibration assessment only considers effects from sheet piling and does not consider vibration effects from vibratory	Vibration effects from vibratory compactors and rollers used in highway works should be assessed	High

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		compactors and rollers used in highway construction.		
Assessment of significant effects – Air Noise				
4.	No assessment criteria is provided for the assessment of effects on non-residential receptors	Assessment criteria based around the LOAEL and SOAEL focuses on noise effects at residential receptors. Non-residential receptors should be considered on a case-by-case basis with assessment criteria defined depending on the non-residential use.	Provide an assessment of likely significant air noise effects on non-residential receptors.	High
5.	Only 2032 assessment year is assessed as a worst-case	The assessment of air noise only covers 2032 as it is identified as the worst-case; however, identification of significant effects for all assessment years should be provided.	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Uncertain
6.	No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary LAmax, overflight, Lden and Lnight noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.	Provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant identifying a likely significant effect.	Uncertain
7.	No details of the noise modelling or validation process are provided. No details of measured Single Event Level or LASmax noise data from the Noise-Track-Keeping are provided	It is difficult to have any confidence in the noise model without any provision of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours. Measured Single Event Level and LASmax noise data should be provided for individual aircraft variants as it is key information used when defining the aircraft noise baseline.	Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided. This should include Single Event Level and LASmax noise data for individual aircraft variants at each monitoring validation -location <u>used for validation</u> .	Uncertain
Assessment of significant effects – Ground Noise				
8.	The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment. It is not clear	Higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience	An assessment of Slower Transition Case ground noise effects should be provided to identify the potential for exceedances of the SOAEL at sensitive receptors.	High

	<p>why 2032 is considered worst-case for ground noise. Ground noise contours are not provided.</p>	<p>significant noise effects that are identified in the Central Case assessment. Whilst 2032 provides the highest absolute noise levels, there appears to be larger increases in noise <u>as a result of the proposed development</u> at some receptors during other assessment years. Noise contours have been provided for aircraft noise and road traffic noise, but no noise contours are provided for ground noise. These contour plots should be provided to allow better understanding of ground noise effects for each assessment year and scenario. It would be expected that LAeq and LMax contour plots are provided.</p>	<p>Likely significant effects for all assessment years should be identified in the ground noise assessment. Provide LAeq and LMax noise contour plots to supplement the ground noise assessment. Contour plots should be provided for Do-minimum and Do-something scenarios for each assessment year.</p>	
Assessment of significant effects – Road Traffic Noise				
9.	Noise monitoring duration	<p>One 20-minute survey and one 10-minute survey is not sufficient to provide data suitable for validation of the road traffic noise model and indeed these data are not used as such. There is therefore no validation of the road traffic noise model in terms of measured levels.</p>	<p>Longer term monitoring, close to the A23 or M23 where road traffic noise can be said to dominate over aircraft noise, would be preferable. Alternatively, the applicant could explain what steps they have taken to independently validate the road traffic noise calculations.</p>	Uncertain
The Noise Envelope				
10.	Sharing the benefits	<p>Paragraph 14.2.44 – sharing the benefits has been removed from the ES. This is a fundamental part of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities. There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the Noise Envelope allows for an increase in noise contour area on opening of the Northern Runway. The Applicant wants flexibility to increase noise contour area limits depending on airspace</p>	<p>Details on how noise benefits are shared should be provided in accordance with policy requirements set out in the Aviation Policy Framework. Noise contour area limits should be based on the Central Case. There should be no allowance for the Noise Envelope limits to increase</p>	Uncertain

		redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope.		
11.	CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for host authorities to review Noise Envelope reporting or take action against limit breaches or review any aspect_s of the Noise Envelope.	A mechanism should be included to allow the host authorities to scrutinise noise envelope reporting and take action in the case of any breaches	Uncertain
12.	Prevention of breaches	A breach would be identified for the preceding year, with an action plan in place for the following year. Consequently, it would be two years after a breach before a plan to reduce the contour area would be in place. No details are provided on what kind of actions are proposed for an action plan to achieve compliance. 24 months of breach would be required before capacity declaration restrictions for the following were adopted so it would be three years after the initial breach before capacity restrictions were in place. Capacity restrictions would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year.	More forward-planning needs to be adopted to ensure that action plans are in place before a breach of the noise contour area limit occurs. Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the noise envelope. Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation	Uncertain
Noise Mitigation				
13.	<u>Securing of noise mitigation measures and noise limits, including timing of implementation</u>	<u>No clear mechanism is provided for how noise mitigation measures and some noise limits (e.g. plant noise limits) are to be secured. The timing of implementation of such mitigation measures is also important and needs to be appropriately secured. This is important to ensure that new mitigation measures are installed in advance of</u>	<u>Details of how mitigation measures detailed in the assessments are to be secured should be provided.</u> <u>This should include details of the timing when each such mitigation measure will be installed and how this timing is secured.</u>	Uncertain

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		<u>increased activity, changes in operations, or removal of any existing mitigation measures.</u>	<u>Where new mitigation measures are being proposed to replace existing measures which are to be removed, an assessment of predicted noise levels and likely impacts during any intermediate phase during the works should be provided.</u>	
Noise Insulation Scheme				
143.	Noise insulation scheme details	<p>How would the noise insulation scheme prioritise properties for provision of insulation. Residents of properties within the inner zone will be notified within 6 months of commencement of works; however, it is not clear what noise contours eligibility would be based upon.</p> <p>Is noise insulation in the Outer Zone restricted to ventilators or will the occupier have flexibility to make alternative insulation improvements? Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings (e.g. care homes, places of worship, village halls, hospitals etc.) would be eligible for noise insulation.</p> <p>It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.</p>	<p>Provide details on how the scheme would roll out. Clarify what noise contours would be used to define eligibility.</p> <p>Clarify on the flexibility of the noise insulation scheme.</p> <p>Provide details on what community buildings would be eligible for noise insulation and what level of insulation would be provided.</p> <p>Provide details on how monitoring of ground noise would be undertaken and how a property would be identified as appropriate for monitoring of ground noise.</p>	Uncertain.

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CARBON AND GREENHOUSE GASES

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Legislation, policy and guidance				
1. Environmental Statement Chapter 15 Climate Change	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/CORISA.	It's not clear if the Applicant considers in aviation forecasts used to develop the 'need case' of the impact of ETS/CORISA.	Can the Applicant please confirm in the need case for the scheme if it considered the impact of ETS/CORISA?	High
2-	<u>UK Climate Change Committee (CCC) Progress in reducing emissions report, published in June 2023.</u>	<u>The Climate Change Committee (CCC) plays a crucial role in monitoring the UK's progress towards its legally binding carbon budgets and emissions reduction targets under the Climate Change Act 2008. The latest CCC Progress Report (2023) identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero. See Page 267, 'Airport expansion' bullet point of the latest report.</u>	<u>The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory.</u>	<u>HighAddressed</u>
Baseline Information review				
3.	GHG emissions from airport buildings and ground operations in the ES [TR020005] (Table 16.4.1) does not appear to include maintenance, repair, replacement or refurbishment emissions.	The scope of the GHG emissions from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment emissions. This would under account operational GHG emissions. It is not clear what is captured under "other associated businesses".	<u>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%. The Applicant needs to clarify if maintenance, repair, replacement or refurbishment emissions were calculated and, if not, justify why. Can you please explain</u>	High

			what emission sources are defined under "other associated businesses".	
Assessment of significant effects				
4-	The ES [TR020005] fails to consider the risks raised by the CCC's expert advisory panel, which warns that the UK jet zero policy is non-compliant with the UK's net zero trajectory. Therefore, the conclusion of ES is not in alignment with the IEMA (2022) GHG Assessment Guidance.	<p>The CCC, in their latest progress in reducing emissions publication (June 2023) and previous publications, raised serious concerns over the UK Jet Zero policy as summarised in Page 267, 'Airport expansion' bullet point of the latest report.</p> <p>The GHG aviation methodology has resulted in a lack of transparency with regard to the emissions relative to the without Project Scenario since by 2047, there will be an increase of around 60,922 Annual Aircraft Movements as presented in Table 3.7.1 of the ES [TR020005]. The GHG Assessment conceals the emissions by applying emissions reductions from the Jet Zero High Ambition scenario.</p> <p>Therefore, based on the 'high risk' of the Jet Zero High Ambition Scenario not being achieved, emissions from the Project will be significantly higher than the baseline scenario. Hence, based on the advice from the CCC, it would suggest that the expansion of the GAL airport and increase in demand is not in line with the UK's net zero trajectory.</p>	The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).	AddressedHigh
5-	In the Cumulative Effects Section 16.10 of the ES [TR020005], no assessment of cumulative UK airport expansion emissions has been considered on how this will impact the UK's net zero trajectory.	The UK's eight biggest airports plan to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels. This Figure is not up to date as Gatwick is proposing to increase its operating capacity to 80.2 million passengers per annum, which would make the total Figure >150 million more	The Applicant needs to provide an updated cumulative assessment that considers the combined impact of all major UK airport expansions and how this could impact the UK's net zero trajectory in alignment with the IEMA GHG Assessment Guidance (2022).	AddressedHigh

		<p>passengers a year by 2050 relative to 2019 levels.</p> <p>As discussed above, airport expansion, demand management, and reliance on nascent technology are three key areas raised by the CCC that could jeopardise the UK's net zero trajectory. A significant increase of > 150 million passengers will greatly increase the UK's cumulative aviation emissions, which may have significant consequences on the UK's net zero trajectory.</p>		
Conclusions				
6.	<p>No consideration is provided in the ES around the risk of the Jet Zero Strategy and the impact this would have on the significance of the assessment.</p>	<p>Group for Action on Leeds Bradford Airport and Possible submitted a judicial review in October 2022 of the UK Aviation Jet Zero strategy. The CCC has consistently stated that the Government needs to "implement a policy to manage aviation demand as soon as possible". The GHG Assessment does not acknowledge any of these concerns and risks of the Jet Zero strategy, which the GHG Assessment hinges on.</p>	<p>The Applicant needs to consider the issues raised in the UK Aviation Jet Zero strategy's judicial review and the CCC's concerns. Please reflect on how these concerns could impact the UK's net zero trajectory.</p>	AddressedHigh
7.	<p>Summary</p>	<p>In summary, the GHG Assessment fails to consider the risks of the Jet Zero Aviation Policy and how this could compromise the UK's net zero trajectory in alignment with the concerns raised to the UK Government by the CCC and in the judicial review. Additionally, the GHG Assessment does not assess the cumulative impact of the Project in the context of the eight of the biggest UK airports planning to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels.</p>	<p>The Applicant needs to address the comments raised above and update the GHG Assessment to adequately consider the risk of the UK Aviation Jet Zero strategy and the cumulative impact of the Project.</p>	AddressedHigh

8.5.3 Environmental Statement - Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions	It is not clear if carbon calculations were carried out during the construction lifecycle stage in the ES [TR020005] for well-to-tank (WTT) emissions.	Excluding WTT is non-compliant with the GHG Protocol Corporate Accounting Standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. This also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24.	<p><u>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES [Chapter 16 of the ES, APP-041].</u></p> <p><u>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%. The Applicant needs to update the GHG Construction assessment to account for WTT emissions.</u></p>	High
9.	The RICS distances were referenced in Table 4.1.1 of the ES [TR020005] for the average material haulage distances. However, the RICS transport distances were not applied comprehensively.	Currently, only 100km was considered for construction-related A4 emissions, which is not in alignment with the recommended RICS transport distances. Furthermore, no global shipping emissions were considered as part of the GHG assessment, which is not in alignment with the RICS global transport scenario. This therefore under accounts the construction transport emissions.	<p><u>The Applicant needs to update the transport assessment in compliance with the RICS methodology quoted in the ES to ensure shipping transport emissions are accounted for. This can then be used to inform appropriate transport efficiency mitigation measures as part of the CAP under Appendix 5.4.2 in the ES [APP-091]. The Applicant needs to conduct a comprehensive transport assessment in alignment with the RICS transport distances[†]</u></p>	High
10.5.3 Environmental Statement - Appendix 16.9.2 Assessment of	In Table 2.1.1 it is confirmed that the carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology [TR020005] in Section 16.4.18). This also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24	<p><u>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%. The Applicant needs to update the GHG</u></p>	High

[†] <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/building-surveying-standards/whole-life-carbon-assessment-for-the-built-environment>

Greenhouse Gas Emissions for Airport Buildings and Ground Operations (ABAGO)			ABAGO assessment to account for WTT emissions.	
11.	In Section 1.2.1, it is not clear if carbon calculations are carried out for maintenance, repair, replacement or refurbishment emissions.	Maintenance, repair, replacement or refurbishment emissions are not indicated to be scoped in the GHG ABAGO assessment. These emission sources could potentially account for a significant portion of the ABAGO emissions.	<u>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%. The Applicant needs to provide a justification for why these were not calculated within the GHG ABAGO Assessment.</u>	High
12. 5.3 Environmental Statement - Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions	It is not clear how or if Applicant converted CO₂ emissions from aircraft to CO₂e.	It is not clear if the Applicant undertook a conversion from CO₂ to CO₂e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023). Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO₂e in 2028 in the most carbon-intensive year where 5.327 MtCO₂e was estimated to be released (Table 5.2.1).	Can the Applicant please confirm if a conversion was undertaken from CO₂ to CO₂e? If not, the Applicant is required to update the GHG Aviation Assessment to account for this.	High Addressed
14.	In Aviation methodology well-to-tank (WTT) emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24. This would result in an underestimation of the GHG emissions associated with aviation	<u>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES [Chapter 16 of the ES, APP-041].</u> <u>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and</u>	High

		since a 20.77% (BEIS, 2023 ²) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO ₂ e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	<u>where all such exclusions total a maximum of 5%. Can the Applicant please confirm if WTT was applied to the Aviation GHG assessment? If it was not, the Applicant is required to update the GHG assessment to account for WTT emissions.</u>	
14	<u>GAL does not identify the risks associated with using carbon offset schemes.</u>	<p><u>Document 5.4.2, Section 1.14</u></p> <p><u>This states that, "In 2016/17, we achieved 'Level 3+ - Neutrality' status under the Airport Carbon Accreditation scheme, which is a global carbon management certification programme for airports (Ref 1.1). GAL has been working hard to reduce carbon emissions under GAL's control (from a 1990 baseline) and offset the remaining emissions using internationally recognised offset schemes."</u></p> <p><u>The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme.</u></p>	<p><u>GAL should state if they comply with the Airport Carbon Accreditation Offset Guidance Document which specifies the type of offsetting Schemes that need to be used.</u></p> <p><u>In addition, and where reasonably practical, GAL should seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be:</u></p> <ul style="list-style-type: none"> <u>o additional in that would not have occurred in the absence of the project</u> <u>o monitored, reported and verified</u> <u>o permanent and irreversible</u> <u>o without leakage in that they don't increase emissions outside of the proposed development</u> <u>o Have a robust accounting system to avoid double counting and</u> <u>o Be without negative environmental or social externalities.</u> 	High

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² <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

<p>15</p>	<p><u>The unsustainable growth of airport operations may result in significant adverse impacts to the climate.</u></p>	<p><u>The increased demand in GAL's services may lead to unsustainable surface access transportation and airport operation growth, which may significantly impact the climate.</u></p>	<p><u>To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism.</u></p> <p><u>In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be:</u></p> <ul style="list-style-type: none"> <u>o additional in that would not have occurred in the absence of the project</u> 	<p><u>Uncertain</u></p>

			<ul style="list-style-type: none"> o <u>monitored, reported and verified</u> o <u>permanent and irreversible</u> o <u>without leakage in that they don't increase emissions outside of the proposed development</u> o <u>Have a robust accounting system to avoid double counting and</u> o <u>Be without negative environmental or social externalities.</u> 	
16	<p><u>If the Applicant does not provide infrastructure or services to help decarbonise surface transport emissions it may have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified</u></p>	<p><u>The Applicant must actively promote the transition to a decarbonised economy, incentivising airport users to adopt low-carbon technologies like electric cars and public transportation systems.</u></p>	<p><u>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure.</u></p> <p><u>Additionally, to support this movement, the Applicant should support a Green Bus Programme such as the expansion of the network of hydrogen buses used in the Gatwick/Crawley area into Mid Sussex with accompanying Infrastructure.</u></p>	<p><u>Uncertain</u></p>

CLIMATE CHANGE

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Baseline Information review				
1- Environmental Statement Chapter 15 Climate Change	Time periods considered for climate change projections are not far enough into the future to represent the worst case scenario.	The most distant time period chosen for assessment was 2040-2060 (2060s) (paragraph 15.5.2 of ES Chapter 15 Climate Change), however, some asset components are assumed to be operational in perpetuity. These climate change projections are not adequately far enough into the future to represent the worst case scenario.	The Applicant should collect additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are accounted for. Data available includes: <ul style="list-style-type: none"> • PPCE (Probabilistic Projections of Climate Extremes) for future climate extremes – available between 1961 and 2100. • Probabilistic projections (25km) – up to 2070-2099 (2080s) is available. 	<u>AddressedHigh</u>
Assessment of significant effects				
2-	Identification of construction risks is limited.	Construction risks identified (refer Table 15.8.5 of ES Chapter 15 Climate Change) are limited and could be addressed in more detail e.g. flooding of site or construction compounds causing health and safety issues, damage to equipment and/or impacts to the construction programme and resulting cost increases.	The Applicant should undertake a more detailed identification and assessment of construction related climate risks and distinguish areas that are particularly vulnerable and may require specific adaptation measures to be in place.	<u>AddressedUncertain.</u>
3-	Inconsistency and lack of detail in some climate impact statements.	The climate impact statements (Table 15.8.5 and Table 15.8.6 of ES Chapter 15 Climate Change) are lacking in consistency in that some are missing an 'impact'. They have a cause, an 'event' but no end 'impact'. This end result is what should determine the consequence rating and could have led to an underestimation of risk.	The Applicant should update all climate impacts statements to have a clear end impact so that all risks are articulated in a consistent way.	<u>AddressedUncertain.</u>
Mitigation, enhancement and monitoring				

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4.	Lack of identification of additional mitigation / adaptation measures.	Whilst the Applicant may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures should be noted and communicated with an indication of who is responsible and timing. For example, Appendix 5.3.2 lists a number of 'options for climate resilience measures' which should also be included in this report.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change.	Addressed Uncertain
Mitigation, enhancement and monitoring				
5. 5.3 Environmental Statement - Appendix 15.5.2 Urban Heat Island Assessment	Mitigation measures should be proposed to reduce the impact of UHI effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that that project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect. <u>Updated position (Deadline 1 SoCG): It is acknowledged that the Applicant will monitor UHI. It's also recommended that where feasible and appropriate additional UHI mitigation measures are incorporated.</u>	Uncertain Uncertain Addressed
Assessment of significant effects				
6. 5.3 Environmental Statement - Appendix 15.8.1 Climate Change Resilience Assessment	Inconsistency and lack of detail in some climate impact statements.	The impact statements are lacking in consistency in that some are missing an 'impact'. They have a cause and an 'event' but no end 'impact'. This end result is what should determine the consequence rating and may be why no risks are rated higher than a medium.	The Applicant should update all climate impacts statements to have a clear end impact for consistency. The risk ratings should then be revised accordingly.	Addressed Uncertain.
7.	Identification of construction risks is limited.	Construction risks identified are limited and could be addressed in more detail e.g. flooding of site causing health and safety issues, damage to equipment	The Applicant should undertake a more detailed identification and assessment of construction related climate risks.	Addressed Uncertain.

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		and/or construction programme impacts and resulting cost increases.		
8.	Concerns regarding underestimation of risk.	Regarding Risk 7, there is a concern that the impacts could be more severe than just delays in fuelling i.e. reaching flashpoint of aviation fuel on extreme hot days could lead to combustion. Also given it has been suggested that there may be hydrogen usage for low emissions vehicles during construction and potentially hydrogen storage / fuelling capabilities during operation, the climate risk around this should be more thoroughly explored.	The Applicant should review the articulation of risk, impact and risk rating and revise where appropriate. Further consideration should be given to climate risks associated with hydrogen storage and usage.	Uncertain Addressed
9.	Lack of identification of additional mitigation / adaptation measures. (Same concern as with the main report i.e. Chapter 15 Climate Change)	Whilst the Applicant may not have assessed any risks as 'significant', the identification of further mitigation or adaptation measures is an omission in the report. Further adaptation measures e.g. design decisions or operational management measures to increase resilience should be noted and communicated with an indication of who is responsible and timing of implementation.	It is acknowledged that the Applicant has outlined mitigation and adaptation measures for the project in the report and appendices, in addition to referencing existing policies and plans in place at GAL. These embedded measures referenced as addressing the identified impacts are secured in the Code of Construction Practice and the DAS (both Schedule 12 documents) which is deemed sufficient. The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change. Where these are included in the report, DCO, or Control Docs will need to show how these are to be secured, delivered & maintained. Updated position (Deadline 1): Whilst, it is acknowledged that the Applicant has outlined mitigation and adaptation measures for the project in the report	Uncertain Addressed Addressed Uncertain

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			and appendixes, in addition to referencing existing policies and plans in place at GAL, the DAS only includes indicative climate resilience design principles which are not reflected in the Control Document. Appendix 1 of the DAS.	
10.	Lack of consideration of storm events.	Storm events are not considered sufficiently in this assessment. Risk 21 could be extended to include storm events (i.e. extreme rainfall, thunder, lightning and wind), resulting in delays to aircraft take-off and landing. Furthermore, we suggest the likelihood rating is too low and the description of 'As likely as not' is more appropriate. Evidence of this risk already occurring this year can be found online: https://www.bbc.com/news/uk-england-sussex-65875840	The Applicant should further consider storm events and risk description with rating to be revised.	Addressed High
11.	Lack of consideration of wildfire	Wildfire is not mentioned as a possible climate hazard impacting the airport's operation. Wildfires in the surrounding area, in particular the smoke they generate, can impact airport operations, e.g. flights can be delayed, or certain planes may have to be diverted. Refer to following incident: https://www.express.co.uk/news/uk/1653913/Gatwick-airport-fire-smoke-runway-flights-wildfire-heatwave-drought	The Applicant should consider the risks associated with wildfire & associated smoke.	High – it understood further information is to be proved by the Applicant to address this detail. This has not yet been received.
12.	Lack of consideration of fog	Risks associated with fog were not included in the risk assessment. Fog can impact visibility and the ability to perform day to day airport operations. Adequate consideration should be given to this in the risk assessment.	The Applicant should undertake further research to gain clarity around how fog may change in the future as a result of climate change and give further consideration to its risks.	High - it is understood further information is to be provided by the Applicant to address this detail. This has not yet been received
13.	Insufficient detail on the climate change impact on critical airport equipment and infrastructure.	Consideration to be given to how climate change could impact critical equipment and infrastructure e.g. power, telecommunications as well as the embedded	The Applicant should include risk and mitigation details regarding the climate	Addressed High

		and additional mitigations to reduce this risk. For example, flooding or storm events impact critical power equipment causing a power outage. What redundancy is in place for this?	change impact on critical airport equipment and infrastructure.	
Assessment of significant effects				
14. 5.1 ES Chapter 20 Cumulative Effects and Inter- Relationships	Disagree with the assessment that 'cumulative effects are not relevant'.	We understand that a conclusion may be drawn that cumulative impacts from nearby projects may be 'insignificant', but we disagree with the statement that 'An assessment of cumulative effects is not relevant'. For example, nearby projects could exacerbate the urban heat island impact of the project or increase the impact of flooding to the site or access to the site.	The assessment should be reconsidered and reworded to reflect that it is not irrelevant.	<u>Addressed</u> High

LOCAL ECONOMIC AND SOCIO-ECONOMIC IMPACTS

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Environmental Statement Chapter 17: Socio-Economics				
4.	Incomplete consideration of local planning policies.	The review of policies is considered incomplete (only three adopted policies identified for Crawley and limited analysis of how the Project aligns with these. No analysis of some of the potential constraints brought about by the Project on Crawley.	The Applicant should include a full list of adopted and emerging policies and provide a more detailed analysis of how the project aligns with local policy and strategy. Consideration of some of the potential constraints brought about by the project on Crawley should also be included.	High
Assessment Methodology				
12.	Confirmation on projects which informed methodological approach	Paragraph 17.4.2 states that the methodology has been based on accepted industry practice, a review of socio-economic assessments for other relevant projects including other airport or significant infrastructure schemes, and feedback received by PINS and local authorities during the consultation process.	The Applicant should clarify which relevant projects were drawn upon, setting out why they are relevant, to inform the development of the methodology for this assessment.	High
32.	No consideration of effects at a Crawley borough level.	Despite being raised as a gap in the assessment at several Socio-economic Topic Working Group meetings, there is still no <u>qualitative</u> assessment of effects undertaken at a local authority level. The impacts of the project on key variables such as employment, labour market, housing (including affordable), <u>social infrastructure</u> and temporary accommodation need to be assessed given they affect both functioning and decision making at the local level.	The Applicant should undertake an assessment of project impacts on each local authority located within the Northern West Sussex Functional Economic Market Area (FEMA), <u>providing a commentary</u> to adequately <u>understand-explain</u> the extent of impacts at a local level.	Low
34.	Assessment of impacts on property prices	An assessment of project impact on property values has been scoped out of the assessment despite PINS advice on the issue (PINS ID 4.10.3). Unless subsequently agreed otherwise by PINS, an assessment of project impacts on property prices is still required.	At the minimum, the Applicant should undertake a qualitative assessment which robustly assesses the project's impacts on property prices.	Low

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45.	Clarification on use of pre-Covid data	Paragraph 17.4.14 states that 2019 data was primarily used given concerns with the Covid pandemic potentially affecting baseline data. However, this is a confusing message given some of the data sources used are post Covid and it is not clear why the Applicant has applied this approach.	The Applicant should source up-to-date data to inform the socio-economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	High
56.	Magnitude of impacts definition	Paragraph 17.4.25 presents tables defining the scale of magnitude of impacts for construction and operational periods of the project. The use of numbers and percentages to quantify impact can be challenging especially given all study areas are different and can be influenced by a number of different factors. It is not clear how these the ranges were defined to inform the assessment.	The Applicant should review these numbers to determine their appropriateness given the study areas for the project. The Applicant should also provide the rationale for the job ranges provided.	Low
76.	Use of up-to-date information sources	Paragraph 17.5.1 states that data from the 2021 Census is currently being released and this has been used where available at the relevant spatial scale. On this basis, the baseline assessment presented in section 17.6 comprises the most up-to-date position at the time of writing.	The Applicant should source up-to-date data to inform the socio-economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	High
78.	Consideration of worst-case scenario for employment benefit	Paragraph 17.5.5 states that the construction assessment presented in Section 17.9 focuses on the project's potential maximum effects. Whilst it is important to consider the maximum scale of impacts in terms of potential implications on local areas, it is also important to present a worst-case scenario in terms of employment benefit.	The Applicant should clarify whether they have estimated a worst-case scenario for numbers of construction workers.	Low
98.	Workplace earnings trends and impact on affordability	Workplace earnings are shown to be growing at a higher rate than resident earnings and it is implied this may lead to less out-commuting. This trend could impact the affordability ratio, which would have implications elsewhere in the socio-economic evidence, for example, assumptions on future housing growth and demand for affordable housing.	The assumption needs to be evidenced. This should include a trend analysis as well as consideration of likely variances at a local authority level.	Low
10.	Approach to population growth projections	Population projections show a population increase of nearly 15,000 (or nearly 6,000 homes assuming an occupancy ratio of 2.5). This does not provide a realistic assessment of the population growth likely to occur in this area. There is no sense check of deliverability of these projections against development constraints in Crawley and constraints in other areas such as the flightpath and green belt designation.	The Applicant should undertake an assessment of the likelihood of this level of growth within the LSA, taking into consideration the constraints on local housing development.	Low

944.	Assessment of sensitivity of receptors	Paragraph 17.6.121 presents a table setting out sensitivity of receptors. We question the sensitivity grading for employment and supply chain impacts, labour market impacts, disruption of existing resident activities, housing supply in the HMAs relevant to LSA and FEMA, community facilities and services . The sensitivity gradings should be revisited for these receptors.	The Applicant should revisit the sensitivity gradings for identified receptors.	Low
Assessment of significant effects				
102.	Assessment of construction effects	Assessment of labour market effects, effects on temporary accommodation, effects on community facilities, and effects on employment during construction need to be revisited. Concerns have been raised about the sensitivity of these effects. The magnitude of effects on construction employment for all study areas is also questioned, and magnitude of labour market effects based on magnitude criteria being used. There are also potential data limitations in relation to construction employment calculations as outlined in the review of Appendix 17.9.1. The Applicant hasn't undertaken any assessment at local authority level which is considered essential given existing constraints on labour supply in Crawley .	The Applicant should revisit this assessment based on the comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA, <u>providing a qualitative commentary to explain the implications rather than just signposting to numeric tables.</u>	Low
113.	Assessment of construction effects during the first year of operation	Assessment of construction effects during the first year of operation (including labour market effects, effects on population, effects on temporary accommodation, construction noise impacts on residents, effects on community facilities, and effects on construction employment) need to be revisited. The magnitude score of 'high' for all study areas is questioned. <u>Whilst there should be positive employment impacts during the construction phase, any positive economic impacts must be considered alongside related impacts, some of which are negative or uncertain. The number of construction jobs would appear unlikely to have a significant beneficial effect in the FEMA and LMA.</u> It should also be noted that the construction jobs calculation appears to be based on a "maximum" scenario. The Applicant hasn't undertaken any assessment at local authority level.	The Applicant should revisit this assessment based on the comments. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA, <u>providing a qualitative commentary to explain the implications rather than just signposting to numeric tables.</u>	Low
124.	Operational effects	Assessment of operational labour market effects, effects on affordable housing, population and	The Applicant should revisit this assessment based on the	Low

		<p>community facilities and services needs to be revisited. We have outlined our concerns above in relation to the magnitude criteria being used for this assessment and the sensitivity grading of this receptor for the LMA and FEMA. The Applicant also hasn't undertaken any assessment at local authority level.</p>	<p>comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA, <u>providing a qualitative commentary to explain the implications rather than just signposting to numeric tables.</u></p>	
135.	<p>AAP-030 Environmental Statement Chapter 5 Project Description states that four hotels are proposed as part of the DCO.</p> <p><u>Commercial Floorspace</u></p>	<p>Whilst Gatwick Airport represents a sustainable location for hotels, hotels are not defined as an operational use. This raises the question as to whether the proposed hotels can be considered as part of the DCO.</p> <p><u>As with hotels, the council seeks clarity as to why commercial space is considered to fall with the scope of the DCO regime and would expect the use of this space to be restricted to airport-related employment uses only.</u></p> <p><u>In the SoCG, GAL advise that this point is addressed at Row 19.54 of Table 19 Project General Mitigation. CBC cannot see a Row 19.54 on Table 19 Project General Mitigation of the Update on the Development of Local Authority Issues Trackers (Ref AS-060). The Applicant's response at Row 3.86 of that document confirms that one office block is proposed, principally to replace lost airport-related office space at Destinations Place. Airport-related office use would appear to fall within the definition of associated development, but the Applicant's use of the word 'principally' appears to leave open the possibility that some of the space may be non-airport related.</u></p>	<p>The applicant should provide justification detailing why proposals for new hotels are considered to fall within the scope of the DCO.</p> <p><u>Applicant to check if the Table 19 Row 19.54 reference is correct as CBC cannot find this.</u></p> <p><u>Applicant to clarify if proposed office floorspace is to be used for airport-related use only (with controls in place to ensure this).</u></p>	Uncertain
146.	<p>Application of assessment issues across all scenarios</p>	<p>With regards to the sections on other scenarios:</p> <ol style="list-style-type: none"> (1) Interim Assessment Year: 2032 (Paragraphs 17.9.80-17.9.119) (2) Design Year: 2038 (Paragraphs 17.9.120-17.9.142) (3) Long Term Forecast: 2047 (Paragraphs 17.9.143-17.9.165) <p><u>All of the construction (where applicable) and operational phase assessment scenarios in the chapter</u></p>	<p>The Applicant should revisit the assessments for <u>all construction and operation phase scenarios, these scenarios taking account of the previous comments made.</u></p>	Low

		have been undertaken in line with the assessment discussed using the same assessment methodology to date . Therefore, all previous comments made on the initial construction and operation phase scenarios assessment are relevant to the other scenarios here .		
157.	Cumulative effects	The conclusion that in the absence of information, it is not possible to provide a cumulative assessment for all construction effects, is simplistic and given the significant concerns raised with the main assessment, a comprehensive cumulative assessment should be undertaken to establish if there are potential issues within the study areas. Furthermore, paragraph 17.11.9 states that the construction period of the project will overlap 'to some degree' with Tier 1 schemes. The statement 'to some degree' is understating the potential labour supply issues. It is clear there will be commonality of skills and trades demanded by the project and other construction projects. The operational cumulative effects (first full year) section is based on projections of future population, labour supply, jobs and housing and is unlikely to have a material effect on the conclusions from the initial assessment. A number of queries related to population, labour supply, jobs and housing have been raised which would have an impact on this assessment.	The Applicant should revisit and undertake a comprehensive cumulative assessment. The Applicant should undertake an assessment at local authority level for those authorities based in the FEMA, <u>providing a qualitative commentary to explain the implications rather than just signposting to numeric tables.</u>	Low
Document name: Environmental Statement Appendix 17.9.3: Assessment of Population and Housing Effects				
168.	Use of outdated data sources	Census 2011 has been used for dwelling vacancy and economic activity. Further, in the description of employment-led scenarios, paragraph 3.1.9 notes that modelling assumes that commuting, unemployment and economic activity are fixed over the forecast period based on inputted assumptions, a number of which are significantly out of date including vacancy and economic activity rates from the 2011 Census.	Where old data has been used to underpin the assessment, the Applicant should revisit and <u>also include up to date data with the most recent information from the 2021 Census which is available.</u>	High
179.	The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local <u>affordable housing needs or requirements at a housing market area or local level (such as market signals.</u>	There needs to be a more granular assessment of housing delivery in the area, in particular <u>of future supply, as well as</u> the unmet affordable housing need to inform the assessment. <u>The Applicant fails to consider the complex reasons affecting housing supply in</u>	The Applicant should revisit the assessment and undertake a more granular assessment of <u>affordable housing delivery (including affordable housing)</u> to take account of existing constraints. Further justification should be provided and	Low

	affordable housing or constraints on housing supply .		reviewed against past performance to substantiate the conclusions.	
1820 .	Housing Delivery (including water neutrality implications) on housing delivery	<p>It is not correct for the Applicant to surmise at 4.3.11 that the Local Authorities (as of August 2021) would have been able to take account of water neutrality implications on housing delivery through their trajectories. Issue of the Natural England Position Statement in September 2021 instantly applied water neutrality requirements to planning applications, effectively stopping development as planning applications could not be consented without having demonstrated water neutrality. As such, the housing delivery implications of water neutrality were not fully understood as of August 2021. Furthermore, the Applicant has not used the latest housing delivery reports which would take account of these issues.</p> <p>The council would reiterate the factual point that the August 2021 housing trajectory could not take account of water neutrality (as the Natural England Position Statement was not issued until September 2021). We note that although water neutrality has delayed housing delivery, it is not anticipated to reduce the overall projected housing delivery for Crawley – this reflects the position at the recent Crawley Local Plan Examination hearings.</p> <p>For information, the Crawley Borough Local Plan 2023-2040, Main Modifications Consultation Draft, February 2024 includes an updated housing trajectory (base date 31 March) covering the Plan period 2023 to 2040.</p>	<p>This is an important clarification that should be made, as the Applicant's current wording infers that water neutrality implications were factored into August 2021 housing trajectories, when in reality the 'stop' on development came after issue of the Position Statement in September 2021. Furthermore, in the instance highlighted above, the Applicant should use the latest information available to inform the analysis.</p>	Low For Information
1924 .	Assessment of impacts on labour supply	<p>Paragraph 5.2.14 states that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area (Croydon and East Surrey) where the project tips surplus into supply in a single year. The basis for this conclusion does not appear robust, as based on the analysis the project is shown to exacerbate labour shortfall issues across multiple areas. Furthermore, if underlying inputs in the model are changed to reflect the fact that the labour market is already more constrained as has been modelled, it is likely shortfalls would be greater across many of the areas. In particular, the Authorities</p>	<p>Given the limitations in its approach, the Applicant justify the basis of the assessment which concludes that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area. The applicant should revisit the assessment which should be undertaken at a local authority level.</p>	Low

		understand there to be skills shortages across the construction sector in Sussex, including for basic construction skills and more specialist sectors within the supply chain, as informed by Future Skills Sussex in its Local Skills Improvement Plan (2023). This is discussed further in the West Sussex LIR, Paragraphs 18.36 to 18.48.		
202.	Vacant properties	In paragraph 6.2.3-6.2.4 the Applicant provides an analysis of vacant properties, which implies that bringing these back into use will help meet the demand generated by non-home based workers. There is no analysis of why these properties are vacant, length of time vacant and barriers bringing them back into use.	A more robust assessment of the current private rented market is required. The Applicant needs to consider how it can help to bring these properties back into use, both in the short term by the non-home based workers but also by bringing a benefit to local areas and bringing properties back into use by local population once construction is complete.	Low
21.	Construction Phase Impacts on Temporary Accommodation	In Crawley, GAL's estimation of 119 available properties to rent, derived from Lichfield's interpretation of the 2011 Census data, is considered to be high, as there is in reality limited stock available on the market and increasing demand for private rented accommodation. CBC has insufficient temporary accommodation within its own portfolio and cannot source sufficient short term private accommodation within the borough, resulting in some families having to be housed in accommodation which does not meet their needs, possibly out of the borough and for long periods of time. The unprecedented growth in the demand for temporary accommodation, and the indications of this trajectory continuing along this trend is the main reason for CBC declaring a Housing Emergency on 21 February 2024. Any increased demand and competition from NHB construction workers for the Project seeking short term private rented accommodation in Crawley, or the surrounding areas will increase the demand pressure still further. This is discussed in further detail in the West Sussex LIR Paragraphs 18.49 to 18.56.	The Applicant should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include liaison with local authorities in the FEMA. The analysis should also take account of other schemes that could need construction workers who may require temporary accommodation.	Low
223.	Impacts on affordable housing	Paragraph 7.5.1 recognises that the project is likely to generate demand for affordable rented housing which is	The Applicant should substantiate the conclusion that the project is	Low

		<p>greater than the number of homes in the existing stock. If this exercise is done at a local authority level, then the figures are very different and the true impacts at local authority level are being hidden.</p> <p>Secondly, assessment goes on to conclude that despite the demand from the project being skewed towards affordable housing, there are unlikely to be impacts on affordable housing beyond what is emerging or planned for. However, analysis of completions by local authority (Table 7.4.1) has demonstrated that the delivery frequently does not meet the need, and therefore a shortfall is likely. On that basis, the conclusion that the project is unlikely to have any impact on affordable housing demand beyond what is planned for does not appear well founded.</p> <p><u>For Crawley, total affordable housing need is almost as high as its overall housing need of 755 dwellings per annum (12,835 over the plan period 2023-2040), of which only 42% (5,330) can be met within the borough). Only 17% of Crawley's identified affordable housing can be met in the borough. The Applicant acknowledges at paragraph 17.9.68 of the Environmental Statement (APP-042) that potential tenure demands associated with the Project are likely to be slightly skewed more towards affordable housing than the existing employment base. Given that Crawley is unable to meet its existing affordable housing need, it follows that the Project will exacerbate what is an existing unmet need for affordable housing within Crawley Borough. Further detail is provided in West Sussex LIR Paragraphs 18.76 to 18.80.</u></p>	<p>unlikely to have any impact on affordable housing demand. The analysis should be updated at a local authority level in order to help identify issues which need to be planned for and mitigated.</p>	
	Document name: Environmental Statement Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note			
234.	Distance travelled to work data	<p>Paragraph 2.1.6 explains that the study draws on data provided by the Construction Industry Training Board (CITB) in terms of average distance workers travel to sites for each region of the UK. The application of a regional estimate to capture numbers of home-based workers can be problematic given the considerable differences that exist within local geographies.</p>	<p>The Applicant should review their approach to this assessment and apply relevant assumptions to the modelling to take account of local variations.</p>	Low
245.	Use of out of date data sources	<p>Where Census 2011 data is being relied upon for analysis, there needs to be an assumption/limitation</p>	<p>The Applicant should review their approach to this assessment and</p>	High

		added to the analysis given the source is significantly out of date which could affect the accuracy of the GGM. This has the potential to affect the accuracy of the GGM in terms of estimating numbers of home-based (HB) workers and non-home based (NHB) workers.	apply relevant assumptions to the modelling to take account of the up-to-date situation.	
<u>256.</u>	Labour supply constraints	The Gravity Model used to identify the split of construction workers as 80% HB and 20% as NHB does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA. Given these constraints, an assumption of 80% HB construction workers doesn't appear to be very realistic in practice or indeed a worst-case approach.	The Applicant should revisit their approach and include a worst-case scenario which assumes all construction workers will be NHB.	Low
<u>267.</u>	Private rented sector (PRS) accommodation	Section 6.3 provides details of allocation of NHB workers by local authority vs supply of private rental sector beds. Table 6-5 presents PRS bed supply for 2021 by local authority but it isn't clear how these figures have been derived given Paragraph 3.5.2 advised the data on bedrooms was gathered from the 2011 Census. In addition, whilst the figures present PRS bed supply, they do not advise on the availability of accommodation. In the light of a declining supply of rental accommodation and feedback from local authorities on limited availability (PADSS Row 21 refers) this would seem to be a significant omission. Further detail is provided in West Sussex LIR Paragraphs 18.76 to 18.80.	The Applicant should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include the English Housing Survey and liaison with local authorities in the FEMA. The analysis should also take account of other schemes that could need construction workers who may require temporary accommodation.	Low
Document name: Appendix 17.8.1 Employment, Skills and Business Strategy				
<u>278.</u>	Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to Implementation Plan is not identified.	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why the Applicant is unable to provide further details on these arrangements within the ESBS (which is the control document) in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a Business as Usual (BAU) scenario.	The council note that the ExA have requested that the Applicant submit a first draft Implementation Plan at Deadline 3 (19 April), and welcome the Applicant's establishing of an ESBS Steering Group to feed into this work (first meeting 25 March). Outcomes sought by the Local Authorities are summarised below: The Applicant as part of ESBS should provide more detail on potential tailored initiatives that would specifically align with and	Uncertain

		<p>Furthermore, the ESBS does not set out any process for how the Implementation Plan would be developed. Given the Applicant is currently suggesting that the majority of the relevant content for the local authorities will be set out in the Implementation Plan, it is essential that the Applicant provides further details on the process for delivering this.</p>	<p>support local communities. This should include relevant baseline information to demonstrate local need, which should appropriately consider the variations between local authorities.</p> <p>The Applicant should provide some details on performance, financial management, monitoring and reporting which can be developed further as part of an Implementation Plan. <u>The achieving of appropriate and deliverable outcomes will be key.</u></p> <p>The Applicant should also clearly explain the difference of BAU and DCO scenarios in terms of provision & outputs.</p> <p>A route map should be provided which explains the process from ESBS to Implementation Plan, aligned to areas of identified local need and outcomes.</p>	
Document name: Environmental Statement Appendix 17.6.1: Socio-Economic Data Tables				
289.	Out of date data sources	<p>Several Baseline Data Tables are out of date and don't use the most recent data sources available at the time. <u>This includes education data on shortfall/surplus which needs to be tested with relevant local education authorities.</u></p>	<p>The Applicant should be using the most up-to-date sources <u>where this could be material to impacts arising from the Project, e.g. (but not limited to) temporary accommodation during construction phase.</u></p>	High
Document name: Appendix 17.9.2 Local Economic Impact Assessment				
2930.	Additionality assumptions	<p>It is unclear to what extent additionality assumptions have been accounted for in the estimates of GVA and employment effects including direct, indirect, induced and catalytic effects. Paragraph 6.3.5 states that estimating net direct, indirect and induced impacts requires assumptions on displacement that are difficult to determine robustly. Whilst it is acknowledged that estimating levels of displacement can be tricky,</p>	<p>The Applicant to clarify its approach to additionality. The Applicant should apply displacement (and other additionality assumptions) to the various calculations to align with Green Book guidance.</p>	Low

		<p>assumptions can still be applied through the application of a precautionary approach and use of benchmarks.</p> <p><u>This is further discussed in Appendix F of the West Sussex LIR.</u></p> <p><u>Please note: Work is ongoing between York Aviation and the Applicant regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at Deadline 5, when the ExA request this is next submitted into the Examination.</u></p>		
<u>3034.</u>	Basis for distribution assessment of direct impacts	<p>Paraph 5.3.9 states that the impact estimates on the basis of residency distribution of direct impacts are presented. GAL has provided pass holder address information to inform this. It is not clear when this information was obtained therefore the local authorities cannot be certain the information used is up to date.</p>	The Applicant to confirm the date of pass holder information used.	Low

HEALTH AND WELLBEING

Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
42.	Loss of public open space	It is stated that as a mitigation measure, new areas will be created to serve all users but will not be immediately contiguous with area lost. This does not provide enough reassurance that mitigation measures will be targeted at communities or groups impacted by the loss.	The Applicant should further demonstrate that this will be easily and equally accessible to current users and communities. Evidence of the consultation and the feedback from this community that use the area.	High
43.	Lack of an Equality Impact Assessment	Though Equality is stated as a baseline there is no Equality Impact Assessment of the effects of the Project. This would aid in the understanding of how the project may impact on different groups and ensure that certain individuals are not put at a disadvantage or discriminated against as a result of the project activities. This would also ensure that mitigation measures can be tailored to avoid harm to equality.	It would be beneficial for the Applicant to undertake an Equality Impact Assessment.	Uncertain
<u>1.</u>	<u>Potential adverse impact on the health of West Sussex communities including vulnerable groups during construction and operational phases of the Project</u>	<u>The Applicant has not completed a standalone HIA or integrated a HIA to the same quality, scope, and scale as a standalone assessment specifically for West Sussex.</u>	<u>It is recommended the Applicant undertakes a HIA that seeks to robustly assess the potential effects, including physical and mental, on the health of the population, analysis of some of the data on smaller geographies to highlight inequalities, and to make clear the mitigations or that need further consideration.</u>	<u>Uncertain</u>
4.2.	Lack of evidence of how local services will be affected. Limited local intelligence and insight into the planning assumptions of the Project, specifically how this may influence local communities and vulnerable populations	WSCC is concerned that the impact of the Project on local health services is currently not considered. This is particularly important, as from practical experience in West Sussex, a higher throughput at Gatwick Airport has often led to an increased demand for health services. There is no evidence of how community engagement with the affected communities has influenced the outcome and any mitigation made in the Applicants' assessments.	Evidencing the predicted increase in footfall due to the Project and how this may impact on acute care. It is recommended the Applicant expands on the HIA that makes use of local intelligence and robustly engages vulnerable populations. The HIA should make clear how the Applicant has feedback from those communities to inform the assessment of health effects.	Uncertain

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2.3.	<p>Lack of evidence of engagement and results from that engagement with the communities/ receptors.</p> <p>Potential increased demand on local health care services</p>	<p>Results should be presented with a detailed description of the statistical methods used, including all variables accounted for and those not included in the analysis models. This would enable a better interpretation of the results, which seem not to be in line with what should be expected. A detailed definition of the populations in the study area and a clear description of evidence supporting each assumption made have not been demonstrated. The impact from construction staff on primary care and secondary care services is evidenced. However, the increased footfall of passengers when increased flights are operational, and the impact on emergency attendances for this group within secondary care A&E services is unclear.</p>	<p>W/SCC would expect to see data on engagement with the affected communities demonstrating their concerns and implications to them. It is recommended that the Applicant provides clarity in relation to the points identified above.</p>	Uncertain
3.4.	<p>Lack of evidence of improvements to social mobility</p> <p>Potential to adversely impact air quality during construction and operational phases.</p>	<p>There is no indication that consideration has been given to the impact on small and medium sized businesses, or where this is cross referenced from other chapters. It is advised that this is included, considering the influence it could have on health and well-being. It is vital to consider the nature and quality of work and how this benefits residents and future generations when discussing the economic benefits of the Project.</p> <p>Reference is made to the UKHSA assessment (RR-4687) which identifies a potential moderate impact from long term concentrations which have not been detailed in the assessment.</p>	<p>This information to be evidenced in the Employment, Skills and Business Strategy</p> <p>Reference is made to the required changes and mitigation measures as reported in this LIR, section 10 - Air Quality.</p> <p>The Authorities support UKHSA recommendations in relation to air quality and clarity needed from the Applicant.</p>	Uncertain
4.5.	<p>Lack of evidence to support professional views and assumptions made in the documentation</p> <p>Potential adverse noise impacts on health during construction and operational phases</p>	<p>Evidence used to substantiate assumptions should incorporate feedback from communities likely to be impacted by the Project.</p> <p>For example – it is claimed that expected increases in walking journey times are not considered to be 'onerous' and would contribute to physical activity levels, it is also possible for longer journey times to discourage people from active travel – having a negative and perhaps rebound impact on active travel. There is insufficient information to allow an understanding of the conclusions made around this or if the diversions have disproportionate impacts on certain groups.</p>	<p>The Applicant should provide further evidence that the Project will not have a disproportionate impact upon vulnerable groups. Evidence such as community feedback on implications to their journey times.</p> <p>UKHSA (RR-4687) notes limitations in the Applicant's assessment of noise and evidence of effectiveness in relation to some of the mitigations.</p> <p>The Authorities support UKHSA recommendations in relation to air quality and clarity needed from the Applicant.</p>	Uncertain

		<p><u>Reference is made to the required changes and mitigation measures as reported in this LIR, section 11 - Noise and Vibration.</u></p> <p><u>Increase in operations and flights, leading to an increase in noise are likely to adversely impact health. The increase is expected to rise by 69pprox.. 13 million passengers per annum (mppa) by 2047.</u></p>		
6.	<p><u>Potential impact on healthy lifestyle behaviours due to land take at Riverside Garden Park and Church Meadows</u></p>	<p><u>The land is located within Surrey close to the West Sussex border and is accessible to West Sussex residents. There is potentially a negative impact on mental and physical health due to the inability to promote and sustain healthy behaviours that may be due to a reconfiguration of the recreational/green space. This might amount to limited and more difficult access to key facilities or may impact on the ability to safely undertake physical activity for example</u></p>	<p><u>The Applicant should assess the potential for proposed changes to the recreational space that may adversely impact on people's ability to maintain health and wellbeing.</u></p> <p><u>Additionally, the impact, and assessment of noise in recreational areas requires further understanding, ideally through engagement with communities to understand local views and concerns.</u></p>	<p><u>Uncertain</u></p>

CUMULATIVE ASSESSMENT AND IMPACTS

REF	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	Lack of support for the Crawley Western Multi-Modal Transport Link	<p><u>It is unclear to what extent the transport impacts of the development at West of Ifield have been considered alongside the construction phase of the Project. The Applicant indicates that it has not been considered necessary to include a cumulative assessment which includes the scheme. The Authorities do not agree with this decision by the applicant and consider there is the potential for unassessed and unmitigated impacts. The Transport Assessment (para 15.5.24 and 18.7.5) acknowledges the modelling shows traffic may take a route on the west side of the Airport from Ifield Avenue in Crawley via Bonnets Lane, these routes are adjacent to the West of Ifield site. The Transport Assessment shows cumulative adverse impacts on local roads, particularly within the western neighbourhoods of Crawley. There are a number of highways works associated with the West of Ifield scheme, in particular a multi-modal route which the West Sussex Transport Plan and the Crawley Borough Local Plan 2023-2040, Main Modifications Consultation Draft February 2024, identify as an Area of Search. GAL's support for the Crawley Western Multi-modal Transport Link is necessary to alleviate this future impact. West Sussex LIR Paras 19.28 to 19.32 refer.</u></p>	Provide support, in policy terms and potentially financially, <u>for</u> the Crawley Western Multi-Modal Transport Link to enable developers to alleviate this impact should development West of Ifield come forward.	Uncertain

2.	Safeguarding for a future southern runway should be removed if the NRP is approved	Safeguarding for a potential future southern runway significantly impedes the ability of Crawley to meet its development needs for housing, employment and noise sensitive supporting infrastructure such as schools. GAL is not actively pursuing this option and, given growth through the Project continues to 2047, it would be unlikely a southern runway would be needed until around 2050. West Sussex LIR Para 18.81 refers.	Confirm that GAL will not pursue the requirement for safeguarding	Uncertain
3.	Gatwick Green Strategic Employment Location	The date of construction of Gatwick Green was assumed in Table 12.11.1 of Chapter 12 of the ES to be 20% complete in 2029, 50% in 2032 and 100% in 2047. However, evidence submitted to the Crawley Borough Local Plan Examination identifies the completion date as 2035. The Crawley Infrastructure Delivery Schedule December 2023 identifying on site delivery from 2027/28, indicating construction could commence in 2025. The Gatwick Green allocation is sited immediately east of the Project, and there is considerable potential for overlaps to occur with the construction of the modified M23 Spur and particularly with the Balcombe Road bridge widening which is in close proximity to the northern access to the Gatwick Green site. This would create unassessed impacts to occur on the local highway network, particularly Balcombe Road, and/or on the operation of this Strategic Site. West Sussex LIR Para 19.27 refers.	The Applicant needs to ensure that access to third party land, for this site and any other, is maintained throughout the construction period as a commitment within the Construction Management Plan.	Uncertain
4.	Capacity of Crawley Sewerage Treatment Works.	The Authorities have not yet been assured by the Applicant that Thames Water has confirmed that the impact of the DCO's increased wastewater flows, together with those from planned development in the area have been taken into account. The Authorities are concerned that the physical design of the Project works, including the	If upgrades to the Works are deemed necessary, there is no clarity on whether this could impact on phasing for other developments. Confirmation from Thames Water.	Uncertain

		<u>new Reed beds, could compromise the ability of the Crawley Wastewater Treatment Works to expand should that be necessary in the future.</u>		
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DRAFT DCO / OTHER MISCELLANEOUS CONCERNS

Ref	Principal Issue in Question	Concern Held	What needs to change/be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during the Examination
1.	The Council has wide-ranging concerns about the dDCO.	<p>These will be shared with the Applicant in due course and set out in the Council's LIR.</p> <p>A summary of the Council's main concerns (which is not exhaustive) is set out below –</p> <ul style="list-style-type: none"> i. the definition of “commencement” and, in particular, the implications arising from certain operations which fall outside that definition and which do not appear to be controlled (article 2(1), interpretation). ii. clarification of other definitions relating to various airport and boundary plans listed in the order and extent of operational land. iii. the drafting of article 3 (development consent etc. granted by Order). iv. the drafting of article 6 (limit of works) which appears to allow GAL to exceed parameters beyond those assessed in the Environment Statement. v. the drafting of article 9 (planning permission) and provisions in relation to existing planning conditions and future planning controls (including permitted development rights). vi. the drafting of article 25, which concerns trees and hedgerows. vii. the drafting of Part 6 (Miscellaneous and General) particularly the impact of article 46 (disapplication of legislative provisions) on 	<p>Amended wording to ensure the dDCO is worded appropriately to ensure they are meaningful and enforceable.</p> <p>Outstanding concerns remain regarding the dDCO and a schedule of changes has been commented upon and attached to the 'Copmments on the Applicant's Deadline 1 Submission Development Consent Order – schedule of Changes [REP1-005]'. Iterations of this schedule are likely to be presented at appropriate deadlines.</p>	Uncertain.

		<p>drainage and article 48, which provides a defence to statutory nuisance.</p> <p>viii. the inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development).</p> <p>ix. the drafting of several requirements (Schedule 2) including: the drafting of "start date" (R.3(2) (time limits and notifications); the 14-day notification period in R3(2); why some documents must be produced "in accordance with" the certified documents and others must be produced either "in general accordance" or "in substantial accordance" with them; the drafting of R.14 (archaeological remains); and of those which concern noise (e.g. R.15 (air noise envelope), R.18 (noise insulation scheme)); the ambiguous drafting in R.19 (airport operations);</p> <p>x. concerns regarding Schedule 11, including the proposed timeframe for granting approval for the works, particularly those which are complex and for which limited information has been provided. The lack of any fee proposal for the processing approvals etc. is a matter of genuine concern.</p> <p>xi. the limited information contained in the documents listed in Schedule 12 (documents to be certified).</p>		
2.	Resources, timings and costs involved with discharge of requirements and monitoring and enforcement of ongoing mitigation measures	There has been no discussion with applicant to date on this matter. Schedule 11 in the DCO is not populated. This remains the case as of 26.3.24 (contrary to what might be suggested in the wording in the SoCG 2.7.1.12)	The scale and complexity of the project will require significant LPA resource. CBC welcomes dialogue with the applicant to progress this matter. CBC welcome the opportunity to discuss with GAL.	Uncertain
3.	Exclusion of Local Plan Policies and lack of consideration of their requirements.	Lack of reference or acknowledgement of the adopted policies and relevant supplementary guidance that should be considered as part of the	Amendments to ensure all policies and documents referenced in the main ES are listed in Appendices and demonstration that the DCO	Uncertain

		DCO. <u>Through the SoCG (most recently at Section 2.17), the Applicant has committed to preparing a "Local Policy Assessment Table", but this is yet to be provided. Related to this, CBC has asked the Applicant to include reference to the policies of the Crawley Borough Local Plan 2023-2040, Main Modifications Consultation Draft, February 2024. This is also yet to be addressed.</u>	works comply with these requirements (or explain why not).	
4.	<u>Lack of clarity on how Port Health functions will be scaled in line with passenger growth</u>	<u>Currently Port Health has insufficient space. Not clear where new space will be provided.</u>	<u>Identify new space provision, in consultation with Port Health team</u>	<u>High Resolved –see SoCG v1 2.18.1.9</u>
5.	CAA No Impediments	When GAL expects the Civil Aviation Authority to confirm there are no obvious safety related impediments	Applicant to provide CAA letter of No Impediment. <u>GAL comment that letter should be submitted early in Examination stage is noted.</u>	High
6.	Northern Runway operation controls	How the runway operation changes mentioned in paragraphs 1.3.7 and 1.3.8 will be secured and appropriately controlled	dDCO requirement to be added and agreed	high
7. Planning Statement	Airports National Policy relevance to the DCO determination	Whether there is any legal precedent for the statement that it is "appropriate to use the policy framework of the [Airports National Policy Statement (ANPS) as the primary framework against which the project as whole should be tested" (para 1.5.19)	Legal Confirmation	Uncertain
8. Planning Statement (Appendix A)	Planning History	<u>The Applicant has committed to undertake a review of the Planning History. However, as currently drafted this is incomplete, inaccurate and misleading. No details on the current controls and conditions imposed by existing planning permissions <u>have been included</u>, and no evidence <u>is provided</u> to justify the baseline position being relied upon</u>	Reviewed Planning History <u>to be</u> agreed with the LPA. <u>The Applicant has not addressed this request. CBC has therefore provided this key information in the West Sussex LIR, and await the Applicant's comments.</u>	Uncertain.
9.	<u>Site Waste Management Plans</u>	<u>Why the dDCO does not make provision about securing that Site Waste Management Plans following the template in the Construction Resources and Waste Management Plan</u>	<u>dDCO provision</u>	<u>Uncertain</u>

40- Planning Statement Section 8-16	<u>Geology and Site Conditions</u>	<u>Refers to "existing legislative regimes" for spillages and storage facilities. Aside from the Control of Pollution (Oil Storage) (England) Regulations, are any other regimes relevant</u>	<u>Applicant review</u>	<u>Uncertain Resolved see SoCG v1 2.18.1.13</u>
11	<u>Applicant to provide details of case law in respect of making best use (MBU) of existing runways in respect of Stansted and Manston airports.</u>	<u>The Authorities have questioned the applicability of the national Making Best Use of Existing Runways policy to this application as they are not, at this stage, entirely clear as to the scope of the works being proposed.</u>	<u>The Applicant has provided more detail on the scope of the engineering work at D1 through Application Document Ref: 10.9.2 (The Applicant's Response to Actions – ISH1 The Case for the Proposed Development) Action Point 3. The Authorities will come to a view as to whether the works are an alteration to a runway or the creation of a new runway.</u>	<u>Uncertain</u>
12	<u>Airports NPS and National Networks NPS (position regarding s104 and s105 of the Planning Act 2008 and National Policy Statements).</u>	<u>The Councils consider that the application falls within the scope of s.104 PA 2008 and its provisions should be applied. The NNNPS has effect in relation to application in so far as it comprises the 'highway related development' elements of the proposal. The Airports NPS does not have effect in relation to any parts of the application, but it is an important and relevant matter in so far as the proposal comprises 'airport related development'. Because the NNNPS does not contain any guidance on the assessment of 'airport related development', and that development is a fundamental component of the proposal, the NNNPS does not provide a sufficient guide to determine whether the application, taken as a whole, is in accordance with it. This is discussed in greater detail through the West Sussex LIR (Paragraphs 6.1 to 6.10).</u>	<u>The Applicant has provided more detail on the scope of the engineering work at D1 through Application Document Ref: 10.9.2 (The Applicant's Response to Actions – ISH1 The Case for the Proposed Development) Action Point 1. The Authorities will review the material submitted by the Applicant and form a view.</u>	<u>Uncertain</u>