

Gatwick Northern Runway Project (Project Reference: TR020005)
Principal Areas of Disagreement Summary Statement (PADSS) – Version 2
West Sussex County Council (IP Ref: 20044715)
Deadline 2: 26 March 2024



Introduction

This report has been prepared by West Sussex County Council (WSCC), with input from the joint authorities and appointed consultants where required. WSCC is a host authority for the Gatwick Northern Runway Project DCO. This document identifies the initial principal areas of disagreement that have been identified when reviewing the DCO documentation, updating on Version 1 (AS-072).

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 be 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.

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.

For some 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 WSCC is unable to update the resolution status or otherwise on air quality matters within the PADSS. This will be completed and submitted to the ExA at Deadline 3 and separately in further communications with the Applicant.

WSCC appreciates this document is long; however, its length is a reflection of the scale of its main concerns with the application. In the light of these concerns, WSCC considers the length of the document to be reasonable.

Unless a fuller explanation is provided, the following terms have been used in the column headed 'Likelihood of concern being addressed during the Examination':

- **Likely** – where agreement should be possible, or a relatively simple change is required.
- **Uncertain** – where an issue is being, or will be, discussed and the WSCC intends to provide an update on the position in due course.
- **Unlikely** – where agreement on an issue is unlikely or it is difficult to identify a solution.

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Forecasting and Capacity				
1.	The capacity deliverable with the Project.	Modelling by the Applicant of the capacity deliverable with the Project has assumed that one-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
2.	The forecasts for the use of the Project 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 Project (see Ref 1). 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. 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	Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick Airport in competition with other airports, not limited simply to traffic, including that from other regions of the UK, which has historically used the London airports.	Uncertain

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		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 Project.	The methodology used to assess the catalytic employment and GVA benefits of the Project 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 Airport having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.	Uncertain
Assessment of Alternatives				
4.	Lack of detailed evidence with regards environmental and social criteria for assessment of Project options.	Without further evidence of environmental and social criteria influencing the options appraisal process, stakeholders cannot be satisfied that the least impactful option has been taken forward.	Applicant to present supporting constraints and opportunities mapping, along with further evidence on scoring narrative, to support the conclusions of the assessment work.	Likely
Project Description				
5.	The Applicant has proposed a significant amount of development to support the	WSCC questions whether the inclusion of new hotels and office blocks is relevant or directly related to this growth.	Justification is therefore needed for the required supporting infrastructure and its necessity to facilitate the required passenger throughput. The Applicant is asked to justify and make clear what is	Uncertain

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	increase in passenger throughput.		part of the 'Authorised Development' in the NSIP and what is considered to be the 'Associated Development' and how this does/does not relate to the future baseline.	
6.	Lack of construction phasing information.	Further information is needed to satisfy stakeholders correct levels of mitigation have been put in place through the lengthy construction phase, including traffic management.	Production of more detailed construction phasing information	Likely
7.	Community engagement through the construction phase.	Lack of clarity or outline control document with regards community engagement through the construction phase	The production of an outline community engagement plan and its securement through the Code of Construction Practice (CoCP) (APP-082). WSCC acknowledge the Applicants commitment to provide further clarity on this at Deadline 3 of the Examination.	Likely
Historic Environment				
8.	Management of Historic Environment effects.	The CoCP does not reflect the archaeological work proposed. The objective should be to protect or mitigate the setting of built heritage and the recording of affected archaeological deposits. It also does not detail a Heritage Clerk of Works.	Further information is needed which should be related to the methodology proposed within the Written Scheme of Investigation (Document 5.3, Appendix 7.8.2). A Heritage Clerk of Works should be appointed.	Likely
9.	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 and relate this to the potential archaeological impact of the Project. The Applicant has indicated in SoCG (V1 – March 24) that it	Likely

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			will prepare such a report and will discuss this via Topic Working Groups	
10.	Lack of archaeological evaluation within the Airport perimeter.	The scheme of archaeological investigation undertaken to date, has been focused on areas within the Project that were easily accessible and has not covered all potential areas of impact.	Appropriate commitment within the WSI to undertake investigations in all areas under threat from the Project. There has been no progress to date on this issue .	Uncertain
11.	Proposed mitigation on areas already evaluated.	The proposed mitigation identified within the WSI on areas that have been evaluated is not sufficient and will need to be expanded.	Improved and expanded mitigation strategy within the WSI.	Likely
12.	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. Level 3 recording has been agreed by The Applicant but this now needs to be reflected in a revised version of the WSI for West Sussex.	Likely
13.	No proposals for heritage community outreach.	No potential heritage community engagement identified in the CoCP.	Identify an outreach programme to inform the community of the archaeological findings. The Applicant has indicated in SoCG (V1 – March 24) that they are happy to discuss adding a section regarding community engagement into the WSI for West Sussex. WSCC are willing to engage and discuss further.	Uncertain

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14.	Clarity in sign off for archaeological mitigation.	Failure to define a procedure for the monitoring and signing-off of the archaeological works.	Clear sign off procedure needed, detailed within the WSI. The Applicant has indicated in SoCG (1 – March 24) that happy to discuss adding this to WSI (matter to be progressed via TWG and SoCG discussions.	Likely
Landscape, Townscape and Visual Assessment				
15.	Lack of Zone of Theoretical Visibility (ZTV) for project elements.	Although stated in the application that a separate ZTV for the CARE flue is provided, no evidence of this is included within the documentation. No ZTVs are produced for the construction compounds.	To produce ZTVs for the CARE facility and construction compounds. Further assessment is required to understand how construction phase visual effects will be mitigated.	Likely
16.	Lack of certainty high quality design will be secured.	The design principles, upon which the detailed design would be secured against, have had no input from stakeholders and are currently not detailed enough for each element of the Project	Further development of the design principles and content of the DAS to secure better outcomes in detailed design for Project infrastructure.	Uncertain
Ecology and Nature Conservation				
17.	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	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	Uncertain

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		to maintain bat foraging habitat and commuting routes over the short and medium term.	planting in the Sketch Landscape Concept Plans within the OLEMP, and further explanation of the woodland BNG calculations.	
18.	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
19.	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. WSCC hopes to have further discussions with the Applicant, including regarding the landscape design for the internal road network.	Uncertain

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20.	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. The Joint West Sussex LIR requests greater clarity and commitment in the OLEMP regarding the long-term positive management of these areas.	Likely
Arboriculture				
21.	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 Likely (if further discussion is initiated)
22.	Need for further demonstration that Project proposals have been adequately designed with consideration of arboricultural features through avoidance, mitigation or compensation.	Potential loss or impacts to multiple arboricultural features which may be avoidable, mitigated or better compensated for.	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). Within the Arboricultural Impact Assessment (REP1-026): - Provide further detail of project proposals to demonstrate the need for the proposed tree removals, notably high quality and TPO trees (justify why mitigating measures would not be appropriate).	Likely

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			<ul style="list-style-type: none"> - Provide design principles which may reduce tree loss during detailed design. - Identify how Horleyland Wood (and any other ancient 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). - Identify how compensatory tree planting proposals considers local policy CH6 of the Crawley Borough Local Plan 2015 – 2030 (as detailed within para. 9.73 of the Joint West Sussex LIR). 	
23.	The Outline Arboricultural Method Statement does not demonstrate sufficient methodology for tree protection including ancient woodland buffer zones.	Potential for adverse impacts to arboricultural features, including irreplaceable habitat, due to a lack of tree protection.	<p>Within the Outline Arboricultural Method Statement (REP1-023; REP1-024 & REP1-025):</p> <ul style="list-style-type: none"> - Provide protection measures to be adopted for ancient woodland buffer zones. - Provide affirmative wording throughout (avoiding words such as “should”). - Address conflicting working methodologies (such as 3.2.3 & 4.1.1 conflicting with 3.4.1). - Provide working methodologies for all types of works which may occur with 	Uncertain

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			<p>the root protection areas of retained trees (including landscaping works).</p> <ul style="list-style-type: none"> - Amend section 4.4 to ensure monitoring is recorded and accounts for other tree protection measures such as ground protection. - Provide 'heads of terms' and general principles to be included within the detailed arboricultural method statements which accounts for all working methodologies near trees, tree work operations, and provision of physical tree protection. - Identify what will be shown within tree protection plans. - Identify when arboricultural advice or supervision will be required for working methodologies near trees. <p>Where appropriate, amend the CoCP to reflect any changes as a result of the above.</p>	
24.	The OLEMP does not provide sufficient detail to ensure that adequate planting and aftercare plans will be provided within proposed LEMPs.	Inadequate provision of aftercare for proposed tree planting.	The OLEMP needs to identify what will be included within the detailed planting and specification plans. It also need to provide adequate aftercare for tree planting (as detailed withing para. 9.72 of the Joint West Sussex LIR)	Likely
25.	Inadequate consideration and demonstration for the protection of ancient woodland. Conflicting with	Potential impact to ancient woodlands receptors where barriers are specified to form buffer zone protection. This is of principle concern for Horleyland	Where barriers are specified to form buffer zone protection, spacing/distance of buffer should follow recommendation withing statutory guidance provided by	Likely

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	the finding of 'no impact' occurring to these receptors.	Wood due to the adjacent proposed works area for the new foul water pipeline.	Natural England and Forestry Commission 2022. The specification and methodology for the proposed barriers and need to be demonstrated.	
26.	Compensation strategies for tree, woodland and hedgerow loss does not demonstrate adequate compensation.	The net loss of woodland, the fragmentation of habitat connectivity, and the long-term effect from the time required to establish new planting.	The OLEMP lacks demonstration that compensatory tree planting proposals considers local policy CH6 of the Crawley Borough Local Plan 2015 – 2030 (as detailed withing para. 9.73 of the Joint West Sussex LIR).	Uncertain
Minerals Safeguarding				
27.	The CoCP and Construction Resources and Waste Management Plan (CRWMP) will be used to secure any prior extraction of safeguarded mineral resources.	There is no reference to relevant mineral safeguarding polices within the CoCP or CRWMP. Reference is made to the Weald Clay formation and use of clays (CoCP para 5.5.12, and CRWMP Para 4.5.14). Without clarity on why Weald Clay is being identified, it is not clear how the requirement will ensure that needless sterilisation is avoided.	Reference to the relevant local (West Sussex Joint Minerals Local Plan, Policy M9) and national policies on safeguarding minerals should be included, and clarity provided on how needless sterilisation of safeguarded minerals will be avoided through the requirements.	Likely
Operational Waste				
28.	Baseline information on current waste operations.	Information is lacking on the existing waste management operations at Gatwick Airport. Without this, it is not possible to determine whether the proposals are required (citing, scale, technology etc).	Provide clear baseline information about the current operations. This could be provided through an Outline Operational Waste Management Plan, as suggested in the West Sussex LIR (REP1-068 and REP1-069).	Likely

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29.	Waste forecasting/projections.	There are no waste forecasts provided on operational waste arisings, setting out the amounts and types of waste that would be expected at various points through the Project.	Forecasts are required, with and without the NRP, in order to understand the needs of the airport for managing operation waste. This could be provided through an Outline Operational Waste Management Plan, as suggested in the West Sussex LIR.	Likely
30.	Limited information is provided on the proposed CARE facility.	There is little information provided on proposed technologies and management methods, including whether they are consistent with the Waste Hierarchy. The assessment for the CARE facility have focused on the location only, and not the technologies that could be employed at the airport to manage waste.	Justification is required for the waste management methods and technologies that are proposed, including the consideration given to alternatives waste management methods. This could be provided through an Outline Operational Waste Management Plan, as suggested in the West Sussex LIR.	Uncertain
31.	Limited information provided on the design of the CARE facility	The DAS and design principles for the CARE facility are limited.	The DAS and design principles should be strengthened to include how the building will be designed to limit the impacts associated with operating waste facilities.	Uncertain
32.	No links to local waste planning policy in relation to the CARE facility	The DAS sets out local government design guidance, that excludes key information on design of waste facilities, as presented in The West Sussex Waste Local Plan and associated SPD on High Quality Waste Developments.	The Waste Local Plan and High Quality Waste Developments SPD provide guidance on the designing of waste facilities, and mitigation measures, that should be considered as part of the DCO, with key principles applied to the DAS to ensure the CARE is designed to minimise harm upon sensitive receptors. This could be provided through an Outline	Uncertain

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			Operational Waste Management Plan, as suggested in the West Sussex LIR.	
Construction waste				
33.	Construction waste management at the temporary construction compounds will give rise to noise and dust pollution.	The Project Description states that the compounds will be determined post consent, and in accordance with the COCP. It is important that beyond gaining permits to manage emissions from crushing activities, proper consideration to mitigation measures.	Controls and measures (through strengthening of the DAS and CoCP) are required on the heights of stockpiles, hours of crushing, and other suitable mitigation measures to minimise the impact upon sensitive receptors from the temporary compounds.	Uncertain
Water Environment				
34.	Confidence in surface water drainage hydraulic model	It is not clear whether the surface water drainage hydraulic model has used the most up-to-date FEH2022 rainfall data.	The Applicant should confirm if FEH2022 rainfall data has been used within the drainage model. If not, the model should be updated. The Applicant confirmed in the SoCG that FEH2009 has been used. FEH2022 should be used as the most up-to-date rainfall data prior to detailed design, to ensure that there is enough space in the layout to incorporate the required storage.	Likely
35.	New pumping station proposed in the southwest zone, south of the existing runway in the former Pond A catchment.	The pumping station is proposed, however pumping stations are not preferred as they require failure and emergency procedures.	The Applicant should consider if changes to the drainage design could be utilised in place of a new pumping station, as pumping should only be used if necessary. As outlined in the West Sussex LIR), features such as reed beds should be	Likely

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			considered to provide water treatment for the contaminated water earlier in the treatment process, to remove the need for a pumping station and reduce carbon emissions.	
36.	Drainage layout.	The drainage strategy proposes to use underground attenuation features. Other source control SuDS features should be used to discharge water to the underground features.	The Applicant should clearly identify the use of carrier drains, filter drains, ditches and swales as part of the drainage strategy. The Applicant should provide a plan of all the drainage features proposed. As outlined in the Joint West Sussex LIR the use of concrete and high carbon emission attenuation structures should be avoided if possible.	Likely
Transport and Surface Access				
37.	Traffic Assessment Methodology	Concerns remain that the level of growth assumed by the Applicant is too high, these concerns are supported by the assessment made by York Aviation (see Chapter 6 and Appendix F of the Joint West Sussex LIR). This could be resulting in an over forecast of the demand and therefore over provision of car parking and highway elements of the infrastructure. The Applicant should provide realistic forecasts for airport capacity and resultant demand	The use of the most relevant and representative data should be used to ensure an appropriate baseline assessment is developed and all. Whilst plausible and justified forecasts of airport capacity and resultant demand should be provided and as necessary the transport modelling work and the resultant highway mitigation amended. Further, more detailed modelling information should be provided by the applicant to fully appraise the transport impacts of the Project on the Local Road Network.	Uncertain

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		<p>generated.</p> <p>Further transport modelling information, to that already provided, is required to fully appraise the Projects impact upon the Local Road Network. The Joint West Sussex LIR highlights the further transport modelling information that is required but this includes:</p> <ul style="list-style-type: none"> • Additional modelling results should be obtained from Vissim including vehicle delays and plotting queue length over time • A LINSIG assessment of the Northern Terminal signalised junction. • A summary of the demand matrix changes that have been applied in the Vissim model for each future scenario. 		
38.	Concerns with Surface Access improvements – highways (primary mitigation).	<p>WSCC has the following concerns in relation to the highway works to the WSCC highway network:</p> <ul style="list-style-type: none"> • Speed limit reductions are proposed on London Road (A23) to 40mph are proposed and no justification has been provided or review against WSCC’s Speed Limit Policy. • Stage 1 Road Safety Audit, whilst an audit has been undertaken it has not been submitted as part of the 	<p>The Applicant should provide relevant information including justification and review of the proposed speed limit changes against the relevant guidance and policy, submit a Stage 1 Road Safety Audit and Designers Response, undertake a Design Review of the proposed works and demonstrate how it accords with the relevant highway design standard, as set out within the Joint West Sussex LIR.</p>	Uncertain

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		<p>DCO and not all the auditor’s recommendations have been satisfactorily addressed in the form of a designer’s response. Concerns remain that it has not been demonstrated that safe and suitable access can be provided.</p> <ul style="list-style-type: none"> • Suitable justification for some of the proposed sustainable transport infrastructure, to ensure it accords with the current relevant guidance such as LTN 1/20, has not been provided. <p>No design review appraising the design of the proposed highway works has been submitted to check that it accords with the relevant design standards. Further active and sustainable travel mitigation is also considered necessary to maximise the level of trips to and from the airport via sustainable modes.</p>		
39.	Concerns with Surface Access Commitments (SACs) and target mode shares.	Concerns are held about the SACs that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these targets. There is considered to be a lack of detail and robustness to the SACs and lack of clarity or suitable control should the SACs not be met. The Highway Authority is advocating an alternative approach similar to that adopted by Luton Airport to control growth against	SACs and associated mitigation to be reviewed and amended.	Uncertain

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		<p>meeting surface access modal splits. The specific concerns, relating to the SACs, are set out in the Joint West Sussex LIR but include:</p> <ul style="list-style-type: none"> • Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020. Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit significant increases in car trips to and from the airport. • Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable and active travel infrastructure to successfully meet the some of the target modal splits. • Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The Applicant has not assessed or considered the attractiveness of 		

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		<p>modes or how this could be increased.</p> <ul style="list-style-type: none"> Should the SACs not be met the proposed approach allows for higher levels of vehicular traffic than is targeted by the SACs for a substantial period of time. The Applicant will produce an Action Plan to address the failure to meet the targets. This does not provide sufficient control and the Highway Authority advocate a Green controlled Growth approach, similar to that adopted by Luton Airport. 		
Public Rights of Way				
40.	Concerns about elements of the PRoW Strategy	<p>WSCC has concerns about:</p> <ul style="list-style-type: none"> timescales for temporary closure of PRoWs. reference to permanent diversions of PRoWs. lack of clarity about indefinite closures of PRoWs. concerns about reinstatement of PRoWs. 	Further details and amendments to PRoW Strategy are needed.	Uncertain
41.	FP346/2sy – reference to diversion onto new shared route.	This is not an improvement for pedestrians as they go from having a route for walkers only to have to then contend with cyclists.	This will likely lead to conflict between users. Also clarification needs to be provided as to whether this will retain its PRoW status or not.	Uncertain

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42.	Lack of public access improvements	No proposed public access improvements on the PRoW network as part of the Project.	The Project offers an opportunity to improve a number of the footpaths locally, which need to be discussed with WSCC.	Uncertain
Air Quality				
43.	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 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 development at a local level proportionate to the value of the damage to health.</p>	<p>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.</p> <p>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
44.	Lack of specific Air Quality Action Plan (AQAP).	There is no AQAP which clearly sets out the range of measures that have been considered to specifically address local air quality. This approach differs from discussions during 2 years of consultation where a draft AQAP was provided in the air quality Topic Working Group (21.10.22) and an AQAP was listed in item 19 of Schedule	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

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		2 (Requirements) of the draft DCO (28.04.23). 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.		
45.	Lack of Dust Management Plan (DMP).	There is no DMP which clearly sets out the implementation of the specific mitigation measures that will be used to ensure that any potential adverse impacts from dust arising during construction and demolition activities are avoided during all construction stages.	The Applicant promises a DMP once detailed design plans are available. A DMP is therefore requested for the examination, and to provide additional confidence in the control measures and monitoring for the construction phase.	Uncertain
46.	Outline Construction Traffic Management Plan (CTMP).	The OCTMP 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 CTMP. However, no details on this monitoring system are provided.	Further details are requested on the proposed monitoring system and how this would protect air quality. More clarification is required regarding the additional traffic that would be expected in the future situation.	Uncertain
47.	Operational Air Quality Monitoring.	There are 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	Further information is requested to understand how air quality will be monitored, evaluated, and reported to local authorities.	Uncertain

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		monitoring of air quality and as such they are not sufficient to demonstrate compliance with air quality standards.		
48.	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.	Further clarification on the funding for the LA monitoring stations on and around the Airport.	Uncertain
49.	Controlled Growth.	There is insufficient information on how sensitive future air quality predictions are to modal shift objectives being achieved.	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 are not met. To ensure that surface access commitments are met for mode share, and that air quality is not compromised by unchecked traffic growth, it is considered that a controlled growth approach, which would restrict growth until mode share targets for surface access are met, should be adopted by the Applicant.	Uncertain
50.	Assessment Scenarios (including 2047 Full Capacity)	The concern is that the scenarios assessed in the ES 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	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.	Uncertain

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
		<p>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.</p>	<p>A modelled assessment for the final full-capacity assessment year of 2047 is required.</p>	
Noise				
51.	Local planning policies.	Local planning policies are set out 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.	Likely
52.	Assessment of vibration effects from road construction.	The assessment only considers effects from sheet piling and does not consider vibration effects from vibratory compactors and rollers used in highway construction	Vibration effects from vibratory compactors and rollers used in highway works should be assessed	Likely
53.	Air noise - 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	Provide an assessment of likely significant air noise effects on non-residential receptors.	Likely

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
54.	Air noise - Only 2032 assessment year is assessed as a worst-case.	The assessment 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.	Likely
55.	Air noise - No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary L _{Amax} , overflight, L _{den} and L _{night} noise metric; however, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.	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
56.	Air noise - No details of the noise modelling or validation process are provided. No details of measured Single Event Level or L _{ASmax} noise data from the Noise-Track-Keeping are provided.	Provision is needed of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours.	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 L _{ASmax} noise data for individual aircraft variants at each monitoring validation location.	Uncertain
57.	The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment. It is not clear why 2032 is considered worst-case for ground noise.	Higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience significant noise effects that are identified in the Central Case assessment. Whilst 2032 provides the highest absolute noise levels, there appears to be larger	An assessment of Slower Transition Case ground noise effects should be provided to identify the potential for exceedances of the SOAEL at sensitive receptors. Likely significant effects for all assessment years should be identified in the ground noise assessment.	Likely

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	Ground noise contours are not provided.	increases in noise at some receptors during other assessment years. No noise contours are provided for ground noise.	Provide LAeq and LA _{max} 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.	
58.	Road traffic noise - Noise monitoring duration.	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.	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.	Uncertain
59.	The Noise Envelope - sharing the benefits.	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 Project. The Applicant wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented,	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.	Uncertain

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
		any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope		
60.	Noise Envelope Regulation.	It is not clear in the DCO whether there would be any role for local authorities and key stakeholders in the Noise Envelope, if the Civil Aviation Authority (CAA) is the independent reviewer.	A mechanism should be included to allow the local authorities to scrutinise noise envelope reporting and take action in the case of any breaches.	Uncertain
61.	Prevention of Noise Envelope 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

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62.	Lack of detail regarding the Noise insulation scheme.	It is not clear how the noise insulation scheme would prioritise properties for provision of insulation. Residents of properties within the inner zone will be notified within six months of commencement of works; however, it is not clear what noise contours eligibility would be based upon. Lack of detail on the noise insulation measures in the Outer Zone. Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings would be eligible for noise insulation. It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.	Provide details on how the scheme would roll out. Clarify what noise contours would be used to define eligibility. Clarify on the flexibility of the noise insulation scheme. Provide details on what community buildings would be eligible for noise insulation and what level of insulation would be provided. 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.	Likely
Greenhouse Gases				
63.	The impact of EU's Emissions Trading System (ETS) / international Civil Aviation Organization's Carbon Offsetting and Reduction Scheme for International Aviation (CORISA).	It is not clear if the aviation forecasts used to develop the 'need case' has considered the impact of ETS/CORISA.	Evidence is required that this has been taken into account in the forecasts.	Likely
64.	GHG emissions from airport buildings and ground operations in the ES does not appear to include maintenance, repair,	The scope of the GHG emissions from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment	Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of	Likely

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
	replacement or refurbishment emissions.	emissions. This would under account operational GHG emissions.	total emissions and where all such exclusions total a maximum of 5%.	
Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions				
65.	It is not clear if carbon calculations were carried out during the construction lifecycle stage in the ES for well-to-tank (WTT) emissions.	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology).	<p>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].</p> <p>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.</p>	Likely
66.	Royal Institute of Chartered Surveyors (RICS) transport distances have not been applied comprehensively.	Concern with under accounting the construction transport emissions.	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).	Likely
67.	The unsustainable growth of airport operations may result in significant adverse impacts to the climate.	The increased demand in GAL’s services may lead to unsustainable surface access transportation and airport	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green	Uncertain

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		<p>operation growth, which may significantly impact the climate.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	

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
			<p>Offsets should align with the following key offsetting principles i.e. that they should be:</p> <ul style="list-style-type: none"> ○ additional in that would not have occurred in the absence of the project ○ monitored, reported and verified ○ permanent and irreversible ○ without leakage in that they don't increase emissions outside of the proposed development ○ Have a robust accounting system to avoid double counting and ○ Be without negative environmental or social externalities. 	
68.	<p>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.</p>	<p>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.</p>	<p>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure.</p> <p>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.</p>	Uncertain

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
69.	GAL does not identify the risks associated with using carbon offset schemes.	<p>Document 5.4.2, Section 1.14</p> <p>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."</p> <p>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.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> ○ additional in that would not have occurred in the absence of the project ○ monitored, reported and verified ○ permanent and irreversible ○ without leakage in that they don't increase emissions outside of the proposed development ○ Have a robust accounting system to avoid double counting and ○ Be without negative environmental or social externalities. 	Likely
Appendix 16.9.2 Assessment of Greenhouse Gas Emissions for Airport Buildings and Ground Operations (ABAGO)				
70.	Carbon calculations do not include well-to-tank (WTT) emissions, which is not	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard	Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK	Likely

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
	aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology.	(referenced in the GHG ES Methodology).	Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES [Chapter 16 of the ES, APP-041]. 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%.	
71.	It is not clear if carbon calculations are carried out for maintenance, repair, replacement or refurbishment emissions.	These emissions are not indicated to be scoped into the assessment. These emission sources could potentially account for a significant portion of the ABAGO emissions.	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%.	Likely
Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions				
72.	WTT emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology.	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard. Furthermore, this also contradicts the GHG ES Methodology referenced. This would result in an underestimation of the GHG emissions associated with aviation since a 20.77% (BEIS, 2023 ¹) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO ₂ e not being accounted	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]. Under the IEMA GHG Assessment methodology used in the ES, the	Likely

¹ <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

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
		for in 2028 (the most carbon-intensive year), where 5.327 MtCO _{2e} was estimated to be released (Table 5.2.1).	Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.	
Climate Change				
73.	Mitigation measures should be proposed to reduce the impact of Urban Heat Island (UHI) effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that the Project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect. 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.	Uncertain
74.	Lack of consideration of storm events, wildfires and fog.	Storm events are not considered sufficiently in this assessment. Wildfire is not mentioned as a possible climate hazard to impact the Airport's operation. Risks associated with fog were not included in the risk assessment.	The Applicant should give further consideration to be given to these events and risk description and rating to be revised. It is understood further information is to be provided by the Applicant to address this detail. This has not yet been received.	Likely
Major Accidents and Disasters – West Sussex Fire and Rescue				
75.	Increased risk of potential terrorist activity.	With the increase in the terminal forecourt areas and increased passenger number throughput, there is concern this could increase the risk of potential terrorist activities taking place in these locations.	Details of the current systems in place to address impacts for terrorist related threats/activities and describe any changes required to account for the Project are required.	Likely

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76.	Potential impact to emergency response times.	Relocation of RVPs would impact emergency services and possibly the attending appliances	The Applicant to provide details of any intended changes to the current and future arrangements/procedures for nominating RVPs when requesting a response from FRS and other emergency services to an airport emergency incident.	Likely
77.	Potential requirements or increased humanitarian support (and subsequent demands upon services).	In the event of a major incident or disaster, there will be an increased demand for humanitarian support, putting higher demands and pressures on acute hospitals/local authorities and Rest Centre requirements. Clarity on whether there is enough capacity at local A&E departments and within the broader emerging ICS (Integrated Care System) to cope with the demand of an additional passengers passing through the airport every year is needed.	The Applicant to provide mapping of passenger throughput in the Airport following the Project to identify numbers of passengers in any given area at one time	Likely
Economic Development				
78.	Incomplete consideration of local planning policies.	The review of policies is considered incomplete and provide limited analysis of how the Project aligns with the policies of host and neighbouring authorities.	Applicant should include a full list of adopted and emerging policies and how the project aligns with those policies and strategies.	Likely
79.	Comments raised by local authorities not sufficiently captured.	The chapter does not capture the significant extent or detail of comments raised by the local authorities particularly on the scope of the	The Applicant should clearly set out in detail all of the issues raised by the local authorities and how they were being dealt with in the ES.	Likely

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
		assessment, assessment approach and study area.		
80.	Confirmation on which projects informed the methodological approach.	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, this is not evidenced.	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.	Likely
81.	Clarification on use of pre-Covid data.	2019 data was primarily used given concerns with the Covid pandemic potentially affecting baseline data. However, 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.	Likely
82.	Magnitude of impacts definition.	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.	Unlikely
83.	Use of up-to-date information sources.	Data from the 2021 Census has been used, where available, at the relevant spatial scale. The baseline assessment presented comprised the most up-to-date position at the time of writing, however newer data is now available.	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.	Likely

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
84.	Consideration of worst-case scenario for employment benefit.	The construction assessment presented focuses on the Project's potential maximum effects. Whilst it is important 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.	Unlikely
85.	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.	Unlikely
86.	Assessment of sensitivity of receptors.	WSCC 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 Applicant should revisit the sensitivity gradings for this receptor.	Unlikely
87.	Assessment of construction effects.	The magnitude of effects on construction employment for all study areas, and magnitude of labour market effects based on magnitude criteria being used needs clarification. There are also potential data limitations in	The Applicant should revisit this assessment. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Unlikely

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
		relation to construction employment calculations. The Applicant has not undertaken any assessment at local authority level which is considered essential given existing constraints on labour supply for Crawley, Mid Sussex, and Horsham.		
88.	Assessment of construction effects during the first year of operation.	Assessment of construction effects during the first year of operation need to be revisited. The number of construction jobs would appear unlikely to have a significant beneficial effect in the FEMA and LMA. It should also be noted that the construction jobs calculation appears to be based on a 'maximum' scenario.	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.	Unlikely
89.	Operational effects.	Assessment of operational labour market effects, effects on housing, population and community facilities and services need 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 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.	Unlikely
90.	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	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.	Unlikely

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		comprehensive cumulative assessment should be undertaken to establish if there are potential issues within the study areas.		
Appendix 17.9.3: Assessment of Population and Housing Effects				
91.	The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local housing needs or requirements at a housing market area or local level	A more granular assessment of housing delivery in the area is needed, in particular of the unmet affordable housing need to inform the assessment.	The Applicant should revisit the assessment and undertake a more granular assessment of affordable housing delivery to take account of existing constraints. Further justification should be provided and reviewed against past performance to substantiate the conclusions.	Unlikely
92.	Assessment of impacts on labour supply.	The Applicant 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.	Given the limitations in its approach, the Applicant should 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.	Unlikely

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
Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note				
93.	Distance travelled to work data	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.	Applicant should review their approach to this assessment and apply relevant assumptions to the modelling to take account of local variations.	Unlikely
94.	Labour supply constraints	The Gravity Model used to identify the split of construction workers as 80% home-based and 20% as non-home based 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% home-based construction workers is not realistic or a worst-case approach.	The Applicant should revisit their approach and include a worst-case scenario which assumes all construction workers will be non-home based.	Unlikely
Appendix 17.8.1 Employment, Skills and Business Strategy				
95.	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 in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation	The Applicant as part of ESBS should provide more detail on potential tailored initiatives that would specifically align with and support local communities. This should include relevant baseline information to demonstrate local need, which should appropriately consider the variations between local authorities. The Applicant should provide some details on performance, financial management, monitoring and reporting which can be developed further as part of an Implementation Plan. The Applicant	Uncertain

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		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.	should also clearly explain the difference of BAU and DCO scenarios in terms of provision & outputs. A route map should be provided which explains the process from ESBS to Implementation Plan, aligned to areas of identified local need and outcomes.	
Appendix 17.6.1: Socio-Economic Data Tables				
96.	Out-of-date data.	Several Baseline Data Tables are out of date and don't use the most recent data sources available at the time.	The Applicant should be using the most up-to-date sources.	Likely
Appendix 17.9.2 Local Economic Impact Assessment				
97.	Additionality assumptions.	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, assumptions can still be applied through the application of a precautionary approach and use of benchmarks.	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.	Unlikely
98.	Basis for distribution assessment of direct impacts.	Paraph 5.3.9 states that the impact estimates on the basis of residency	The Applicant to confirm the date of pass holder information used.	Unlikely

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
		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.		
Health and Wellbeing				
99.	Potential adverse impact on the health of West Sussex communities including vulnerable groups during construction and operational phases of the Project	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.	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.	Uncertain
100.	Limited local intelligence and insight into the planning assumptions of the Project, specifically how this may influence local communities and vulnerable populations	There is no evidence of how community engagement with the affected communities has influenced the outcome and any mitigation made in the Applicants' assessments.	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
101.	Potential increased demand on local health care services	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	It is recommended that the Applicant provides clarity in relation to the points identified above.	Uncertain

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
		for this group within secondary care A&E services is unclear.		
102.	Potential to adversely impact air quality during construction and operational phases.	Also, 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.	Reference is made to the required changes and mitigation measures as reported in this LIR, section 15- Air Quality. The Authorities support UKHSA recommendations in relation to air quality and clarity needed from the Applicant.	Uncertain
103.	Potential adverse noise impacts on health during construction and operational phases	Reference is made to the required changes and mitigation measures as reported in this LIR, section 16- Noise and Vibration. Increase in operations and flights, leading to an increase in noise are likely to adversely impact health. The increase is expected to rise by approx. 13 million passengers per annum (mppa) by 2047.	UKHSA (RR-4687) notes limitations in the Applicant’s assessment of noise and evidence of effectiveness in relation to some of the mitigations. The Authorities support UKHSA recommendations in relation to air quality and clarity needed from the Applicant.	Uncertain
104.	Potential impact on healthy lifestyle behaviours due to land take at Riverside Garden Park and Church Meadows	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	The Applicant should assess the potential for proposed changes to the recreational space that may adversely impact on people’ ability to maintain health and wellbeing. Additionally, the impact, and assessment of noise in recreational areas requires further understanding, ideally through engagement with communities to understand local views and concerns.	Uncertain

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
		on the ability to safely undertake physical activity for example		
Overarching areas of concern				
105.	Concerns about dDCO wording.	WSCC provided comments on the dDCO in [the Joint West Sussex LIR, Appendix M (REP1-069), Principal areas of disagreement remain in relation to various articles and schedules within the dDCO.	The Applicant to engage in discussions regarding the current dDCO wording and proposed amendments in Appendix M of the LIR.	Uncertain
106.	Draft S106 agreement.	A draft of the S.106 agreement was shared on 1st February 2024, and negotiations are underway between Sharpe Prichard and the Applicants' legal representatives. WSCC has concerns regarding the limited scope of the proposals.	The Applicant to engage in discussions regarding the draftS106 Agreement.	Uncertain
107.	The proposals to mitigate impacts of airport growth.	WSCC has concerns that the proposals to mitigate the impacts of airport growth are not environmentally focussed.	The proposals to mitigate should be delivered following the environmentally-focused principles of 'Green Controlled Growth', as proposed in the recent Luton Airport DCO.	Uncertain

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Principal Areas of Disagreement Summary Statement
West Sussex County Council (IP 20044715)
Submitted on Deadline 2 – 26 March 2024