

Gatwick Northern Runway Project (Project Reference: TR020005)

Principal Areas of Disagreement Summary Statement (PADSS) – Version 2

East Sussex County Council (Registration Identification Number: 20044514)

Deadline 2: 26 March 2024

This PADSS report has been prepared by East Sussex County Council (ESCC), with input from the joint authorities and appointed consultants where required. This document identifies the initial principal areas of disagreement that have been identified when reviewing Gatwick Airport's (GAL's) Development Consent Order (DCO) documentation and is an update of Version 1 (AS-062).

It should be noted that the PADSS have been reviewed without reference to the Applicants project changes to the DCO, which were accepted into the Examination by the Examining Authority (ExA) on 8 March 2024. Any commentary on these changes will be provided via a Written Representation to be submitted at Deadline 3 and considered in the next version of the PADSS which are to be submitted at Deadline 5.

Principal Areas of Disagreement Summary Statement (PADSS) from East Sussex County Council			Version Number: 1 Submitted at: October 2023	Updated: March 2024
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1	The capacity deliverable with the Northern Runway Project (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.	<p>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.</p> <p><u>Update:</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>	Uncertain – subject to GAL transparently undertaking and sharing the relevant simulation modelling.

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2	<p>The forecasts for the use of the NRP are not based on a proper assessment of the market for GAL, 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.</p>	<p>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.</p> <p>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</p>	<p>Robust market analysis and specific modelling of the share of demand that might be achieved at GAL 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.</p> <p><u>Update:</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>	<p>Uncertain – subject to GAL producing robust modelling to underpin its forecasts of demand.</p>

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		runway would be delivered at Heathrow.		
3	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area.</p> <p>The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</p>	<p>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.</p> <p>The national economic impact assessment should robustly test the net impact of expansion at GAL having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</p> <p><u>Update:</u></p> <p><u>Please note: Work is ongoing between York Aviation and the</u></p>	Uncertain – subject to remodelling of impacts by GAL.

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			<u>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> Update:	
Transport & surface access				
4	4.3 Regional and Local Planning Policy Context of the Transport Assessment	Reference is made to LTP3 for East Sussex County Council, but no mention of the relevant objectives/ policies/ approaches contained within	The LTP3 specifically includes: • The rail network and standard of train services in the county are restricted by shortcomings in the infrastructure which affects east/west movements along the coastal corridor, connections to Brighton, Ashford and GAL, and also	Likely

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			<p>between Hastings and London.</p> <ul style="list-style-type: none"> • Restricted rail network affecting connections to GAL • Improvements to the A23 and GAL 	
5	Public transport: rail of the Transport Assessment	The model contains all rail services in the modelled area. However, the assessment focuses on services on the North Downs Line, Arun Valley Line and Brighton Main Line	The applicant should include the East Coastway line between Brighton and Hastings as a key corridor to join the BML for access to GAL	Uncertain – potentially subject to remodelling <u>or</u> well evidenced acceptable justification as to why this has not been included
6	Page 36 (12-33) of the Transport Environmental Statement	Reference to East Sussex CC comment in PEIR to Extend scope of modelling to include Ashdown Forest. The Area of Detailed Modelling includes the Ashdown Forest area.	<p>Not clear whether this includes all the relevant Ashdown Forest area. Wish to see a map of the modelled area for clarification.</p> <p><u>Update:</u></p> <p><u>GAL have confirmed in the March 2024 SOCG (with ESCC)</u></p>	Uncertain – potentially subject to remodelling

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			<p><u>that the transport modelling covers a large area which includes all roads in neighbouring Districts and Ashdown Forest, as indicated in Diagram 5.3.3 of the Transport Assessment.</u></p> <p><u>Whilst GAL has sought to assess the impacts of the NRP on Ashdown Forest, and cites the impacts, ESCC requires measures that reduces traffic through sensitive locations near and through Ashdown Forest - which is a Special Area of Conservation (SAC) / Special Protection Area (SPA) – to be considered and introduced.</u></p> <p><u>The route through Ashdown Forest (via Sharpethorne) is a key route to the airport and avoids travel along the A22, which is our preferred strategic route to the airport.</u></p>	

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7	5.4.1: Surface Access Commitments (Doc Ref. 5.3)	<p>Whilst we support the proposals for bus service improvements between GAL Airport and East Sussex there is scope for further improvements</p> <p>With there being no direct rail connections from much of East Sussex, and therefore the only option for passengers / employees to travel to the airport by private car / taxis, there must be investment into bus services to provide a public transport alternative</p> <p>Bus service improvement</p>	<p>Would like to see:</p> <ul style="list-style-type: none"> • Crowborough – GAL route to run via Forest Row and East Grinstead (in combination with an Uckfield – Forest Row – East Grinstead – service would double the frequency between Forest Row and GAL) • extend the 261 route beyond East Grinstead to provide a direct service between Uckfield and GAL • Extend the proposed Gatwick-Uckfield service to Heathfield • Extend bus operational times to include early mornings, evenings and weekends <p>Consideration given to Heathfield being an extension to the Uckfield – Gatwick service.</p>	Uncertain – dependent upon funding

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			Important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield	
8	Surface Access Commitments (SACs) and target mode shares	<p>Concerns are held about the Surface Access Commitments that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these targets. Some of the concerns 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 (Paragraph 12.6.11 ES Chapter 12 Traffic and Transport). 	<p>Surface Access Commitments and associated mitigation to be reviewed and amended.</p> <p><u>Update:</u></p> <p><u>ESCC require GAL to clarify how bus service improvements could be funded through the Sustainable Transport Fund (STF).</u></p> <p><u>ESCC are inclined to seek the securing of bus service enhancements through a legal agreement as part of the DCO process. There is concern that the STF is not legally binding and therefore the bus service improvements as requested run the risk of not being</u></p>	TBC

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		<ul style="list-style-type: none"> 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 infrastructure to successfully meet some of the target modal splits. <p>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</p>	<p><u>introduced via the STF approach.</u></p> <p><u>GAL provide a long term Masterplan which will consider surface access improvements from East Sussex to Gatwick Airport as airport passenger numbers increase, and as public transport opportunities and demand increases.</u></p> <p><u>Update:</u></p> <p><u>Have included in our LIR response (para 4.6.4) that ESCC are: 'supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the existing SAC framework and would still deliver the outcomes that</u></p>	

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		<p>applicant has not assessed or considered the attractiveness of modes or how this could be increased. For example, by providing enhanced bus priority measures to provide journey time savings.</p>	<p><u>GAL desire. An approach has similarly been considered in respect of the Luton Airport DCO and is referred to as Green Controlled Growth, whereby growth is only permitted after targets have been met'.</u></p>	
<p><u>9</u></p>	<p><u>Impact of increased passenger and employee numbers associated with Gatwick Airport NRP on local road network</u></p>	<p><u>Concern over impact of additional car journeys on the road network to Gatwick Airport, leading to increased congestion, longer journey times, increase in emissions.</u></p> <p><u>Concern over the assessment of transport modal share for air passengers and the impact on the road network, including the knock on effects from other authorities.</u></p>	<p><u>GAL needs to mitigate the impacts of approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264 which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport.</u></p> <p><u>ESCC support West Sussex County Council's request for</u></p>	<p><u>Uncertain</u></p>

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			<p><u>a sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, which Diagram 6.2.4 of the Transport Assessment [AS-079] indicates has been fairly consistent since 2012. There is concern that the 55% public transport mode share targets are too ambitious. Having a sensitivity analysis will enable WSCC to fully understand the effects on their road network, and for ESCC to consider whether these impacts would have repercussions on the East Sussex road network.</u></p>	
<u>10</u>	<u>Impact of increased airport capacity on the rail</u>	<u>There is concern that rail infrastructure and service provision has not been properly considered by</u>	<u>There is no funding associated with rail mitigation in GAL’s proposals (like there is for highways). As outlined</u>	<u>Uncertain</u>

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	<p><u>network arising from additional employees and passengers going to and from the airport</u></p>	<p><u>GAL. There is a risk that Network Rail's infrastructure, and the service pattern that may not be able to accommodate the increase in demand and capacity from passengers / employees that will arise should the NRP become operational. This must be considered alongside wider demands for rail travel.</u></p>	<p><u>in Table 5 (T3 & T4) in the ESCC LIR. We wish to see Gatwick's level of commitment to highways extended to rail.</u></p> <p><u>GAL state that the rail network has sufficient capacity. However, we understand NR will be undertaking their own modelling to assess the validity of this statement. ESCC support Network Rail's independent modelling work to identify what the impacts of the NRP would have on the rail network, and consideration will subsequently need to be given as to how the impacts could be mitigated.</u></p> <p><u>In regard to any mitigation being agreed between the applicant and East Sussex County Council, this should</u></p>	

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			<u>be secured through an appropriate legal agreement or condition of the development consent order and introduced prior to the commencement of the operation of the northern runway.</u>	
Air quality				
11	Missing figures and the lack of clear study area information makes it difficult to understand traffic changes in the different scenarios. This in turn makes it difficult to understand if effects predicted at receptors are reasonable over	<i>Document 5.1, Chapter 13</i> Paragraph 13.5.5 of the ES air quality chapter refers to a 'wider study area' (beyond the 11km by 10km domain), plus the modelled affected road network (ARN) outside this area. This is shown on Figure 13.4.1.4.1.1. The ES Air Quality Figures – Parts 1, 2, 3, 4 and 5 have been reviewed, and this figure cannot be identified.	GAL needs to supply further information to clarify the routes affected in both the construction and operational phases. Additionally, the roads within the 11km by 10km domain which have met the ARN criteria should be illustrated separately for the construction and operational phases. This will inform our understanding of where the greatest air quality effects should be anticipated in this domain.	Likely

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	the construction and operational phases.	Currently, figures within Part 3 just show a wider study area domain, not the actual roads meeting the ARN criteria (e.g. Appendix 13.6.1 Figure 2.3.1). This figure should be provided to illustrate the affected road network. No further information on the road traffic air quality study was identified in ES Appendix 13.4.1: Air Quality Assessment Methodology. However, reference to the above missing figure is made within this ES Appendix document, suggesting it has been missed in the collation of this ES Appendix.	Update: <u>Please note: For all 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 ESCC is unable to update the resolution status or otherwise on 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.</u>	
12	The scenarios assessed in the	<i>Document 5.1, Chapter 13</i>	GAL needs to clarify how:	Uncertain

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	Environmental Statement do not provide a realistic worst-case assessment.	<p>Several clarifications are required to understand the Assessment Scenarios sub-section of the chapter. Paragraph 13.5.23 includes a bullet point list of assessment scenarios, including scenarios covering 2029 for both the construction and operation of the proposed development.</p> <p>Paragraph 13.5.24 provides further detail for the 2029 scenarios, noting there are two assessment scenarios for this year. Additional information is provided in paragraph 13.5.25 which reiterates that there are two separate scenarios for operational and construction situations, due to limitations within the traffic modelling.</p> <p>Paragraph 13.5.26 then provides information on a slow</p>	<ul style="list-style-type: none"> • The use of two parallel scenarios for 2029 provides a realistic worst case for evaluation. A single scenario reflecting the anticipated operation of the increased capacity at the airport with the surface access construction works is the realistic worst case in 2029. • Operational activities and ongoing construction work in 2032 have been assessed. • The selection of assessment years and their configuration re operational and construction was made, and how this aligns with the requirements of the Airports National Policy Statement. 	

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		fleet transition case (SFT) relating to airline fleet assumptions, referencing 2029 as the first full year of opening, 2032 as an interim year and 2038 a design year. For the 2032 scenario, no mention is made that some construction works will still be ongoing (See ES Appendix 5.3.3: Indicative Construction Sequencing).		
13	Operational monitoring should be agreed during the examination.	<i>Document 5.1, Chapter 13</i> Operational monitoring will be crucial to understand if measured air quality is following modelled prediction. There is no information in either the air quality chapter or the Surface Access Commitments document on how air quality data will be reviewed to check that changes are in-line with	GAL should agree the details of the s106 operational monitoring, and how this will be used to test the effectiveness of the Surface Access Commitments.	Likely

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		predictions, nor what measures would be taken if a significant adverse deterioration occurred.		
14	Air quality actions are split across multiple documents. A single Air Quality Action Plan is needed.	<i>Document 5.1, Chapter 13</i> Paragraph 13.9.3 states that the operational phase mitigation measures are set out in two documents: the Carbon Action Plan and the Surface Access Commitments. This makes it difficult to identify measures that focus on air quality improvement. This approach differs from previous discussions, where a draft Air Quality Action Plan was provided in 2022.	GAL should draw up an Air Quality Action Plan.	Uncertain
15	Using the application documents, is not possible to relate	<i>Document 13.6.2</i> The receptor tables include most of the expected	GAL should update receptor figures to present receptor IDs. Additionally, a column identifying the local authority	Likely

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	the figures to the results set out in the appendices tables	<p>information, including a receptor ID reference. However, the tables (e.g. Table 2.1.1 and Table 2.4.1) do not identify which figure the receptor listed is shown, as would be typically expected, to allow readers to move between the appendix, chapter and figures.</p> <p>However, as receptors are not labelled by ID this is therefore not possible in this ES. The reader needs to plot the grid references provided to understand where a receptor is.</p>	<p>location for each receptor would be extremely useful.</p> <p>Note: this links to our concerns over the impacts of air quality on Ashdown Forest (which is an area of European Ecological Importance, Special Area of Conservation, and a Site of Special Scientific Interest (SSSI). Need to consider these impacts as part of the modelling work being undertaken (air quality - nitrogen deposition issues arising from additional traffic through Ashdown Forest).</p>	
16	Lack of sensitivity analysis on the anticipated modal shift, and the associated air quality impacts.	<p><i>Document 5.1, Chapter 12</i></p> <p>Paragraph 12.8.6 of the traffic and transport chapter sets out a variety of measures to produce the modal shift assumed with the proposed</p>	GAL should supply further details on their assumptions around off-airport parking (both approved and unapproved), sensitivity of the anticipated modal shift is to any variation in these assumptions, and the air	Uncertain

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		development. Within the assumptions, there are controls on on-site parking numbers, parking charges and forecourt access charges. There is insufficient sensitivity analysis on these figures, including the impact on air quality if they are not achieved.	quality impacts of lower levels of modal shift.	
<u>Greenhouse gases (carbon) emissions</u>				
17	Failure to consider risks raised by the Climate Change Committee, which warns that the UK Jet Zero policy is non-compliant with the UK's net zero trajectory, and the cumulative effects	<i>Document 5.1, Chapter 16</i> Section 16.12.3 states, " <i>Given the overarching contribution to emissions arise from aviation, and the policy context in the UK the reflects the Jet Zero Strategy (Department for Transport, 2022), it is concluded that the overall impacts arising from the Project are not so significant that the Project would have a</i>	GAL needs to analyse and assess the issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory. GAL needs to provide an updated cumulative assessment that considers the combined impact of all planned expansion at major UK airport and how this could impact the UK's net zero	Unlikely

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	<p>of airport expansion plans.</p>	<p><i>material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets. On this basis the overall assessment concludes that the Project has a Minor Adverse Not Significant impact."</i></p> <p><u>This is not a safe assumption. The Government's advisory body for climate change, the Climate Change Committee (CCC), issued concerns around airport expansion as part of their 6th budget report (June 2023). Specifically, they stated that:</u></p> <ul style="list-style-type: none"> The Jet Zero strategy had a "Reliance on nascent technology. The Jet Zero Strategy approach is high risk due to its reliance on nascent technology – 	<p>trajectory in alignment with the IEMA GHG Assessment Guidance (2022).</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.</u></p>	

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		<p><i>especially rapid SAF uptake and aircraft efficiency savings – over the period up to the Sixth Carbon Budget. The Government does not have a policy framework in place to ensure that emissions reductions in the aviation sector occur if these technologies are not delivered on time and at sufficient scale.</i></p> <ul style="list-style-type: none"> • They have concerns around “Airport expansion”. The Committee's Sixth Carbon Budget Advice recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions. Since making this recommendation the Committee has noted that 	<p><u>Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should 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>	

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		<p>airports across the UK have increased their capacities and continue to develop capacity expansion proposals. This is incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate this additional demand. No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects.</p> <p>Given this, the ES has not complied with the IEMA (2022) GHG Assessment significance guidance and has come to the wrong conclusion.</p>		

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		<p>In alignment with the IEMA (2022) GHG Assessment significance guidance, the Project should be considered Major Adverse, which is defined as "the Project's GHG impacts are not mitigated or are only compliant with minimum standards set through regulation, and do not provide further reductions required by existing local and national policy for projects of this type. A project with major adverse effects is locking in emissions and does not make a meaningful contribution to the UK's trajectory towards net zero."</p>		
18	Carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to	<p><i>Document 16.9.1 (table 2.1.1), 16.9.2 (table 2.1.1) and 16.9.4</i></p> <p>Not accounting for WTT is non-compliant with the globally recognised GHG</p>	<p><u>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and</u></p>	Likely

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	<p>the GHG Protocol Standard mentioned in the Environmental Statement methodology.</p>	<p>Protocol Corporate Accounting standard, referenced in the GHG ES Methodology in Section 16.4.18, where scope 3 emissions were included.</p> <p>Furthermore, this also contradicts the GHG ES Methodology referenced under Section 16.4.24, which states “<i>GHG factors are drawn from a range of national and international sources. Where these factors are expected to change over the duration of the Project then a time-based factor is used, based on estimating the extent and rate at which the factor will change. This estimation process draws on industry standards, industry-specific guidance, and a range of other UK and</i></p>	<p><u>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%.</u></p> <p>GAL needs to update the GHG ABAGO assessment to account for WTT emissions.</p>	

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		<p><i>government policy and strategy documents.”</i></p> <p>Additionally, the approach taken goes against the UK Government’s carbon accounting methodology from BEIS (2022)¹, which recommends that “<i>Well-to-tank (WTT) fuels conversion factors should be used to account for the upstream Scope 3 emissions associated with extraction, refining and transportation of the raw fuel sources to an organisation’s site (or asset), prior to combustion.</i>”</p> <p>WTT emissions represent a significant portion of fuel emissions (around 20%) and need to be accounted for.</p>		
17	It is not clear how or if GAL converted CO₂	Document 16.9.4, section 1.2.3	GAL needs to confirm if a conversion was undertaken from CO₂ to CO_{2e}. If not, the	Likely

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	emissions from aircraft to CO₂e.	<p>This states that “The estimation of GHG emissions arising from aircraft is based on estimating fuel consumption for each of the four use categories, and then using an appropriate CO₂ emissions factor per unit of fuel to model total CO₂e emissions”.</p> <p>It is not clear if a conversion was undertaken from CO₂ to CO₂e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023)¹. 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</p>	Applicant should update the GHG Aviation Assessment to account for this.	

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

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		estimated to be released (Table 5.2.1).		
19	GAL does not identify the risks associated with using carbon offset schemes.	<p><i>Document 5.4.2, Section 1.14</i></p> <p>This states that, "<i>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.</i>"</p> <p>The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should</p>	<p>GAL should show complete transparency and state the offset scheme they intend to use.</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>	Likely

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		specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme.	<ul style="list-style-type: none"> • <u>additional in that would not have occurred in the absence of the project</u> • <u>monitored, reported and verified</u> • <u>permanent and irreversible</u> • <u>without leakage in that they don't increase emissions outside of the proposed development</u> • <u>Have a robust accounting system to avoid double counting and</u> • <u>Be without negative environmental or social externalities.</u> 	
20	GAL indicates it is relying upon Renewable Energy Guarantees of Origin ("REGO") to achieve its Net	<p>Document 5.4.2 (section 3.1.2)</p> <p>This states "For emissions that occur outside the Gatwick Airport site boundary where GAL can make an impact, we</p>	GAL should address the concerns around relying on REGO's to make the claim that GAL will "achieve Net Zero for GHG emissions under our control (GAL Scope 1 and 2) by 2030. Gatwick will achieve zero	Likely

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	<p>Zero and Zero Carbon commitments. However, purchasing REGO certificates does not necessarily reduce emissions from grid electricity consumption to zero.</p>	<p><i>have already taken action, such as electing to purchase 100% Renewable Energy Guarantees of Origin ("REGO") electricity since 2013 and installing 22 charging points for airport ground operation vehicles in 2019 (Ref. 1.6)."</i></p> <p>The guidelines for the UK Government Streamlined Energy and Carbon Reporting (SECR) advise, "<i>Where organisations have entered into contractual arrangements for renewable electricity, e.g. through Power Purchase Agreements or the separate purchase of Renewable Energy Guarantees of Origin (REGOs), or consumed renewable heat or transport certified through a Government Scheme and wish to reflect a reduced</i></p>	<p><i>emissions for GAL Scope 1 and 2 GHG emissions by 2040 for scope 1 and 2 by 2040".</i></p> <p><u><i>Aligned with SECR, GAL's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for REGOs. This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.</i></u></p> <p><u><i>GAL should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.</i></u></p>	

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		<p><i>emission figure based on its purchase, this can be presented in the relevant report using a "market-based" reporting approach. It is recommended that this is presented alongside the "location based" grid-average figures and in doing so, you should also look to specify whether the renewable energy is additional, subsidised and supplied directly, including on-site generation, or through a third party."</i></p>		
20	<p>It is not clear if construction electrical energy consumption emissions were considered in the ES.</p>	<p>Document 16.9.1</p> <p>Calculations or an estimate on electrical energy use during construction should be calculated as part of the construction GHG Assessment. Without this, the energy related emissions in the ES for construction are potentially underreported.</p>	<p>GAL needs to update the GHG Construction assessment to account for electrical energy use during construction.</p>	Likely

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21	BEIS 2023 GHG intensity factors are not used as a data source for the Future Baseline.	Document 16.9.2 (table 3.2.1) For the Green Book Supplementary Guidance, BEIS (2023) emission factors are used, contradicting the BEIS (2022) GHG intensity factors stated in Table 3.2.1.	GAL needs to explain why the GHG intensity factors and future grid electricity carbon factors were not aligned from the 2023 database.	Likely
21	<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</u>	<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>	<u>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure.</u> <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>	<u>Uncertain</u>

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	<u>meeting its net zero targets cannot be identified.</u>			
Climate change (impacts)				
	Inconsistency and lack of detail in some climate impact statements.	Document 5.1 (tables 15.8.5 and 15.8.6) The climate impact statements (detailed in Table 15.8.5 and Table 15.8.6) are lacking in consistency in the way they are articulated in that some are missing an 'impact.' They have a cause e.g. 'increased flooding' and an 'event' e.g. flooding of electrical equipment' but no end 'impact' e.g. resulting in increased maintenance requirements OR resulting in operational downtime. This result is what should determine the consequence rating and the approach taken	GAL should update all climate impact statements to have a clear end impact so that all risks are described in a consistent way. <u>Note: this has been deleted as has been addressed in the SoCC.</u>	Uncertain.

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		could have led to an underestimation of risk.		
22	Mitigation measures are needed to reduce the impact of Urban Heat Island (UHI) effect.	<i>Document 15.5.2</i> 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 any specific mitigation measures, e.g. additional vegetation or water bodies could be proposed at this stage to minimise impacts.	GAL should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	<u>Likely Addressed</u>
<u>Socio economics Economy</u>				
23	Concern over lack of consideration of economic impacts on East Sussex	It is unclear what the economic impacts of the NRP on East Sussex would be	There is a need for the applicant to fully set out the economic impacts of the Northern Runway proposal. There is a need to further understand the employment	Uncertain

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			and skills offer arising from the NRP. We would expect substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that the airport work with local training providers and colleges in East Sussex to ensure that training, pathways and careers opportunities are offered.	
24	Concern over lack of consideration of economic impacts on East Sussex	Need for reassurances that the subcontractors are delivering social value and working to the appropriate benchmark and procurement frameworks	GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff) Sub-contractors should work to the CITB national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement	Likely
25	Concern over lack of	The Employment Skills and Business Strategy (ESBS)	Include information in the ESBS to cover this	Likely

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	consideration of economic impacts on East Sussex	should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.		
26	Concern over lack of consideration of economic impacts on East Sussex	In non-construction, the option should include upskilling existing workforce which includes residents of East Sussex	Include upskilling existing workforce in the ESBS	Uncertain
27	Concern over lack of consideration of economic impacts on East Sussex	There is a need to ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.	Social value element in SME/Sub-contractor contracts mirror provision in GAL's ESBS	Likely
28	Concern over lack of consideration of economic impacts on East Sussex	GAL should develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should develop	Development of Inward Investment Service and Strategy by GAL	Uncertain

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		(not just promote) international trade opportunities with destinations aligned to LGW's route network		

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
Noise <u>and vibration</u> impacts on East Sussex				
29	Lack of detail on noise impacts for East Sussex	Concerned that the impacts of noise on East Sussex communities has not been adequately addressed and assessed, and that appropriate mitigations will not be in place	Expect GAL to provide greater clarity on how many more flights would be passing over East Sussex, which locations would be the most affected and how this would be mitigated. This includes paying particular attention to sensitive and protected areas, such as Ashdown Forest.	Likely
30	Clarification on estimated overflight mapping	There is a need for assurances on the accuracy and reliability of the estimated overflight mapping, and we will require East Sussex to be included as part of this.	GAL to respond on this point. If East Sussex has not been included we would wish the overflight mapping to be revisited to include the county, and the results updated and	Uncertain

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			shared as appropriate for consideration.	
31	Capping of night flights to protect local communities	Concern that the use of the northern runway will increase the negative impacts of aircraft noise on local communities at night – impacting detrimentally on physical and mental health and wellbeing.	Night flights will need to be restricted / capped, and the Northern Runway should not operate, between the hours of 23:00 and 06:00. We need assurances that there are not dispensations that GAL can routinely operate within this restricted night-time period, notwithstanding use of aircraft at night for emergencies.	Uncertain
Legislation, policy and guidance				
32	Interpretation of the Overarching Aviation Noise Policy	Paragraph 14.2.44 of the Environmental Statement Chapter 14 Noise and Vibration – sharing the benefits	It should be demonstrated as part of the Noise Envelope how the noise benefits of future aircraft	Uncertain

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		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.	technology are shared between the airport and local communities. This is a policy requirement set out in the Aviation Policy Framework.	
Assessment of significant effects – Air Noise				
33	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.	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
34	The assessment switches between discussing properties and population depending on whether noise is between LOAEL and SOAEL (population) or above SOAEL (properties)	The assessment should cover both properties and population and be consistent when identifying significant effects to aid their understanding.	Provide an assessment of likely significant air noise effects covering both properties and population.	Likely
35	Identification of population exposed to noise above SOAEL and between LOAEL and SOAEL	It is not clear what population is exposed to changes in noise above SOAEL and between LOAEL and SOAEL in Table 14.9.10 and 14.9.11	It would be helpful to provide tables identifying the population exposed to changes in air noise at absolute noise levels between LOAEL and SOAEL and for population experiencing absolute air noise levels exceeding SOAEL	Likely
36	Properties that are newly exposed to noise levels exceeding the SOAEL are not identified	It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine	Identify how many and the location of properties newly exposed to noise levels exceeding the SOAEL	Likely

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		compliance with the first aim of the ANPS		
37	Paragraph 14.9.98 of the Environmental Statement Chapter 14 Noise and Vibration states that there would be reduced movements on the main runway resulting in Minor Beneficial effects	It is not clear is these Minor Beneficial effects would continue through the project lifespan when more capacity is taken up and the main runway may return to current intensity of operations	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Likely
38	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.	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Likely
39	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;	Provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of	Uncertain

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		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.	secondary metrics warrant identifying a likely significant effect.	
Document name: Appendix 14.9.2 Air Noise Modelling				
40	Assurances that areas of East Sussex below 7,000 feet have been included in the air noise modelling work	Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level.	It is understood that some aircraft (GAL related air traffic) do pass over parts of East Sussex below 7,000 feet. Therefore we require such areas to be included as part of the air noise modelling work. For example, Crowborough which has areas which are 794 feet above sea level. Also, Ashdown	Likely

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			Forest which is a noise sensitive area.	
41	No details on the 92-day summer average aircraft fleet for each scenario are provided	It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets	Provide aircraft fleets for each modelled scenario	Likely
42	No details of the noise modelling or validation process 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	Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided	Uncertain
43	No details of measured Single Event Level or LASmax noise data from the Noise-Track-Keeping are provided	Measured Single Event Level and LASmax noise data should be provided for individual aircraft variants as it is key	Provide Single Event Level and LASmax noise data for individual aircraft variants	Uncertain

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		information used when defining the aircraft noise baseline.		
Document name: Appendix 14.9.7 The Noise Envelope				
44	Slow fleet transition noise contour area limits	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	Noise contour area limits should be based on the Central Case	Unlikely
45	Annual noise contour limits	Noise contour area limits relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period.	Annual noise contours should be included in the Noise Envelope	Uncertain

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46	Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	GAL wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope	There should be no allowance for the Noise Envelope limits to increase	Uncertain
47	CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for local authorities to review Noise Envelope reporting, take action against breaches or review any aspects of the Noise Envelope	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

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48	Adoption of an action plan	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	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.	Uncertain
49	Capacity declaration restrictions as a means of managing aircraft noise	This would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year	Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation	Uncertain
Document name: Appendix 14.9.8 Noise Envelope Group Output Report				
50	Airbus NEOs (New Engine Option) are stated to be up to 5 dB quieter departure and 3 dB quieter on approach.	This statement is misleading as these levels of noise reductions are not	Provide a more realistic reduction in noise that is provided the NEO aircraft	Likely

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		<p>achieved by Airbus A320Neo or A321Neo, which are the main Airbus variants that will be operational at GAL in the future.</p>		