Gatwick Airport Northern Runway Project

Planning Statement Appendix D – Sustainability Statement

Book 7

VERSION: 2.0

DATE: APRIL 2024

Application Document Ref: 7.1

PINS Reference Number: TR020005

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Executive Summary

This Sustainability Statement has been prepared on behalf of Gatwick Airport Limited (GAL) to accompany the application for development consent to make best use of Gatwick Airport's existing runways and infrastructure. The Project proposes alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. The Project includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput.

The Sustainability Statement demonstrates that the principles of sustainability have been considered during the design of the development and explores how these will be further embedded throughout its lifecycle, in accordance with relevant national, regional and local documents, guidance and standards. The Sustainability Statement addresses various aspects of sustainability, considering all three pillars: social, economic, and environmental.

The construction and operation of the Project would generate economic benefits in the local economy. The construction phase would generate employment opportunities for local skilled tradesmen and opportunities to develop the local skills base through the Employment, Skills and Business Strategy. The Project is expected to lead to the generation of operational employment, which would also lead to an increased demand for community facilities and services. As a result, there could be indirect benefits for local businesses, which can help drive further investment and attract additional businesses to the local area.

The Project would ensure that mitigation measures are in place to minimise detrimental impacts on air quality, lighting, ground contamination and human health, which aligns with national policy that considers the promotion of healthy communities and control of pollution. Where there would be impacts on residential properties, due to increased noise pollution, the Project includes appropriate design and mitigation measures. These include noise barriers, traffic management measures, speed reductions on the highway, and a noise insulation scheme.

During construction, there would be a number of traffic management measures, including the implementation of a Construction Traffic Management Plan and temporary diversion routes for traffic and pedestrians to ensure safety. In terms of operational transport, the Project is not expected to generate substantial traffic flows beyond the existing levels on the local highways. Surface Access Commitments have also been developed, which affirm GAL's commitment to encouraging sustainable modes of transport such as public transport, cycling and walking. Together with improvements to the highways infrastructure, which would facilitate greater capacity. This would allow the development to support the increased transport associated with the increased operational capacity of the airport, whilst encouraging of other modes of transport. There would not be any significant adverse impacts associated with increased operational traffic and thus, the Project would align with key principles of the NPPF, ANPS and the NNNPS.

The development has been designed to create a high-quality built environment, and applies key design principles such as prioritising development of previously developed land, sustainable design considerations, and security. The main components of the Project would reflect the existing airport environment and proposed earthworks would be designed to provide visual screens and opportunities for the creation of diverse habitats. In terms of security, proportionate protective security measures are included within the existing Gatwick security arrangements, which will not be compromised by the Project.

As part of the consultation process, the Applicant has used various methods to engage with the local community, to inform the local community about the Project and take on board any concerns or issues raised by consultees. Additionally, GAL will require contractors to develop a Communications and

Engagement Plan to ensure that all stakeholders are aware of the activities during the construction phase and are kept informed.

A Flood Risk Assessment was carried out to assess the flood risk of the Project site. It also presents the drainage strategy for the site in accordance with relevant guidance. Parts of the site are considered to be at high risk of fluvial and surface water flooding. The surface water flood risk will be managed by contractors during the construction phase. The Project would involve changes to the existing site, with an increase in the volume of impermeable surfaces and thus, increased surface water risk. However, the design of the Project has incorporated a number of mitigation techniques and strategies to ensure the site remains resilient to future changes in precipitation levels and flooding, without increasing flood risk elsewhere. The Project also includes opportunities to adapt to potential climate changes through measures, such as cooling and ventilation systems.

The construction and operation of the Project would include the sustainable management of waste and resources. The proposal also includes sufficient waste management capacity through the demolition and replacement of the existing Central Area Recycling Enclosure. A Construction Resources and Waste Management Plan has been developed, which sets out measures for managing waste during construction.

In terms of carbon emissions generated during construction, the Project would result in the generation of GHG emissions. However, a Carbon Action Plan (**ES Appendix 5.4.2: Carbon Action Plan** (Doc Ref. 5.3))has been developed which adopts best practice and includes a budget on GHG emissions during construction.

Carbon emissions generated during the operation of the Project would be primarily associated with aviation emissions, as well as emissions from surface access and airport buildings and ground operations. However, the Carbon Action Plan sets out GAL's commitments to carbon reduction and to playing its part in meeting the Government's carbon reduction commitments. It commits to Net Zero by 2030 for Gatwick's Scope 1 and 2 GHG emissions and sets commitments for carbon reduction for each area of carbon generation. The Surface Access Commitments (**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)) comprises commitments to achieve aspirational mode share targets and thus, encourage sustainable transport.

The Project has ensured the protection and enhancement of the natural environment through the conservation of important species. This includes measures proposed for the construction phase that will be managed through the Code of Construction Practice (**ES Appendix 5.3.2: Code of Construction Practice (**Doc Ref. 5.3)) to ensure that harm to the natural environment is avoided. This includes protective fencing, directional lighting, and pollution prevention measures. The Project has been designed to avoid designated sites and it incorporates a number of mitigation measures within the design to ensure the protection, enhancement and compensation of features that provide high value habitat for birds, bats, amphibians, reptiles, and other species. These would support relevant national policy that highlights the importance of promoting biodiversity and conservation of habitats and species.

In terms of landscape impacts, the Project would be seen in the existing context of the settlement of Crawley and the existing airport. The design includes the retention of green infrastructure assets, where possible, to minimise impacts on surrounding landscapes. The Project also includes proposed earth shaping, embankments and cuttings or bunds to provide visual screens and opportunities for the creation of diverse habitats. An outline Landscape and Ecology Management Plan (**ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc. 5.3)) has been developed to provide details of the overarching landscape and ecology strategy of the Project. Overall, this would ensure that the Project integrates the existing landscape features into the development, whilst promoting biodiversity and enhancing the local landscape.

In considering the historic environment, there is a conservation area situated partially within the Project site. There would be some temporary effects to the setting of the Church Road Conservation Area during the construction phase. Mitigation measures include the Operational Lighting Framework and planting proposals to reduce visibility of proposed buildings. The Project design includes the enhancement of the conservation area through measures to increase public access and the creation of an area for informal recreational use, as well as additional planting.

It can be concluded that together, the site location, design and proposed mitigation measures would enable the Northern Runway Project (NRP) to be developed and operated in line with the principles of sustainable development in a manner which supports the three pillars of sustainability and which is in line with the objectives of relevant local and national planning policies and principles.

1 Introduction

1.1 General

1.1.1 This Sustainability Statement has been prepared on behalf of Gatwick Airport Limited (GAL) to accompany the application for development consent to make best use of Gatwick Airport's existing runways and infrastructure (referred to within this report as 'the Project'). The Project proposes alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. The Project includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput capacity.

1.2 Purpose of the Sustainability Statement

1.2.1 The purpose of the Sustainability Statement is to demonstrate that the principles of sustainability have been considered during the design of the Project and to show how these would be further embedded throughout its lifecycle, in accordance with relevant national, regional and local policy, guidance and standards.

1.3 Scope of the Sustainability Statement

1.3.1 The scope of the Sustainability Statement is informed by relevant national, regional and local policy and guidance documents. Internal policy documents and GAL strategies have also been considered to ensure the development supports and exceeds, where feasible, current objectives and targets. In preparing this statement consideration has been given to the following documents which have informed the scope of this statement:

Legislation

- Planning Act 2008;
- Climate Change Act 2008;
- Infrastructure Planning (Environmental Impact Assessment) Regulations 2017; and
- Environment Act 2021.

National Policy

- Airports National Policy Statement (ANPS) (Department for Transport, 2018a);
- National Policy Statement for National Networks (NNNPS) (Department for Transport, 2015);
- National Planning Policy Framework (NPPF) 2021 (Ministry of Housing, Communities and Local Government, 2021);
- Aviation Policy Framework 2013 (Department for Transport, 2013);
- Beyond the Horizon: The future of UK Aviation (HM Government, 2018);
- Flightpath to the Future (Department for Transport, 2022a);
- Jet Zero Strategy: Delivering net zero aviation by 2050 (Department for Transport, 2022b);

- Decarbonising Transport: A Better, Greener Britain (Department for Transport, 2021);
- Noise Policy Statement for England (Department for Environment, Food & Rural Affairs, 2010);
- National Infrastructure Strategy 2020 (HM Treasury, 2020);
- The Sixth Carbon Budget: The UK's path to Net Zero; and
- A Green Future: Our 25 Year Plan to Improve the Environment (Department for Environment, Food & Rural Affairs and Secretary of State for Levelling Up, Housing and Communities, 2021).

Local Policy

- Crawley 2030: Crawley Borough Local Plan 2015-2030 (Crawley Borough Council, 2015)
- Draft Crawley Borough Local Plan 2021-2037: Regulation 19 Consultation (Crawley Borough Council, 2021)
- Reigate and Banstead Local Plan: Core Strategy (Reigate and Banstead Borough Council, 2019a)
- Reigate and Banstead Local Plan Development Management Plan (Reigate and Banstead Borough Council, 2019b)
- Mole Valley Core Strategy (Mole Valley District Council, 2009)
- Mole Valley Local Plan (Mole Valley District Council, 2000)
- Draft Future Mole Valley 2020-2037: Proposed Submission Version (Mole Valley District Council, 2022)
- Tandridge District Core Strategy (Tandridge District Council, 2008).
- Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (Tandridge District Council, 2014)
- Our Local Plan: 2033 (Regulation 22 Submission) (Tandridge District Council, 2019)

Gatwick Policy

- GAL's Sustainability Policy: Our Second Decade of Change to 2030 (Gatwick Airport Limited, 2023).

1.4 Structure of the Sustainability Statement

Process

1.4.1 Consideration of the Project's process for embedding core sustainability principles as part of the design evolution has centred around three stages.

Stage 1: Development of Outline Sustainability Framework and Initial Appraisal

1.4.2 The first part of this process involved the development of an outline sustainability framework, consisting of a series of themes and objectives which provide the basis for the appraisal (See bullet points within paragraph 1.5.12). This was completed as part of the PEIR. Initial discussion with key topic specialists and design team members embedded relevant core sustainability principles and identified potential gaps in the assessment and proposed mitigation or compensation measures as part of the Project.

Stage 2: Updated Sustainability Framework and Initial Appraisal

1.4.3 Following on from the development of the outline sustainability framework, the second stage involved further improvement of this framework with regard to specific new and updated policies, stakeholder consultation on the PEIR and an initial appraisal of the Project against this framework.

Stage 3: Final Sustainability Statement

1.4.4 The final Sustainability Statement (this document) has been informed by the work completed through the sustainability framework (Stages 1 and 2) and summarises the findings of the sustainability appraisal and seeks to demonstrate how the Project accords with relevant sustainability objectives.

Context and Structure

1.4.5 The ANPS presents the need for increased airport capacity in the south east of England by 2030 and provides an understanding on how it will be achieved. The document is accompanied by an Appraisal of Sustainability, which assesses the potential impacts (environmental, social and economic) of the policy. The Appraisal of Sustainability focuses on twelve main themes, which represent the key factors that are likely to be impacted by increased airport capacity and the ANPS. These core factors are:

- community;
- quality of life;
- economy;
- noise;
- biodiversity;
- soil;
- water;
- air quality;
- carbon;
- resources and waste;
- historic environment; and
- landscape.

1.4.6 The NPPF introduced the presumption in favour of sustainable development (Ministry of Housing, Communities and Local Government, 2021).

'For plan-making this means that:

(a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

(b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas 6 , unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.' (paragraph 11 of the NPPF).

1.4.7 The overall aim of the NPPF is to meet objectively assessed needs in an environmentally responsible way; it is not to allow development at any cost. The NPPF identifies objectives for the following key topics:

- Building a Strong, Competitive Economy;
- Vitality of Town Centres;
- Strong, Healthy and Safe Communities;
- High Quality Communications;
- Sustainable Transport;
- Effective Use of Land;
- Well Designed Places;
- Protecting Green Belt;
- Sustainable Use of Minerals;
- Climate Change & Flood Risk;
- Conserving & Enhancing the Natural Environment; and
- Conserving & Enhancing the Historic Environment.

1.4.8 The core themes of the ANPS Appraisal of Sustainability and NPPF, as well as other relevant policy, have formed the main structure of this sustainability statement, which is presented within Diagram 1.1. Six key intended outcomes have been identified (See Diagram 1.1), which are consistent across the relevant ANPS and NPPF headline objectives: These key topics have formed the structure of this Statement.

- Strong Economy;
- Strong, Healthy and Safe Communities;
- Sustainable Transport;
- Effective and Well Designed Places;
- Climate Change and Resilience;
- Greenhouse Gases; and
- Conserving and Enhancing the Natural and Historic Environment.

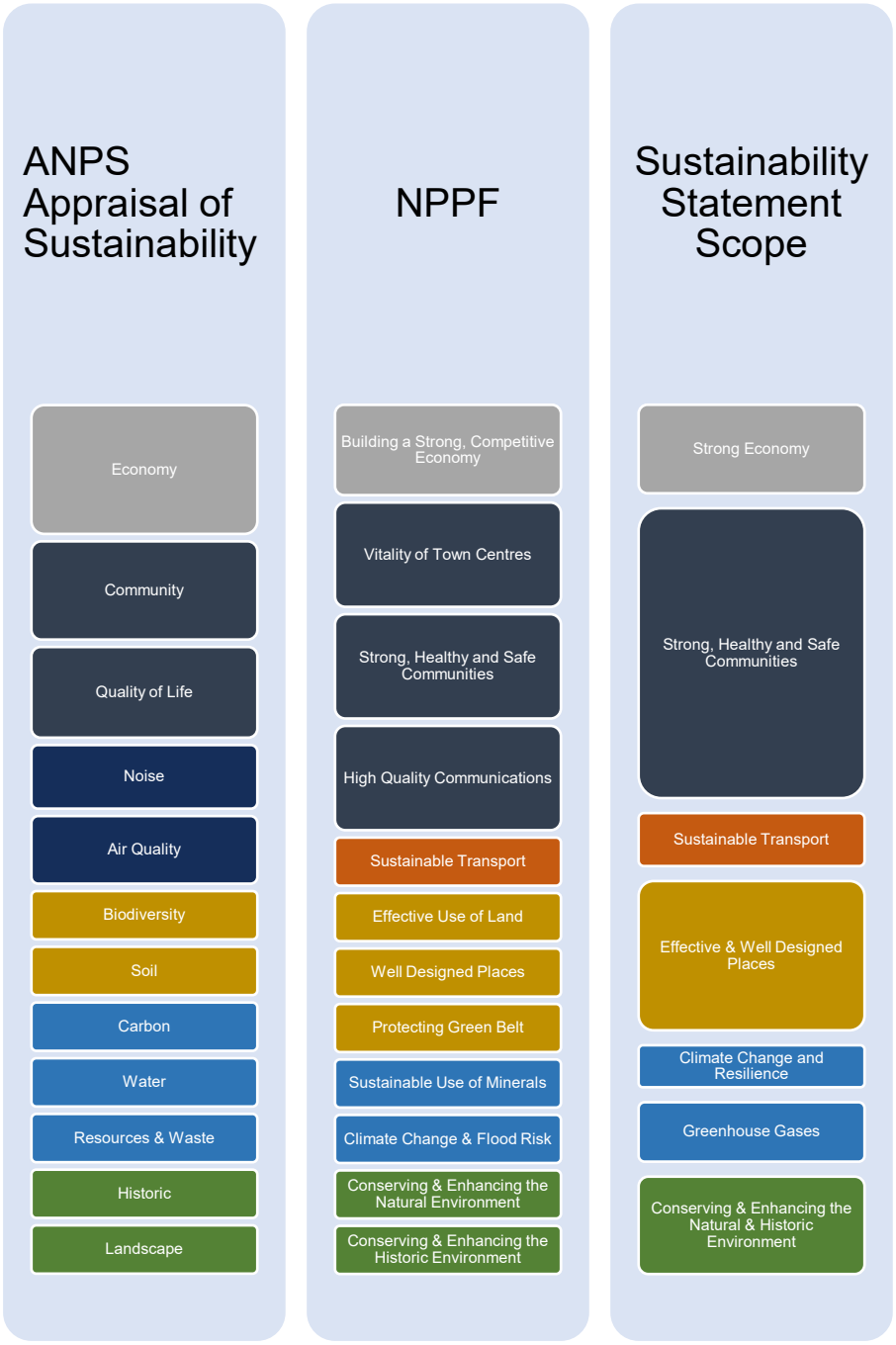

Diagram 1.1: Flow Diagram demonstrating the key themes of the ANPS and the NPPF, which have informed the framework of this Sustainability Statement.

1.4.9 GAL has laid out the focus areas for sustainability in its Second Decade of Change to 2030. The core themes within the Second Decade of Change to 2030 and relevant wider sustainability policy documents, mentioned above, have formed the basis of the sustainability framework. The sustainability framework incorporates a series of sustainability criteria which form the basis of this sustainability statement. The sustainability framework has been developed to consider the entire lifecycle of the Project (i.e. design, procurement, construction, commissioning, operation, and end of life, when relevant).

1.4.10 In addition to the ANPS, NPPF and local policy, GAL's Second Decade of Change to 2030 contains ten sustainability goals which have informed the core principles of the sustainability framework. The key issues covered by these goals are:

- Local economy
- Opportunity and accessibility
- Workplace safety
- Local communities
- Noise
- Airport emissions
- Aircraft and surface access emissions
- Water
- Waste
- Biodiversity

1.4.11 GAL's potential to positively impact the local economy is significant and forms a major part of the airport's sustainability agenda. Furthermore, GAL recognises the importance of conserving and enhancing the natural environment, minimising disruption to local communities, and achieving emissions reduction targets by both GAL policy and wider government and industry targets. Where possible, the Project has considered the impact across the three pillars of sustainability through mitigative action and sought opportunities where potential benefits can be achieved.

1.4.12 Important considerations need to be made to ensure that development plans are: in line with relevant policy and subsequent legislation for each core area; that they are aligned with both industry and government sustainability targets; and aligned to GAL's stated sustainability ambitions.

1.4.13 Therefore, the following high-level themes have been selected as the key points to address. These themes align with the ANPS, NPPF and GAL's sustainability goals:

- Mitigation of the impact on local air quality throughout the lifecycle of the Project.
- Mitigation of the potential various impacts on the local ecology and look towards biodiversity net gain to support GAL's ambition of being 'sector leaders' when it comes to net gain.
- Mitigation of the Project's impact on the climate throughout the lifecycle of the project in support of GAL's sustainability policy and the wider industry and governmental targets.
- Minimisation of any potential negative effects on the surrounding communities.
- Ensure the Project generates a local and regional thriving economy.
- Ensure the Project does not negatively impact the historic environment and surrounding landscape.
- Encourage resource and material efficiency, as well as sustainable waste management, throughout the Project.
- Surface access actions are to be strategically developed to assist with the sustainable transportation targets of onsite staff and the natural influx of increased passengers travelling to and from Gatwick due to its increased capacity upon completion.

1.4.14 These aspects are then drawn together in the concluding section, summarising the sustainable design and construction principles incorporated within the development.

Furthermore, Appendix A provides a summary of the mitigation measures highlighted within this Sustainability Statement, in relation to the key themes represented within Diagram 1.1.

2 Relevant Legislation, Policy and Guidance

2.1 Legislation

Climate Change Act 2008

2.1.1 The Climate Change Act 2008 set legally binding targets to reduce carbon dioxide emissions in the UK by at least 80% by 2050 from 1990 levels. The ambition of the target was increased in 2019 when the UK committed to bring all greenhouse gas emission to net zero by 2050. The Act requires the Government to set legally binding emissions targets, called carbon budgets, every five years.

2.1.2 Within the Act it is highlighted that all proposals, policies and objectives for meeting the set carbon budgets must, when taken as a whole, contribute to sustainable development.

2.2 National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

2.2.1 The 25 Year Environment Plan outlines the Government action to help the natural world regain and retain good health. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first. The plan outlines how the United Nations Sustainable Development Goals (SDGs) should be delivered in the UK and has set up a cross-Whitehall Sustainable Development Forum to co-ordinate and facilitate the implementation of SDGs in the UK. In addition to ensuring the implementation of the SDGs, the plan aims to improve existing green infrastructure by encouraging investment while also ensuring that there is a presumption in favour of sustainable development.

Airports National Policy Statement (ANPS)

2.2.2 The ANPS (Department for Transport, 2018) is in place to support the sustainable growth of the aviation industry in the UK. The ANPS recognises the significant economic and social benefits that aviation industry growth can bring while simultaneously setting out measures that ensure the adverse impacts are weighed against the positives when determining whether to grant development consent.

2.2.3 While the ANPS is primarily associated with Heathrow's third runway development, a key element of the ANPS is the confirmation of the Government's support for all other airports making best use of their existing runways (Department for Transport, 2018b). This is subject to economic, social and environmental considerations, which are relevant to the Project. These key considerations are summarised below.

Surface Access

2.2.4 The ANPS highlights that surface access should be high quality, efficient and reliable for all users. It also emphasises the desire to maximise sustainable transport, whilst avoiding congestion and environmental impacts. In fact, proposals should take:

'all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase.'

2.2.5 In addition, the ANPS states that improvements to the surface access should be able to support the increased transport associated with the increased operational capacity of the airport. To demonstrate this, an airport surface access strategy should be developed, in accordance with Aviation Policy Framework (Department for Transport, 2013). It identifies key elements that should be included:

- needs of the project;
- targets for maximising sustainable travel,
- actions and performance indicators to deliver against targets, and
- implementation and monitoring strategy.

Air quality

2.2.6 The ANPS emphasises that an air quality assessment should be undertaken to demonstrate that a proposal complies with UK air quality obligations to ensure the protection of both the environment and human health during the construction and operational phases. The development of acceptable mitigation measures should be utilised to avoid the deterioration of air quality.

Noise

2.2.7 It is recognised that noise associated with airport expansion is a significant concern for communities, as sources of noise will be from aircraft operations, ground operations, surface transport and construction. The ANPS highlights the following:

'Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:

- *Avoid significant adverse impacts on health and quality of life from noise;*
- *Mitigate and minimise adverse impacts on health and quality of life from noise; and*
- *Where possible, contribute to improvements to health and quality of life.'*

Carbon emissions

2.2.8 The ANPS states that development should not have a material impact on the ability of the UK Government to meet its carbon reduction targets, such as the carbon budgets, through the development of effective mitigation measures for construction and operation.

Biodiversity and ecological conservation

2.2.9 The ANPS promotes the conservation and enhancement of biodiversity, in line with the policies of the NPPF (see Section 2.1.54). It highlights that development should avoid significant harm to the natural environment, including through the use of mitigation measures and consideration of alternative designs. However, where significant harm is unavoidable and cannot be mitigated, compensation measures should be utilised only as a last resort.

Land use including open space, green infrastructure and green belt

2.2.10 The ANPS identifies a number of measures that should be considered to avoid unacceptable impacts on green infrastructure, Public Rights of Way (PRoW), National Trails and open access land. This includes:

- maintaining the functionality and connectivity of the green infrastructure network, mitigating any adverse impacts where necessary;
- ensuring appropriate access for PRoWs and National Trails; and
- protection of soils during construction.

Resource and waste management

2.2.11 Government policy recognises the importance of protecting the environment and human health by minimising the production of waste, or reuse of potential waste. Waste should be sustainably managed both on-site and off-site, ensuring that the principles of the waste hierarchy are followed.

Flood Risk

2.2.12 The ANPS states that the development proposal should be supported by an appropriate Flood Risk Assessment (FRA) and should not increase flood risk elsewhere.

2.2.13 It also recognises the need to consider the flood resilience of the development, taking into account '*the potential impacts of climate change using the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence*.'

Water Quality and Resources

2.2.14 A key consideration is the prevention of the deterioration in the Water Framework Directive (WFD) status of waterbodies and to avoid hindering the future achievement of 'good' status. The ANPS emphasises the need for good pollution practice during construction and operational phases to control pollution.

2.2.15 It also promotes the sustainable use of water resources, including the efficient use of water (eg water recycling).

Historic environment

2.2.16 In terms of the historic environment, the ANPS states the following in relation to the decision making of applications:

'Where the proposed development will lead to substantial harm to or the total loss of significance of a designated heritage asset, the Secretary of State will refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.'

Landscape and visual effects

2.2.17 Paragraph 5.218 of the ANPS emphasises that the design of the project should consider the impact on the landscape, ensuring the avoidance or minimisation of harm, through the use of mitigation measures, where necessary.

Dust, odour, artificial light, smoke and steam

2.2.18 This section of the ANPS highlights that airports making best use of their existing runways should include sufficient measures to minimise adverse impacts on amenity and nature conservation from dust, odour, artificial light, smoke and steam.

Community engagement

2.2.19 The ANPS highlights the need to engage with the local community throughout the planning process, as it encourages stakeholders to work together to provide feedback and identify solutions to issues.

Skills

2.2.20 The ANPS details that the '*Government is committed to helping people into jobs and improving the skills of the UK workforce, with a target of three million new apprenticeships being created in the current Parliament create jobs and new training opportunities will help to consolidate the national economic recovery, put the UK on the path to full employment and raise the nation's productivity.'*

Aviation Policy Framework

2.2.21 The Aviation Policy Framework (Department for Transport, 2013), published in 2013, set outs the government policy attributable to London and southeast England airports.

2.2.22 While it recognises the contribution the aviation sector has to the UK economy, it also recognises the capacity challenges faced by these airports, particularly Gatwick and Heathrow. The Aviation Policy Framework notes the importance of meeting the demand, delivering benefits essential to economic wellbeing, while respecting the environment, protecting quality of life, and supporting sustainable development.

2.2.23 The Aviation Policy Framework identifies key objectives to manage the environmental impact of the aviation industry as below.

- Ensure the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.
- Limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.
- Ensure appropriate health protection by focusing on meeting relevant legal obligations.

Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways

2.2.24 Published in 2018 (Department for Transport, 2018b) , this is a reaffirmation of the Government's policy on making best use of existing runways and infrastructure as part of the overall aviation strategy. All proposals for expansions or improvements are to be judged by taking careful account of economic and environmental impacts, and the proposed associated mitigations.

Flightpath to the Future

2.2.25 'Flightpath to the Future' is a strategic framework for the aviation sector that supports the Department for Transport's vision for a modern, innovative and efficient sector over the next 10 years (Department for Transport, 2022a). The framework reaffirms the Government's continued support for airport development making best use of existing runways. The strategic framework supports the Government's objective to realise the benefits of aviation for the UK.

2.2.26 One of the key objectives is supporting an innovative, environmentally sustainable sector and encouraging the use of new technology. The document highlights the Government's continued commitment to the sustainable growth of the aviation sector and supporting a greener future. This includes balancing increasing passenger demand with sustainability goals. The strategic framework highlights the key role that the aviation section will have to play in the Government net zero target by 2050, as the sector possesses a high carbon footprint.

2.2.27 It also recognises aviation's vital importance to the UK, in terms of economic contribution, jobs, and the personal value it provides to individuals throughout our regions and nations.

2.2.28 In addition, it sets out key priorities for the next ten years, including a ten point plan for delivery, and how the Government will work closely with the sector, including through the new Aviation Council, to implement the commitments established through the framework.

Jet Zero Strategy: Delivering net zero aviation by 2050

2.2.29 The Jet Zero Strategy (Department for Transport, 2022b) sets out the Government's proposed approach and principles to reach net zero aviation by 2050. The ambition is to:

- decarbonise aviation in a way that preserves the benefits of air travel; and
- maximise the opportunities that decarbonisation can bring.

2.2.30 The document explains that the Government is committing the sector to achieve Jet Zero by 2050. The strategy puts the clear 'Jet Zero' goal – net zero UK aviation emissions by 2050 – at the heart of the Government's strategy, acknowledging there are multiple pathways to see it achieved. It proposes a suite of policies to support industry to reduce and, where possible, eliminate greenhouse gas (GHG) emissions from aviation. These policies span five different measures that aim to:

- improve the efficiency of our aviation system;
- accelerate the development and deployment of sustainable aviation fuels;
- support the development of zero emission flight;

- ensure we use markets to drive down emissions in the most cost-effective way; and
- influence the behaviour of consumers.

2.2.31 The Jet Zero Strategy commits to a 'high ambition' scenario, which sets in-sector targets of:

- 35.4 $MtCO_2e$ in 2030;
- 28.4 $MtCO_2e$ in 2040; and
- 19.3 $MtCO_2e$ in 2050.

2.2.32 Many of these policies directly affect airlines, but airports are also expected to play their full part, including achieving zero emissions for airport operations by 2040.

2.2.33 The Strategy sets out a commitment that the Department for Transport '*will work with airports, other government departments, local authorities, and other interested bodies to help airports in England improve their surface access through developing Master Plans and Surface Access Strategies'*. The aim is to encourage passengers and employees to travel by sustainable modes of transport to and from the airport where possible.

Decarbonising Transport: A Better, Greener Britain

2.2.34 Decarbonising Transport: A Better, Greener Britain (Department for Transport, 2021) was published in July 2021 and sets out the Government's commitments and actions to decarbonise the transport system in the UK. Some key commitments relate to increasing walking and cycling and accelerating aviation decarbonisation.

2.2.35 The Plan includes details regarding:

- a pathway to achieving net zero transport in the UK;
- the wider benefits net zero transport can deliver; and
- the principles that underpin the government's approach to delivering net zero transport

2.2.36 The Plan follows on from Decarbonising Transport: setting the challenge, published in March 2020, which identified the scale of additional reductions needed to deliver transport's contribution to legally binding carbon budgets and delivering net zero by 2050.

National Policy Statement for National Networks

2.2.37 The NNNPS is at the time of writing subject to review, with the potential updates set to come into effect in 2023. However, the current policy statement will continue to apply to this application and sets out the need for development of road, rail and strategic rail freight interchange projects on the national networks.

2.2.38 The NNNPS identifies a vision of national road networks that will meet the long-term needs of the UK, and includes the following:

- '*Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs.*
- *Networks which support and improve journey quality, reliability and safety.*
- *Networks which support the delivery of environmental goals and the move to a low carbon economy.*

- *Networks which join up our communities and link effectively to each other.*'

Noise Policy Statement for England

2.2.39 The Noise Policy Statement for England (NPSE) (Department for Environment, Food & Rural Affairs, 2010) details the long-term vision to:

'Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.'

2.2.40 Overall, it highlights the need to avoid, mitigate and minimise adverse impacts on health and quality of life, whilst contributing to improvements where possible.

National Planning Policy Framework

2.2.41 The NPPF contains the policies which detail the Government's vision for sustainable development, which is to be interpreted and implemented locally. The three dimensions of sustainable development are as follows: an economic role, a social role and an environmental role. The NPPF intends for these to be considered collectively, rather than in isolation.

2.2.42 Relevant policies from the NPPF are outlined below.

Chapter 2: Achieving Sustainable Development

2.2.43 Paragraph 7 states that the '*purpose of the planning system is to contribute to the achievement of sustainable development*.' It goes on to discuss that the objective of sustainable development is to meet the needs of the present without compromising the ability of future generations to meet their own needs, Further, it is noted that the 17 UN Sustainable Development Goals that the UK has agreed to pursue, address social progress, economic well-being and environmental protection.

2.2.44 Paragraph 8 discusses that in order to achieve sustainable development, three overarching and independent objectives which need to be pursued in supportive ways in order to achieve gains across all three objectives. These objectives are an economic objective, social objective and environmental objective. Paragraph 9 notes that these objectives should be delivered through the preparation and implementation of plans and applications of policies within the NPPF and should not be used as criteria against which decision should be judged.

2.2.45 At the heart of the NPPF is a '*presumption in favour of sustainable development*'.

Chapter 6: Building a Strong, Competitive Economy

2.2.46 Paragraph 81 highlights that local planning authorities should encourage the investment, expansion and adaptation of businesses. It emphasises the importance of encouraging sustainable economic growth and productivity, considering local business needs and wider development opportunities, as well as, providing the supply of adequate infrastructure and services to address potential barriers to investment.

Chapter 9: Promoting Sustainable Transport

2.2.47 Chapter 9 states that development proposals should consider transport issues from the early stages of development proposals to address potential impacts on the local transport network, as well as, identifying and addressing environmental impacts of traffic and transport infrastructure. It is highlighted that any development application that will generate significant amounts of movement should be supported by a transport assessment or statement.

2.2.48 Development proposals should also identify opportunities from the existing infrastructure, ensure disabled access, and promote sustainable modes of transport (walking, cycling and public transport). The policy encourages proposals to focus on locations that offer sustainable transport options and limit the need to travel.

Chapter 12: Achieving well-designed places

2.2.49 This chapter highlights that development should achieve the '*creation of high quality, beautiful and sustainable buildings and places*.' To achieve this, development proposals should consider design quality throughout the evolution of a project and utilise engagement with the local planning authority and community to improve the design and style.

2.2.50 Chapter 12 of the NPPF highlights that planning policies should ensure that developments:

- add to the overall quality of the area over the project lifetime;
- are sympathetic to the local landscape and built environment;
- establish or maintain a strong sense of place;
- support local facilities and transport network; and
- create safe, inclusive and accessible places.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

2.2.51 Chapter 14 focuses on the UK transition to a low carbon future, and emphasises that developments should consider long-term implications for flood risk, water supply, and biodiversity. It also states that both local authorities and development proposals should support future resilience and adaptation to climate change. New development should be resilient to future impacts of climate change through the design of suitable mitigation measures and help reduce greenhouse gas (GHG) emissions through location, orientation and design. This also includes the design of the development to minimise the use of energy during both construction and operation.

2.2.52 The chapter highlights that inappropriate development in areas at high risk of flooding should be avoided and in instances where development is necessary, measures (eg sustainable drainage systems) should be taken to avoid increasing risk of flooding and avoid vulnerable development within high-risk areas. Where appropriate, applications should be supported by a site-specific flood risk assessment.

Chapter 15: Conserving and enhancing the natural environment

2.2.53 The NPPF emphasises the importance of the protection and enhancement of the natural and local environment. In addition, it promotes the '*conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species*.'

2.2.54 However, paragraph 180 states that local planning authorities should apply the following principles when determining planning applications:

'(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 63 and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

2.2.55 Paragraph 185 outlines that development proposals should consider the impacts of pollution (including land contamination, noise and light pollution) on human health and the natural environment, reducing and mitigating adverse impacts on health, quality of life, nature conservation and local amenity.

Chapter 16: Conserving and enhancing the historic environment

2.2.56 Chapter 16 ensures that the conservation and experience of the historic environment is maintained. Paragraph 200 states that adverse impacts on the setting or cultural significance of heritage assets (eg listed buildings, registered parks and gardens, scheduled monuments and world heritage sites) should be avoided.

2.2.57 However, where there may be potential harm to, or loss of, the significant of designated heritage assets, the impact would require assessment and a clear justification.

2.3 Local Policy

2.3.1 Local planning policy that relates to the sustainability statement and assessment of the Project are summarised below for each authority:

- Crawley Borough Council
- Reigate and Banstead Borough Council

- Tandridge District Council
- Mole Valley District Council

Crawley Borough Council

Crawley 2030: Crawley Borough Local Plan 2015-2030

2.3.2 Policy SD1 of the Crawley Borough Local Plan (Crawley Borough Council, 2015) sets out the 'Presumption in Favour of Sustainable Development'. This policy states that '*the council will take a positive approach to approving development which is sustainable*.' Further, development will be supported where it meets Crawley's strategic objectives:

- '*Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change;*
- *complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle and maximises the use of sustainable travel;*
- *respects the heritage of the borough;*
- *protects, enhances and creates opportunities for Crawley's unique Green Infrastructure;*
- *provides a safe and secure environment for its residents and visitors;*
- *provides for the social and economic needs of Crawley's current and future population; and*
- *accords with the policies and objectives set out in this Plan unless material considerations indicate otherwise*.'

2.3.3 In addition to this overarching policy, there are a number of more specific policies relating to sustainable development in Crawley Borough. The following policies are relevant to the Project.

2.3.4 Policy CH3: Normal Requirements of All New Development. This policy details that all development must be of high quality and must have consideration to, conserve and enhance its surrounding visual, cultural, natural and historic environment.

2.3.5 Policy EC1: Sustainable Economic Growth. This policy details how '*Crawley's role as the key economic driver for the Gatwick Diamond will be protected and enhanced*'.

2.3.6 Policy ENV6 Sustainable Design and Construction. This policy states that development must minimise energy use, utilise renewable and low carbon energy technologies, retaining existing structures where possible, minimise carbon emitted during the construction phase of a development and have regard to future climate change with the design of development.

2.3.7 Policies ENV9-ENV12. These policies relate to the efficient use of water resources and the minimisation of all forms of pollution resulting from development, including water, noise and air pollution.

2.3.8 Policy IN3: Development and Requirements for Sustainable Transport. This policy highlights that developments should minimise their impact on the traffic network and encourage the use of sustainable transport modes, including public transport and cycling and walking networks.

2.3.9 Policy GAT3: Gatwick Airport Related Parking. This policy looks to control off-airport parking. It states that '*airport parking will only be permitted within the airport boundary*'.

Draft Crawley Borough Local Plan 2021-2037

2.3.10 Crawley Borough Council is in the process of updating its local plan, with a draft local plan published in January 2021 (Crawley Borough Council, 2021). The principles are much the same, including the overarching policy SD1: Presumption in Favour of Sustainable Development, along with policies relating to sustainable economic growth, well designed development, efficient use of natural resources, minimisation of pollution and sustainable transport networks.

2.3.11 Stronger commitments to conserving and enhancing the natural environment have been made in Policy GI3: Biodiversity and Net Gain, in line with national policy.

2.3.12 Policy SDC1: Sustainable Design and Construction has stronger commitments with regard to climate change mitigation and adaptation: this policy details how developments must follow the energy hierarchy of 'be lean - be clean - be green', and how developments must be designed to in accordance with a cooling hierarchy to cope with future extreme temperatures.

Reigate and Banstead

Reigate and Banstead Local Plan: Core Strategy 2012-2027

2.3.13 The Reigate and Banstead Local Plan: Core Strategy (adopted July 2014 and reviewed in 2019) (Reigate and Banstead Borough Council, 2019a) sets out how '*the Council is committed to ensuring that development will create places and spaces that are well designed and meet the needs of today and tomorrow, but not at the expense of the future*.' Underpinning the Core Strategy is sustainable development, as detailed in Policy CS10: Sustainable Development. This policy states that development should:

- '*Make efficient use of land, giving priority to previously developed land and buildings within the built-up areas;*
- *be at an appropriate density, taking account of and respecting the character of the local area and levels of accessibility and services;*
- *protect and enhance the green fabric, and respect and contribute to the borough's green infrastructure network;*
- *respect the ecological and cultural heritage of the borough including the historic environment;*
- *minimise the need to travel, whilst increasing opportunities to walk, cycle or use public transport, including as part of the green infrastructure network;*
- *minimise the use of natural resources and contribute to a reduction in carbon emissions by re-using existing resources, maximising energy efficiency, minimising water use, and reducing the production of waste, including through sustainable construction methods. Encourage renewable energy/fuel production whilst ensuring that adverse impacts are addressed, including on landscape, wildlife, heritage assets and amenity;*
- *be designed to minimise pollution, including air, noise and light, and to safeguard water quality;*

- *be designed reflecting the need to adapt to the impacts of climate change; and*
- *be located to minimise flood risk … and manage flood risk through the use of SuDS[1] and flood resistant/resilient design features, and where necessary provide floodplain compensation*.'

2.3.14 Other policies relating to sustainable development in Reigate and Banstead Borough that are relevant to the Project are as follows.

2.3.15 Policy CS2: Valued landscapes and the natural environment. This policy states that development must 'protect and enhance the borough's green fabric'.

2.3.16 Policy CS4: Values townscapes and the historic environment. This policy states that developments should be designed to '*respect, conserve, and enhance the historic environment*' and '*respect, maintain and protect the character*' of the borough townscapes.

2.3.17 Policy CS5: Valued people and economic development. This policy sets out how the borough will have continued sustainable economic prosperity and regeneration.

2.3.18 Policy CS11: Sustainable Construction. This policy sets out construction standards for development and the promotion of renewable and low carbon energy.

Reigate and Banstead Local Plan Development Management Plan

2.3.19 This plan, adopted in September 2019 (Reigate and Banstead Borough Council, 2019b), supports and simplifies the objectives and vision established in the Core Strategy. Sustainability-related policies that are relevant to the Project are summarised below.

2.3.20 Policy DES1: Design of new development. This policy states that '*All new development will be expected to be of a high quality design that makes a positive contribution to the character and appearance of its surroundings*', including its natural, historic, visual and cultural surroundings.

2.3.21 Policy DES9: Pollution and contaminated land. This policy details how any form of air, land, water or soil pollution should be minimised.

2.3.22 Policy TAP1: Access, parking and servicing. This policy outlines requirements for sustainable transport provisions, including pedestrian and cycle routes and electric vehicle charging points.

2.3.23 Policy CCF1: Climate change mitigation. This policy details requirements on water and energy efficiency for developments. It also states requirements for renewable or low-carbon energy generation for all large developments, alongside encouraging the use of sustainable construction methods and materials.

[1] Sustainable urban Drainage Systems

2.3.24 Policy CCF2: Flood risk. This policy states that developments must consider flood risk, must not increase existing and future flood risk, incorporate sustainable drainage systems and take account of the impacts of climate change on flooding.

Tandridge District Council

Tandridge District Local Plan: Core Strategy 2008-2026

2.3.25 The Tandridge District Core Strategy (adopted October 2008) (Tandridge District Council, 2008) sets out the vision for Tandridge district until 2026, with a set of key policies. A more detailed set of policies were then produced, setting out how Tandridge will achieve sustainable development until 2029.

2.3.26 The following sustainable development-focused policies are relevant to principles of sustainable development. :

2.3.27 Policy CSP 14: Sustainable Construction. This policy details construction standards that development should adhere to. These include commitments to minimise pollution, alongside minimising operational energy demand and deployment of renewable energy where appropriate.

2.3.28 Policy CSP 15: Environmental Quality. This policy sets out how development must deliver '*a high quality, flexible, safe living environment*' and '*minimise the impact on natural resources*'. This policy includes standards on safety, security and accessibility of development alongside encouraging the provision of sustainable drainage systems, the re-use of materials within development and encouragement of innovative construction methods to minimise resource use and flood risk.

2.3.29 Policy CSP 18: Character and Design. This policy states that development must be of a high standard and complement and reflect the existing environment.

2.3.30 Policy CSP 22: The Economy. This policy sets out how Tandridge District can develop a sustainable economy.

Tandridge Local Plan Part 2: Detailed Policies 2014-2029

2.3.31 This document (Tandridge District Council, 2014) details the overarching policy for assessing development in Tandridge in policy DP1: Sustainable Development. This policy states that, when considering development proposals '*the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework*'. Other detailed policies relating to sustainability that are relevant are detailed below.

2.3.32 Policies DP19 and DP20. These policies set out how developments should be designed so that they protect, enhance or increase the natural, historic, cultural and visual environment.

2.3.33 DP21: Sustainable Water Management. This policy details how water use in developments will be minimised and encourages methods to recycle water.

2.3.34 Policy DP22: Minimising Contamination, Hazards and Pollution. This policy states that developments must minimise effects of land, noise, light and air pollution both from the development, and on the development.

Our Local Plan: 2033 (Regulation 22 Submission)

2.3.35 Tandridge District Council is in the process of updating its local plan and submitted an updated local plan to the Planning Inspectorate for examination in January 2019 (Tandridge District Council, 2019). This plan builds upon the policies included within the existing local plan, with additional emerging policies including the following.

- Policy TLP45: 'Energy Efficient and Low Carbon Development' states that development must ensure the reduction of energy consumption and take steps to include low and zero carbon technologies into the project design.
- Policy TLP50: 'Sustainable Transport and Travel' details how sustainable transport will be promoted throughout Tandridge District. This includes aims to provide infrastructure for cycling, walking, electric vehicle charging and public transport within developments.

Mole Valley

Mole Valley Local Development Framework Core Strategy 2009-2026

2.3.36 This Core Strategy (Mole Valley District Council, 2009) sets out how Mole Valle is expected to evolve up to 2026. At the heart of this strategy is the principle of sustainable development. Specific sustainability-related policies are as follows.

2.3.37 Policy CS 12: Sustainable Economic Development. This policy details how the Mole Valley District's economy will grow in a sustainable manner.

2.3.38 Policies CS 13-15: Landscape Character, Townscape, Urban Design and the Historic Environment and Biodiversity and Geological Conservation respectively. These policies detail how developments can maintain and improve the high quality environment of the Mole Valley.

2.3.39 Policy CS 18: Transport Options and Accessibility highlights the importance of accessibility and sustainable modes of transport in development proposals.

2.3.40 Policy CS 19: Sustainable Construction, Renewable Energy and Energy Conservation. This policy states requirements for new buildings that minimise energy use and maximise opportunities for recycling of resources.

2.3.41 Policy CS 20: Flood Risk Management. This plan sets out the principles of flood management, including that developments must use appropriate sustainable drainage systems.

Future Mole Valley 2020-2037: Proposed Submission Version

2.3.42 Mole Valley District Council is in the process of updating its local plan and submitted the Mole Valley Local Plan to the Planning Inspectorate in February 2022 (Mole Valley District Council, 2022). Policy S1: Sustainable Mole Valley details how development will contribute positively to the social, economic and environmental enhancement of Mole Valley. Other more detailed policies that differ from existing policy are detailed below.

2.3.43 Policy S2: Combatting the climate emergency. This policy sets out requirements for developments to mitigate and adapt to climate change.

3 Strong Economy

3.1 Short and Long-term Employment Benefits

3.1.1 In the short term, the construction activities are anticipated to generate employment opportunities for skilled local construction workers with construction employment, for the Project, peaking at approximately 1,350 workers in February 2027 (see **ES Chapter 17: Socio-Economics** (Doc Ref. 5.1)).

3.1.2 Along with this, initiatives to provide training opportunities for the construction workforce would be introduced during the construction phase of the Project. This would be implemented through the Employment, Skills and Business Strategy (ESBS) (**ES Appendix 17.8.1: Employment, Skills and Business Strategy** (Doc Ref. 5.3)), which has been developed in order to demonstrate GAL's commitment to benefiting the local economy and communities through the Project. This aligns with key national policy, such as the ANPS, NNNPS, and Flightpath to the Future, which emphasise the need to maximise employment and skills opportunities.

3.1.3 The ESBS is set up for GAL to collaborate and coordinate with relevant stakeholders to generate educational opportunities, looking to generate interest in STEM careers with Gatwick to develop an on-site STEM centre. GAL will look to develop local employment opportunities through construction and non-construction related job opportunities, which could help diversify the employment base as targeted within the Mole Valley Local Plan. It will also facilitate procurement from small and medium-sized enterprises (SME's) from the local study area and labour market, and the creation of clear pathways to GAL and Gatwick family employment, skills development and other employment and skills related opportunities. These employment pathways are to be in place well before the commencement of recruitment to maximise the opportunities for residents, allowing the achievement of national policy targets to drive employment. A 'local procurement champion' will also be created as a resource to reach out to local business communities, and help GAL understand the local market in search for GAL preferred suppliers.

3.1.4 GAL will use the ESBS to support innovation in the region, attempting to maximise the Project's potential for driving up entrepreneurship, business productivity and the development of cutting-edge technology. Example plans of how this will be facilitated include actively connecting with small businesses to engage them with GAL's innovation pipeline, curriculum enrichment opportunities for STEM students, and the development of a regional inward investment service. This aligns with key national policy, such as the NPPF, ANPS and NNNPS, which encourage the promotion of employment and skills opportunities. It would also support the Crawley Borough Local Plan (2015), which has objectives around diversification of the employment base.

3.1.5 The Project is expected to lead to the generation of operational employment, with forecasting suggesting that approximately 3,220 additional direct jobs would be generated by 2038 (see **ES Chapter 17: Socio-Economic** (Doc Ref. 5.1)). Both the construction and operational workforce will also increase demand for community facilities and services. For example, staff and visitors would be able to use services within close proximity to the airport, having positive benefits for these local services and amenities. These will include local businesses such as restaurants/takeaways, shops, and cafes. Thus, the Project

would be able to provide indirect benefits for local businesses, which can help drive further investment and attract additional businesses to the local area. This is a key element of both national and local policy, which look to encourage and drive economic growth..

3.2 Growth of Economy

3.2.1 The Project, which aims to make best use of Gatwick's existing runways and infrastructure, would facilitate greater national and international connectivity as it would allow for increased capacity and flights. As a result, this would contribute towards economic growth through increasing access to international markets where trade and investment can be delivered in support of the ANPS (Department of Transport, 2018a). This aligns with key principles of the NPPF, which include encouraging sustainable economic growth and delivering a strong, competitive economy.

3.2.2 This can drive further economic benefits as it would attract businesses to cluster around Gatwick, in order to utilise the greater 'air connectivity' benefits, such as access to freight services to transport goods. The ANPS and Flightpath to the Future recognise the importance of air freight in supporting the UK trade ambitions. As a result, Gatwick allows for increased connectivity, and the Project would enable increased opportunities for transport of freight for businesses. This is important for driving economic growth as highlighted within national strategies and policy.

3.2.3 In addition, the Project would support tourism as it facilitates the movement of people which can further drive economic activity as capital is spent of amenities and services.

3.2.4 An increased operating capacity of Gatwick would also create an increased competition between airlines, which may provide benefits in terms of air travel fares. This is because, without an increased capacity, higher costs may be imposed due to demand increases, thus impacting on the wider economy (Department for Transport, 2018a).

3.2.5 The socio-economic assessment (see **ES Chapter 17: Socio-Economic** (Doc Ref. 5.1)) highlights that the majority of the reconfigurations and alterations arising from the Project would not have material impacts on existing businesses within the Project site boundary. The Project also includes a detailed programme and sequence of works that has been designed to offset any relocation or displacement issues for businesses. As a result, the Project would not lead to unacceptable impacts on local business, which supports the Coast to Capital Strategic Economic Plan 2018-2030 (Coast to Capital, 2018), which identifies key economic priorities that require addressing.

3.2.6 In summary, the Project would encourage employment and skills opportunities through the generation of employment opportunities during construction and operation, as well as through the implementation of the ESBS. This aligns with the ANPS and NPPF, which expects applicants to maximise the employment and skills opportunities for local residents, including apprenticeships. The Project would also support Point 7 of the government's 'Flightpath to the Future' as it would support and enhance skills and workers in the sector, which is essential for encouraging the next generation of aviation workers.

3.2.7 The Project would also contribute to a strong and resilient economy, thus aligning with key local and national policy, such as the NPPF, ANPS and NNNPS. These policies recognise the importance of aviation in driving sustainable economic growth due to enhanced

national and international connectivity, tourism activity, and employment. The Project also aligns with Local Planning Authorities, such as Crawley Borough Council, Mole Valley District Council, Reigate & Banstead, and Tandridge who look to encourage and support economic growth.

4 Strong, Healthy and Safe Communities

4.1 Promoting Healthy Communities

4.1.1 This section covers developing healthy communities through effective design. These aspects focus on issues including the provision of appropriate lighting, air quality, ground contamination, adequate noise levels and design layout to enable a high standard of living for local communities.

Lighting

4.1.2 An Operational Lighting Framework has been developed, which provides an overarching creative and technical framework for exterior lighting associated with the operation of the Project (**ES Appendix 5.2.2: Operational Lighting Framework** (Doc Ref. 5.3)). The framework considers sustainable development, as well as the Guidance Notes for the Reduction of Obtrusive Light to minimise potential adverse impacts on local residents and users of the space (Institute of Lighting Professionals, 2021). The framework considers types of lighting equipment, mounting location, materiality, durability and light source to minimise disruption to safety and security.

4.1.3 Lighting of the construction sites will be required to ensure that construction work is able to continue safely and effectively during the night-time works and other periods of insufficient natural light. Mitigation measures associated with construction lighting would be secured through the Code of Construction Practice (CoCP) (**ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)), which includes the following:

- Measures will be adopted to enhance the public sense of safety and security within and around the construction sites. For example, measures will be adopted to avoid shadows cast from the site on surrounding footpaths, walkways, roads and amenity areas.
- Task-based lighting will be provided for specific high-risk tasks.
- Lighting will be designed, positioned and directed to account for aesthetic and environmental conditions (where possible).
- Lighting will seek to avoid intrusion on adjacent buildings, sensitive receptors, ecological receptors and structures used by protected species, and additional land uses to prevent unnecessary disturbance.
- Lighting for construction compounds and workforce areas will incorporate restricted upwards light spillage and energy efficient fittings. Checks will be carried out on a regular basis to ensure that lighting has not been repositioned.

Air Quality

4.1.4 An air quality assessment has been carried out for all stages of the Project, as part of the **Draft Development Consent Order** (Doc Ref. 2.1). During construction, the Project would

require activities associated with demolition, construction and earthworks with associated trackout. As a result, air quality impacts are likely to be a result of dust generation, plant and construction vehicle emissions.

4.1.5 As highlighted within the NPPF, ANPS and other national policy, it is essential for development proposals to design and mitigation measures to avoid impacts from air pollution. Therefore, the construction dust assessment has informed appropriate control measures for high-risk activities to be deployed during all construction works to minimise dust soiling or human health effects. The measures would be implemented through a CoCP (**ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)) and would include water spraying, covering of dusty materials, and a wheel washing system for vehicles.

4.1.6 The Project includes a commitment to include suitable construction dust monitoring, which would be implemented through the CoCP. Monitoring would be carried out following best practice guidance as defined by the IAQM (Moorcroft et al., 2017).

4.1.7 As seen in the Second Decade of Change to 2030, GAL is committed to all mobile construction equipment being zero or ultra-low emission by 2030. Low emission plant would be used during construction of the Project.

4.1.8 In addition, a Construction Traffic Management Plan (CTMP) (**ES Appendix 5.3.2: CoCP – Annex** 3 (Doc Ref. 5.3)) has been developed to reduce construction traffic, minimise potential impacts on the highway network, and minimise traffic using local minor routes, where feasible. In accordance with the AQMA around Hazelwick Roundabout, construction traffic will be directed through the M23 Junction 9 in order to avoid any routing through the AQMA. The CTMP would minimise construction traffic on local minor routes except where necessary for local supply chain vehicles. It would also promote sustainable transport modes for construction to lower emissions and congestion.

4.1.9 During operation, there would be additional aircraft movements and associated activities on the airport, as well as increases in road traffic. In order to reduce associated emissions and protect human health, air quality will be addressed through the Surface Access Commitments (**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)). The SAC includes commitments to achieve specific passenger and staff sustainable travel share modes.

4.1.10 Furthermore, a Carbon Action Plan (CAP) (**ES Appendix 5.4.2: Carbon Action Plan** (Doc Ref. 5.3)) has been developed. The CAP commits to key outcomes and includes a number of measures that could be implemented to reduce emissions to achieve these outcomes. The actions to reduce emissions are associated with construction, aviation and airport buildings and ground operations. Example opportunities include:

- encouraging low or zero carbon construction vehicles;
- reducing landing charges for Sustainable Aviation Fuels aircraft;
- investing in zero emission airport buses;
- delivering a plan for recharging infrastructure for zero emission vehicle (ZEV) airside fleet;
- reviewing all ground operation vehicles and equipment for potential ZEV adoption;

- Purchase ZEVs when GAL-owned vehicles are due to be replaced (where suitable vehicles exist).

4.1.11 When considering the above management plans and strategies relevant for both the construction and operational phases of the Project the design and management is in line with the NPPF and ANPS requirements and the Project would not lead to an unacceptable risk on human health from air pollution.

4.1.12 GAL commits to continuing monitoring of air quality at three permanent sites to be run jointly with the local authorities, as well as the site at the eastern end of the Main Runway run by GAL. Furthermore, new monitoring locations within and external to the airport site have been proposed, which would allow for monitoring of the air quality reduction measures proposed as part of the Project.

4.1.13 Air quality assessments identified that there is potential for local communities to experience occasional, short-term odour under specific weather conditions as a result of the increase in airport activity. However, best practice measures to mitigate odours from the airport would be implemented through an air quality action plan.

Ground Contamination

4.1.14 The NPPF outlines that planning policies should contribute to the conservation and enhancement of the natural and local environment by preventing development from contributing to, or being adversely impacted, by unacceptable levels of pollution. It also states that measures should be developed to remediate and mitigate contaminated land. Therefore, proposals should assess whether a site is suitable for the proposed use, taking into consideration the ground conditions and contamination risk.

4.1.15 This is reinforced by the NNNPS, which states that where development is considered on previously developed land, applicants should assess the risk posed by land contamination and develop measures to address any potential impacts.

4.1.16 A Preliminary Risk Assessment has been carried out across the Project site to understand potential sources of contamination (see **ES Appendix 10.9.1: Preliminary Risk Assessment** (Doc Ref. 5.3)). The assessment identified sources of contamination that represent potential areas of concern, with some potential pollutant leakages highlighted. Without appropriate measures, this would provide a potential risk to human health. Therefore, recommendations have been provided for each area, which include further ground investigation and a discovery strategy.

4.1.17 Ground investigation would inform whether a remediation strategy is required to ensure that the site is suitable for the proposed use. Where required, the strategy would comprise the following:

- implementation plan setting out the objectives and requirements of the remediation;
- validation sampling to confirm that remediation objectives have been met; and
- verification report.

4.1.18 The scope of the remediation strategy would be agreed with the Environment Agency/relevant local planning authority prior to its implementation. Subject to the scope

and results of the Remediation Strategy, the following would be undertaken where appropriate to inform construction activities and the detailed design of buildings:

- piling risk assessment (in accordance with the Environment Agency guidance) including control measures (where appropriate) to mitigate risk to controlled waters during piling installation;
- detailed ground gas risk assessment and gas control measures during construction and to be incorporated into building design (where appropriate); and
- groundwater and/or surface water monitoring.

4.1.19 The remediation strategy would be supported by a Materials Management Plan to document the management of soils on the site (including the raising of Pentagon field) and include a risk assessment procedure to demonstrate the soils do not present a risk to human health or the environment. The Materials Management Plan will be undertaken in accordance with the CL:AIRE Code of Practice (CL:AIRE, 2011).

4.1.20 Where further ground investigation is not recommended at this stage, a discovery strategy would be implemented, which would include suitably trained personnel to undertake the watching brief. If any unidentified contamination is detected, a consultant within the Project team responsible for land contamination would be contacted. Any construction activities in the area of this material would cease until an appropriate plan for dealing with the contamination has been put in place.

4.1.21 Construction workers would be required to wear appropriate personal protective equipment and maintain good levels of hygiene based on risk assessments in accordance with Construction (Design and Management) Regulations 2015. This would ensure the health of workers are maintained.

4.1.22 An unexploded ordnance (UXO) mitigation strategy would be developed using guidance within Unexploded Ordnance: A guide for the Construction Industry (CIRIA, 2009). The strategy would utilise information from the Explosive Ordnance Threat Assessment Report (Bactec, 2013) to develop mitigation measures to reduce risks from unidentified unexploded ordnance.

4.1.23 Overall, the above demonstrates that, in line with the key principles of the NPPF and ANPS, the Project would not lead to an unacceptable risk on human health from ground contamination.

Noise

4.1.24 The Department for Transport has specific objectives and restrictions in regard to night flights and the associated noise pollution. For example, paragraph 5.67 of the ANPS states that:

'The proposed development must be undertaken in accordance with statutory obligations for noise. Due regard must have been given to national policy on aviation noise, and the relevant sections of the Noise Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF) and the Government's associated planning guidance on noise.'

4.1.25 In addition, the Aviation Policy Framework has outlined several policy expectations related to noise. Noise management is to be undertaken through a balanced approach, with reduction of noise at source through quieter aircraft, land use planning and management, noise abatement operational procedures, and operating restrictions. The Government expects all airports to ensure that they make efforts to mitigate noise where changes are planned, particularly relevant to proposals for new airport capacity, operational changes or increase in movements changes.

Construction Noise and Vibration

4.1.26 A Noise Impact Assessment has been carried out, which states that there would be work on the airfield required to be undertaken at night (see **ES Chapter 14: Noise and Vibration** (Doc Ref. 5.1)) This has potential to impact communities around the perimeter of the airport, including Charlwood village, Lowfield Heath and the south side of Horley where there are works to highway structures. It also identified relatively small areas where there could be significant impacts during daytime construction. There would be temporary impacts associated with vibration during the construction phase.

4.1.27 The Project includes a number of mitigation measures to reduce noise pollution. Construction would be undertaken in accordance with a CoCP (**ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)), which sets out the key management measures that contractors would be required to adopt and implement. This would ensure that the quality of life and well-being of local residents will not be adversely impacted, aligning with key policy such as the NPPF and ANPS.

4.1.28 Firstly, any works would follow Best Practicable Means (BPM) outlined in Section 72 of the Control of Pollution Act 1974 (As amended) to minimise any noise impacts (including vibration) at neighbouring residential properties and other sensitive receptors. As part of BPM, mitigation measures would include quieter methods of working, reducing plant noise levels for night works near sensitive areas, and use of noise barriers and screening. Monitoring would be implemented by contractors to assure and demonstrate compliance with all noise and vibration commitments. Monitoring data would be provided regularly to, and be reviewed by GAL, and made available to the local authorities.

4.1.29 Following the implementation of BPM, if the noise exposure exceeds the criteria defined in the CoCP (see paragraph 6.8.2 of the **ES Appendix 5.3.2 Code of Construction Practice** (Doc Ref. 5.3)) noise insulation or ultimately temporary re-housing would be offered at qualifying properties. This would avoid residents being adversely impacted by levels of construction noise inside their dwellings, thus conserving well-being and quality of life for surrounding residential areas.

4.1.30 In terms of construction traffic, an assessment was undertaken in accordance with the Design Manual for Roads and Bridges methodology (National Highways *et al*., 2020). However, a Construction Traffic Management Plan would be developed to reduce construction traffic, minimise potential impacts on the highway network, and minimise traffic using local minor routes, where feasible (**ES Appendix 5.3.2: CoCP – Annex 3** (Doc Ref. 5.3) This would ensure that construction traffic does not lead to unacceptable impacts on the local community.

Operational Noise & Vibration

4.1.31 In terms of operational noise, the key sources would result from increases in aircraft noise, ground noise and road traffic.

4.1.32 Air noise impacts are quite modest as the Project does not change the routing of the aircraft significantly. The main noise impacts would be due to increased number of flights rather than new impacts over areas that were previously unaffected.

4.1.33 The Project adopts an International Civil Aviation Organization (ICAO) balanced approach (ICAO, 2008) for aircraft noise management, consisting of managing noise at source, land use planning and management, and noise abatement operating procedures and restrictions. This is detailed in the existing Noise Action Plan (Gatwick Airport Limited, 2019), which is updated by GAL and reviewed by DfT every five years. Some measures include the following:

- In order to minimise noise at the source, operational measures include higher landing costs for noisier aircraft which is intended to incentivise airlines to operate quieter aircraft.
- GAL works with local authorities and provides noise exposure information that can be used to avoid new housing built in unsuitable locations or without suitable mitigation (eg insulation) in place.
- Procedures for flights from the northern runway would be designed to minimise noise impacts, including set departure noise limits, which result in fines for airlines if exceeded. This is intended to incentivise good operational procedures on departure.

4.1.34 Furthermore, a noise insulation scheme would be introduced as a mitigative effort for housing and schools that fall within the noise contour boundaries. A home relocation assistance scheme for home owners within the Leq 16hr 66dB noise contour would also be provided.

4.1.35 The above noise envelope is proposed, to align with the ANPS, to set limits on noise from future operations at the airport in terms of the areas of Leq, 16 hour day and Leq, 8 hour night noise contour areas. This has been developed through stakeholder consultation. The area of the Leq day and night contours would not exceed these limits, and the noise envelope would provide certainty to the community that noise levels would be limited and would reduce in the future so as to share the benefits of new technologies with the community.

4.1.36 In terms of ground noise, the increased numbers of aircraft and additional taxiways closer to neighbouring properties (in the north) has potential to increase noise pollution. The Project would incorporate mitigation measures, such as:

- bunding 8 metres in height situated at the western end of northern runway;
- museum field bund, which would provide additional ground noise screening;
- acoustic design of plant and fixed noise sources on buildings to avoid noise from fixed sources creating noise impacts at receptors outside the airfield; and
- noise barriers 10 metres high adjoining the bund installed at the western end of the northern runway, which runs approximately 500 metres just to the north of the relocated Juliet Taxiway.

4.1.37 As previously mentioned within paragraph 4.2.30, the Project includes a noise insulation scheme for those houses around the airport perimeter that may be adversely impacted by noise. Therefore, this would ensure that negative impacts associated with ground noise are avoided through appropriate mitigation measures.

4.1.38 Lastly, noise mitigation including noise barriers, traffic management and speed reductions have been incorporated into the highway design to minimise noise pollution associated with increases in road traffic.

Summary

4.1.39 The above demonstrates that the design of the Project would avoid detrimental impacts on air quality and human health, which supports relevant national policy. This includes the NPPF as it would help support the key principle to '*support strong, vibrant and healthy communities'*. It would also align with the ANPS, which promotes the protection and enhancement of environmental quality through the regulation of pollution (eg noise, air quality and odour), which is essential for the health and well-being of communities.

4.1.40 Where there are impacts on existing residential properties (ie due to noise), the Project includes appropriate design and mitigation measures. This is a key principle detailed within the ANPS.

4.1.41 The Project aligns with a number of local policies and objectives, which focus on minimising pollution and promoting healthy and safe communities. Crawley Borough Council policies ENV10-ENV12 cover the protection of the environment and community from unacceptable land contamination, noise and air quality impacts.

4.2 Accessibility to Local Services

4.2.1 The Project site is accessed from the national strategic road network via the M23 motorway, which runs north-south adjacent to the Airport. Gatwick is served by frequent bus and coach services at the North and South Terminals, which provide good access to local areas of Crawley, Horley, Horsham and Redhill.

4.2.2 Staff and visitors are able to use services within the airport and in nearby locations, having benefits for existing local services and amenities and such local businesses, including restaurants/takeaways (eg McDonalds), shops (eg Tesco Extra, Sainsbury's, etc.), cafes, and the County Mall Shopping Centre in Crawley.

4.2.3 In line with the principles of the ANPS and NPPF, the Project includes improvements to increase sustainable transport routes that provide access to the local area. The National Cycle Route 21 (NCR21) provides a continuous route between Crawley, Gatwick, Horley, Reigate and London, and the Project includes a new pedestrian and cycle route between the Longbridge Roundabout and North Terminal by Staff Car Park Y, signalised crossings, and a cycle bridge over the River Mole. As a result, there would be safer access for cyclists and pedestrians to the Project site.

4.2.4 The above supports the NPPF as it can help support '*strong, vibrant and healthy communities'* through safe access to local facilities and amenities. It also supports

principles of the ANPS as it can bring benefits to health and well-being by allowing safe, active travelling such as walking and cycling.

5 Sustainable Transport

5.1 Surface Access

5.1.1 Access to the Project site is from the national strategic road network via the M23 motorway, which runs north-south adjacent to the Airport.

5.1.2 There are currently approximately 46,700 car parking spaces provided on the airport site, with additional 21,200 authorised parking spaces off-site. An Airport Surface Access Strategy (ASAS) has been developed for Gatwick in accordance with the Aviation Policy Framework guidance, which details the provision of limited additional parking spaces as part of the parking strategy. The Surface Access Commitments builds on the ASAS and commits GAL to encouraging sustainable modes of transport (eg public transport, cycling, etc) (**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)). In addition to the surface access improvements included as part of the Project design, this aligns with the ANPS as it allows the development to support the increased transport associated with the increased operational capacity of the airport through the encouragement of other modes of transport.

5.1.3 GAL aims to provide access for all and currently has step-free level access to all platforms in Gatwick Airport railway station, with five new lifts and eight escalators planned to be added as part of the separate Gatwick Airport station project, which is a Network Rail upgrade scheme. The airport also provides dedicated drop-off points for Blue Badge holders or passengers that require assistance. This will contribute to the Government's strategy to improve disabled access, which is detailed within the NNNPS.

5.1.4 For the construction phase, transport disruption shall be minimised, as GAL has set requirements for all contractors to manage construction traffic impacts on the local community. Route wide, local area and site-specific traffic management measures will be implemented during the construction of the Project on or adjacent to roads, footpaths, and other public rights of way. This includes temporary diversion routes for traffic and pedestrians during construction to ensure that safety is maintained for users. This will contribute to the objectives of the NNNPS which aims to build '*networks which support and improve journey quality, reliability and safety*.'

5.1.5 A Construction Traffic Management Plan (CTMP) would be implemented as part of the construction works to minimise adverse impacts, in accordance with Transport for London guidance (**ES Appendix 5.3.2: Code of Construction Practice – Annex 3** (Doc Ref. 5.3)). Measures would include the following:

- construction material and logistics traffic movements via road would be scheduled outside of peak times;
- ensure the transport of construction materials and waste is managed as sustainably as possible;

- Delivery Management System (DMS) to manage material deliveries to site and collections by scheduling and re-timing them in a manner that consciously avoids the most congested times of the day.
- encourage and incentivise the use of public transport for the construction workforce; and
- shift patterns would be timed to avoid travel during peak times.

5.1.6 Therefore, the Project includes a number of measures to avoid potential impacts on the local transport network, which aligns with Chapter 9, 'Promoting Sustainable Transport', of the NPPF. This concurrently addresses a key point within the ANPS, regarding surface access, which states that proposals should consider '*all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase'*.

5.1.7 During operation, given the existing high traffic flows on the highway network, the Project is not expected to generate substantial traffic flows beyond the network in the immediate vicinity of the Airport. Additionally, the Project includes a number of improvements to the transport infrastructure, which will support increasing capacity and bring benefits for the local road network. This includes the surface access improvements to the highway, including improvement works to the North and South Terminal Roundabouts. These highway works would also incorporate improvements to walking and cycling infrastructure. Therefore, there would not be any adverse impacts associated with increased operational traffic.

5.2 Sustainable Transport Options

5.2.1 Gatwick Airport station is situated within the Project site and provides regular, direct daily services from over 120 stations. Thus, there is a high rail connectivity at Gatwick with links to London, Brighton, Cambridge, Peterborough, Reading, and the wider UK.

5.2.2 Gatwick is also served by frequent bus and coach services at the North and South Terminals. On average, Gatwick experiences approximately 450 daily arrivals and 500 daily departures to destinations across the UK.

5.2.3 The site is well served by local bus services, provided by Metrobus, which are used by airport staff, airport passengers, and rail passengers using Gatwick Airport railway station. All buses are low floor, wheelchair accessible vehicles. The bus services provide access to the local areas of Crawley and Horley, which are located approximately 3.5 km and 1 km (distance from town centre) from the Project site, respectively. Bus services also provide good access to further settlements, including Horsham and Redhill, which has led to high proportions of staff using public transport.

5.2.4 Furthermore, GAL has identified a number of areas, including Surrey, Kent and Sussex, where improvements to public transport service coverage would increase the proportion of staff and passengers utilising public transport in support of their sustainability goals. To achieve this, GAL would fund the operation and increase subsidies to the operator to enhance the service frequency, hours of operation and reach of local bus services. This would improve accessibility, via sustainable modes of transport, between the airport and nearby communities.

5.2.5 The airport is accessible by pedestrians and cyclists from Crawley and Horley. The National Cycle Route 21 also provides a connection for cyclists from Gatwick to Reigate and London. There are also a number of regional cycle routes, that provide access to Gatwick. There are designated off-road walking routes towards Crawley and Horley which minimise conflicts with vehicles and thus, ensure safety for users. Footways and zebra crossings have been provided where appropriate, with signage to direct passengers to terminals. GAL has also introduced walking routes and maps on-site, which includes a designated route between North Terminal and South Terminal. Therefore, this allows safe pedestrian access to and within the Project site.

5.2.6 As part of the Project, Gatwick has proposed improvements to increase sustainable transport options for active travel (ie walking and cycling). This includes a new pedestrian and cycle route between the Longbridge Roundabout and North Terminal by Staff Car Park Y, signalised crossings, and a cycle bridge over the River Mole. The Project also includes further improvements to existing pedestrian and cycle routes.

5.2.7 In summary, Gatwick provides a range of sustainable transport options, which could provide opportunities for walking and cycling, as well as the use of public transport. This supports key principles of the ANPS and NPPF which looks to maximise sustainable transport, as well as the objectives of the Jet Zero Strategy and Decarbonising Transport. These include commitments to increase cycling and walking, limiting the need to travel unsustainably.

5.3 Encouraging the Use of Sustainable Transport Options

5.3.1 The primary aims of a Travel Plan are to influence the travel behaviour of employees and to minimise the number of vehicular trips generated by the development. It is considered that employees travel behaviour can be influenced through the implementation of travel planning measures which actively encourage sustainable travel modes.

5.3.2 During construction, a Construction Workforce Travel Plan will be implemented, which includes measures encouraging more sustainable travel patterns (**ES Appendix 5.3.2: CoCP – Annex 2** (Doc Ref. 5.3)). These measures include:

- staggered shift start and end times to avoid pressure on the highway network during peak times;
- the organising of shuttle bus services from designated pick-up points; and
- provision of bus services to park and ride sites and to specific towns and cities where construction workers come from.

5.3.3 These construction workforce measures will ensure the reduction of unsustainable modes of travel, whilst encouraging sustainable modes such as public transport. This aligns with the NPPF policy to promote sustainable transport.

5.3.4 As mentioned previously, the Surface Access Commitments would ensure that sustainable travel modes are encouraged during operation (**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)). Additionally, Gatwick Airport provides additional benefits for employees to encourage more sustainable travel. This includes discounted bus travel using the Gatwick Travelcard key card on Metrobus. This will help contribute towards government targets to decarbonise the transport system in the UK and increase cycling

and walking, as stated within Decarbonising Transport: A Better, Greener Britain (Department for Transport, 2021).

5.3.5 All buses within the local area include GPS technology so live arrival times can be displayed on digital information screens at bus stops and stations. This allows more convenient travel for passengers, which will encourage the use of these travel modes.

5.3.6 Key commitments included within the Surface Access Commitments include:

- a minimum of 55% of air passenger journeys to and from the Airport to be made by public transport;
- a minimum of 55% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes;
- a reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 12% of surface access journeys; and
- at least 15% of airport staff journeys originating within 8km of the Airport to be made by active modes.

5.3.7 These detailed actions support the targets and commitments of national policy that relates to the maximisation and encouragement of sustainable travel, such as the ANPS and NPPF.

6 Effective & Well Designed Places

6.1 Creating a High-Quality Built Environment

6.1.1 The principle of the Project is to increase the airfield capacity of Gatwick through alterations to the existing northern runway and enhancements to the taxiway system and parking stands to accommodate an increase in aircraft movements. The Project builds on key principles of the NPPF, such as prioritising development of previously developed land. Rather than the development of a new runway on greenfield, the Project looks to re-develop existing built up land, thus, promoting the effective use of land and safeguarding green belt. This also conforms with key principles within Policy CS10 of the Reigate and Banstead Local Plan: Core Strategy 2012-27.

6.1.2 The **Design and Access Statement (DAS)** (Doc Ref. 7.3) sets out the design and access principles that have informed the development of the Project. It also details the site-wide design guidelines that will ensure that the highest design standards are adhered to during the detailed design stages.

6.1.3 The design includes improvements to the highway network to facilitate greater capacity, which would likely result from the changes to the northern runway. This would ensure that the Project supports the efficient function of the local transport network, thus aligning with the NPPF. The improvements have been subject to detailed engagement and consultation with highway authorities, including National Highways. This allowed refinements to be made to ensure high quality design, which is emphasised within national (NPPF) and local policy, such as the Crawley Borough local plan and Reigate and Banstead Local Plan Development Management Plan.

6.1.4 The main components of the Project would reflect the existing airport environment, as many of the components include relocated airfield elements. In addition, the proposed airport terminal extensions will be in-keeping with the design of the existing buildings and interior designs will provide a modern appearance with the installation of new facilities. Therefore, this would help with the integration of these structures into the surrounding landscape and would not cause unacceptable impacts on the composition or quality of the existing built landscape, thus aligning with Chapter 10 of the NPPF.

6.1.5 However, the design includes the demolition of ageing facilities for replacement with modern buildings. This would lead to an improvement in terms of visual appearance and should overall quality of the area over the project lifetime, thus supporting the NPPF. By applying circular economy principles, waste would be minimised through the deconstruction and removal of components, products and materials which are suitable for reuse/recycling/recovery prior to demolition.

6.1.6 Furthermore, the new buildings that are included within the Project would be designed and constructed for Net Zero emissions during the operational stage. One of the many measures to be considered in the CAP details that the design of new infrastructure could include cutting-edge approaches to energy efficiency. This would align with Chapter 12 of the NPPF as it ensures the creation of a high quality and sustainable built environment.

6.1.7 In line with the ANPS, proportionate protective security measures are included within the existing Gatwick security arrangements, which will not be compromised by the Project. The airport is secured through security perimeter fencing, CCTV, and security gates manned by GAL Security staff. The Project would also include the expansion of security gates and additional security lanes within terminals to manage the increased capacity and ensure security, as well as security systems (including CCTV, barrier gates, etc.) within the additional car parks.

6.1.8 As previously mentioned, Gatwick currently provides step-free level access to all platforms in Gatwick Airport station, with five new lifts and eight escalators planned to be added. The airport also provides dedicated drop-off points for Blue Badge holders or passengers that require assistance. Disabled parking is also provided. Therefore, the Project would provide a safe, inclusive and accessible place, thus aligning with Chapter 12 of the NPPF.

6.1.9 An outline Landscape and Ecology Management Plan (LEMP) (**ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3)) has been developed for the Project, which will ensure that green infrastructure assets are retained wherever possible. This would also minimise adverse impacts on the character of surrounding landscapes and townscapes and prevent coalescence of the airport and settlements of Crawley and Horley. Furthermore, the Project includes proposed earth shaping, embankments and cuttings or bunds to provide visual screens and opportunities for the creation of diverse habitats. This would help maintain a strong sense of place, whilst maintaining the functionality and connectivity of the green infrastructure network. This shows that the Project aligns with relevant national policy, such as the ANPS and NPPF, which promote the effective use of the land and conservation of the green infrastructure network.

6.1.10 The Project also includes proposed woodland, tree, scrub, shrub, wetland, amenity and grassland planting to ensure a high quality environment is created within the airport and

surrounding landscape/townscape and enhance screening capacity of significant vegetation.

6.2 Effective Management of Soils

6.2.1 During construction, controls will be implemented to ensure that any potential avoidable impacts on soils, farms, and farm-based businesses are mitigated. Agricultural land adjacent to the construction site will be protected. Where appropriate, these would include the maintenance of farm access locations; provision of appropriate fencing; maintenance of water supplies; co-ordination of timing of construction works to facilitate farming operations; and measures to address the potential risks of the spread of animal and plant diseases. An Soil Management Strategy (**ES Appendix 5.3.2: CoCP – Annex 4** (Doc Ref. 5.3)) has been developed, which outlines best practice techniques to maintain the quality of agricultural land temporarily affected by disturbance during the construction period. Thus, aligning with the ANPS which highlights the importance of protecting soils during construction.

6.2.2 Excavated material is to be managed in line with the waste hierarchy with preference given to reuse where feasible and the design allows. In line with Directive 2008/98/EC on Waste, clean naturally occurring soils will be reused on-site. Contractors are to implement all required environmental permits, exemptions, and a Materials Management Plan (see **ES Appendix 5.3.2: Code of Construction Practice – Annex 5** (Doc Ref. 5.3)) for the reuse of made ground and contaminated soils (in accordance with the Definition of Waste: Development Industry Code of Practice). Materials that are not suitable for reuse or are excess to requirements are likely to be managed as waste.

6.2.3 The Project would result in the permanent loss of agricultural land, which would be associated with the creation of a flood compensation area and land required for highway improvements. Despite this, a detailed Agricultural Land Classification (ALC) survey has shown that these areas comprise entirely lower quality Subgrade 3b land. Therefore, the Project would not result in the loss of best and most versatile quality agricultural land.

6.2.4 In summary, the Project will not result in irreversible impacts to quality agricultural land and would ensure the protection of soils during the construction phase, where land is used temporarily. This conforms with the ANPS that highlights the need to protect soils, and Chapter 12 of the NPPF that emphasises the effective use of land. It also supports local policies that aim to make effective use of land whilst minimising impacts to the surrounding environment and landscape.

6.3 Community Engagement

6.3.1 During the progression of the Project, there have been two rounds of consultation in Autumn 2021 and Summer 2022. The initial consultation in Autumn 2021 ran for a period of 12 weeks and presented the Project proposals, outlined the need for and benefits of the Project and included the Preliminary Environmental Information Report (PEIR). The second consultation in Summer 2022 ran for a period of six weeks to update stakeholders and the local community on the ongoing work and refinement of the Project proposals subsequent to the Autumn 2021 consultation.

6.3.2 Relevant statutory and non-statutory consultees have been consulted throughout the EIA process, through a variety of means, including through regular Topic Working Groups.

6.3.3 The Applicant has used various methods to engage with local communities and promote awareness throughout the development of the Project, which includes the following:

- Regular Project updates were presented to the Gatwick Airport Consultative Committee, which is made up of local authorities, interest groups representing local people, and industries using the airport.
- Press releases that detailed the Project elements and key milestones.
- Presentations and tours were hosted at the airport, which included information about the Project.
- Virtual meetings and presentations to local community members, with Q&A sessions.
- Re-introduced a community newsletter, which is circulated every 8-12 weeks.
- Meetings with over 51 local representative groups.

6.3.4 Additionally, GAL is committed to carrying out engagement with the local community during construction phase. GAL will require contractors to develop a Communications and Engagement Plan (CEP) in support, to ensure that all stakeholders are aware of the activities and are kept informed. Consultation and community engagement during construction would include:

- Regular meetings held between the lead contractor, GAL, the local authority and relevant stakeholders to discuss construction issues.
- Information sheets would be distributed by contractors to detail future works, including information on duration, working hours and the nature of work.
- A community landline would be operated by the lead contractor to deal with enquires and complaints. This would be in operation 24 hours a day.

7 Climate Change and Resilience

7.1.1 Consideration has been given to the potential impact climate change could have on the Project during its lifetime, and how resilient it is to predicted climatic changes such as increased flooding, and more extremes in temperature and wind speeds.

7.2 Minimising Flood Risk

7.2.1 The NPPF promotes resilience to future flood risk. It states that, in instances where development is necessary, measures (eg sustainable drainage systems) should be taken to avoid increasing risk of flooding and avoid vulnerable development within high-risk areas. In addition, the ANPS recognises the need to consider the flood resilience of the development and states that the development proposal should be supported by an appropriate FRA, and should not increase flood risk elsewhere.

7.2.2 Aligning with the ANPS, a site-specific FRA (see **ES Chapter 11: Water Environment** (Doc Ref. 5.1)) has been developed for the Project, which assesses the flood risk and presents the drainage strategy for the site in accordance with National Planning Policy Guidance (NPPG) (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, 2021). The Environment Agency Flood Zones

confirms that there are areas of Flood Zone 3 (areas at risk of flooding in a 1 per cent (1 in 100) Annual Exceedance Probability (AEP) event) and Flood Zone 2 (area at risk of flooding in between a 1 per cent and 0.1 per cent (1 in 100 to 1 in 1,000) AEP event) within the Project boundary. These areas are associated with the River Mole, Westfield Stream, Man's Brook, Crawter's Brook, and the Gatwick Stream.

7.2.3 Extensive areas of Flood Zones 2 and 3 have been identified outside of the Project site boundary, which relate to the River Mole and/or Gatwick Stream. These areas are situated in close proximity to residential areas and transport infrastructure that serves both Gatwick and the wider area.

7.2.4 According to the Environment Agency, Risk of Flooding from Surface Water (RoFSW) flood extents mapping, there are several areas of surface water flooding across the Project site. This includes:

- areas of medium to high risk of surface water flooding associated with existing watercourses and drainage features; and
- larger areas predicted to be at low risk situated to the south of the main runway and in close proximity to the terminal buildings.

7.2.5 The FRA considered mapping developed by the British Geological Survey (BGS 2022) and the Crawley Strategic Flood Risk Assessment (SFRA) (2020) to understand the overall risk of groundwater flooding at the Project site, identifying the risk as low to moderate. Nevertheless, all foundations and structures below ground that could potentially form a barrier to groundwater flow would be designed to allow these existing flows to function effectively. This would be informed by further ground investigation during the detailed design stage. As a result, this would prevent an increase in groundwater flood risk and would protect flood-sensitive receptors elsewhere.

7.2.6 The FRA has also considered the use of hydraulic modelling of flood risk to further explore flooding, taking into account potential future climate change impacts. This includes a 40% climate change allowance. This is in line with national policy that emphasises the need for developments to consider the resilience of developments to future flood risk, due to climate change, such as the ANPS and NPPF. The result of the modelling suggests that the Project site is considered to be at high risk of fluvial and surface water flooding.

7.2.7 During construction, surface water flood risk will be managed by the contractors who are required by GAL to consult with the relevant regulatory bodies regarding measures to be implemented to contain and manage surface water run-off from the construction side. This is to prevent deterioration of the water environment and other adverse impacts, including changes to flow volume, water levels and water quality anywhere in the river catchment or groundwater body. GAL requires its contractors to manage their site activities and working methods so that the quality of surface water and groundwater is protected. Construction activities will be carried out having regard to the requirements to avoid any significant increase in flood risk. Contractors are required to ensure that watercourses are kept clear of obstructions and debris to reduce blockage risk.

7.2.8 The Project would involve changes to the existing site, with an increase in the volume of impermeable surfaces across the airfield and highways improvements. Therefore, the Project would result in increased volumes of surface water running off site and potentially

into surrounding waterbodies. However, the Project includes a number of mitigation techniques and strategies to ensure the site remains resilient to future changes in precipitation levels and flooding, without increasing flood risk elsewhere. These mitigation proposals, developed in consultation with the Environment Agency, are highlighted below:

- Realignment and re-naturalisation of the River Mole will be undertaken immediately downstream of the runway culvert to increase its capacity and flow regime.
- Syphon connections are proposed, where taxiways would bisect parts of floodplain causing disconnection, to retain floodplain connection on both sides of the taxiway.
- Installation of syphons beneath the noise bund to maintain floodplain connectivity and reduce flood risk off-site.
- Creation of a new below ground attenuation feature south of the main runway to mitigate additional impermeable areas created by the Project. A pumping facility will ensure there is no additional discharge to the River Mole.
- The airfield and highways improvements include additional storage and attenuation measures to restrict peak runoff rates to ensure no increase in existing levels of flood risk, including an appropriate allowance for climate change.

7.2.9 Additionally, floodplain storage would be lost within the Project site due to ground raising for Project elements. As a result, the design includes the provision of compensatory flood storage. These include Museum Field Flood Compensation Area connected to the River Mole via a spillway and a flood compensation area at an existing car park (Car Park X). Ecological planting would be utilised to restore natural vegetation and minimise bank erosion.

7.2.10 In summary, the mitigation measures proposed will address the flood risk from all sources during the operation phase of the Project through appropriate sustainable drainage systems, underground storage tanks to assist with runoff attenuation, and syphons in order to maintain floodplain connectivity. This would ensure no increase in flood risk as a result of the Project, aligning with key national policy that highlights the need to avoid increasing flood risk and building resilience into the design, including the ANPS and NPPF. It also supports local policies that focus on effective flood management and adaptation, including the Crawley Planning and Climate Change SPD and the Reigate and Banstead Local Plan: Core Strategy.

7.3 Climate Change Resilience

7.3.1 An assessment concerning Climate Change Resilience (CCR) has been carried out for the Project, using a risk-analysis based approach, to understand the greatest climate change risks that require appropriate mitigation (see **ES Chapter 15: Climate Change** (Doc Ref. 5.1)).

7.3.2 During the construction stage, the greatest risks (identified as high risk) to the Project due to climate change have been identified as those arising from higher temperatures affecting temporary construction buildings and extreme weather events disrupting construction processes. Therefore, the CCR (risk based) assessment mitigation measures include the following:

- Cooling and ventilation systems would be included within the design of temporary office buildings in accordance with guidance from the Chartered Institution of Building Services Engineers (CIBSE).
- The CoCP sets out the requirements for a high level risk assessment of extreme weather impacts on construction processes, as well as training for staff to manage extreme weather events.

7.3.3 During operation, the greatest risks (identified as high risk) to the Project due to climate change have been identified as those arising from higher temperatures causing overheating in terminal buildings, hotels and other buildings, and drought causing water stress for buildings. The assessment recommended the following mitigation measures:

- The detailed design stage should consider the heating and cooling strategies of the existing buildings for the proposed buildings at risk.
- The design of proposed buildings should consider the potential impact of increased water stress. Additionally, the Gatwick Water Use Strategy should develop plans for reducing water use and promoting the re-use of water across the proposed buildings.

7.3.4 An assessment of in-combination climate change impacts (ICCI) has been carried out as part of the climate change assessment (ES Chapter 15; Climate Chapter). This has found that as a result of the climatic variations and through existing mitigation measures there would be no negative impacts to environmental receptors.

7.3.5 GAL has existing measures in place to minimise the impacts of extreme weather events, which includes the Gatwick Airside Operations Adverse Weather Plan that sets out processes and procedures for varying extreme weather events. Additionally, this Project would include the following measures and plans to ensure the impacts of extreme weather events are minimised during construction and operation:

- The CoCP (**ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)) will set out best practice methods during construction.
- Outline LEMP (**ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3)).
- The FRA details measures to ensure flood resilience under future projected climate change.

7.3.6 Overall, the Project would be designed to be adaptable to future impacts of climate change, as set out within Chapter 14 of the NPPF.

8 Greenhouse Gases

8.1 Introduction

8.1.1 Climate change is widely regarded as the most pressing challenge for sustainable development. The UK Sustainable Development Strategy, 'Securing the Future' (Defra, 2011) recognises climate change and energy as a priority area for UK's sustainable development. The Government has created a legally binding framework for reducing greenhouse gas emissions through to 2050 via provisions made in the Climate Change Act (2008). This establishes a specific duty on the Secretary of State to ensure that

greenhouse gas emissions are reduced by 100% by that date. On 12 June 2019, the UK Government (2019) revised their target committing to at least a 100% reduction of greenhouse gas emissions (compared to 1990 levels) in the UK by 2050.

8.1.2 At the COP26 summit in November 2021, parties voted to adopt the COP26 report known as the Glasgow Climate Pact (UNFCC, 2021). Countries were tasked to return in 2022 with more ambitious 2030 emissions reduction targets, which would keep temperature rise within 1.5°C this century rather than 2°C. Although the COP27 summit in November 2022 (UNFCC, 2022) did not see the progression of more ambitious emissions reduction targets, countries renewed their commitment to work towards limiting global climate change to 1.5°C.

8.2 Carbon Emissions Generated During Construction

8.2.1 The construction of the Project would result in the generation of GHG emissions, due to:

- the extraction, processing and manufacturing of construction materials;
- transportation of materials;
- energy and fuel use;
- transport and disposal of waste; and
- construction staff vehicle movements.

8.2.2 There would also be land use change impacts that could impact GHG emissions, however, it is expected land use change would be mitigated by the creation of new habitat areas that would sequester carbon once mature.

8.2.3 The CAP has the construction target to:

'develop and implement measures to prevent, reduce and remediate GHG emissions arising from the construction of the Northern Runway Project to ensure that these do not exceed 1.15 MtCO_2e.'

8.2.4 The CAP provides a list of carbon reduction opportunities to achieve this target, including carrying out feasibility studies, sustainable design practices, and the exploration into emerging technologies (e.g. low carbon concrete). A number of these measures will be carried out prior the commencement of the construction phase for the Project to ensure emissions are minimised.

8.2.5 Potential measures highlighted within the CAP that could be implemented to target construction emissions include the following:

- use low carbon or sustainable materials within new development;
- utilise materials with lower embodied carbon GHG emissions within design specifications, where practicable. This includes the reuse of materials, which is explored first, then the use of high recycled content materials;
- work with the supply chain to maximise the reuse of assets and materials throughout the Project;
- ensure the use of low and zero carbon construction generation and construction plant, where possible; and
- ensure the use of low or zero carbon vehicles, where possible.

8.2.6 The Project would also include a workforce travel plan (**ES Appendix 5.3.2: CoCP – Annex 2 -Outline Construction Workforce Travel Plan** (Doc Ref. 5.3)) that would support and encourage sustainable travel for construction staff, including public transport, car sharing, walking and cycling. This includes the provision of bus shuttle services. As a result, this would allow for the use of sustainable transport options during construction and thus, minimising transport emissions. This aligns with key principles of the NPPF and ANPS through the development of effective mitigation measures during construction.

8.3 Carbon Emissions Generated During Operation

8.3.1 Carbon emissions generated during the operation of the Project would be primarily associated with aviation emissions, although there would also be emissions resulting from surface access and airport buildings and ground operations (ABAGO).

8.3.2 A CAP (**ES Appendix 5.4.2 Carbon Action Plan** (Doc Ref 5.3)) has been developed, which builds upon Gatwick's Second Decade of Change and strengthens GAL's capacity to reduce GHG emissions. The CAP focuses on three key emissions sources: airport building and ground operations (ABAGO), aviation, and construction. It provides commitments for each emission source and includes a number of potential options that can be used to achieve the outcomes. In doing so, the CAP supports relevant emissions reductions targets, including the UK Government Net Zero target for 2050, as well as the Jet Zero 2050 target, which includes achieving zero emissions for airport operations by 2040.

Airport Buildings and Ground Operations (ABAGO)

8.3.3 ABAGO emissions include those that arise from energy use for buildings, infrastructure and operations. This includes heating, cooling, lighting and electricity within buildings, as well as fuels for airside and landside vehicles.

8.3.4 The CAP details the following ABAGO commitments:

- Gatwick will achieve Net Zero for GHG emissions under our control (GAL Scope 1 and 2[2]) by 2030.
- Gatwick will achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040, contributing to the UK Government's Jet Zero ambition "*for all airport operations in England to be zero emissions by 2040*".
- Gatwick will actively support the reduction of Scope 3 emissions arising from ABAGO.

8.3.5 These targets would be achieved through a range of carbon reduction measures, some options identified in the CAP are identified below.

8.3.6 Carbon reduction measures include installation of Light Emitting Diode (LED) lighting and Passive Infrared Sensors (PIRs), develop plans to deliver zero emission systems, and carrying out feasibility studies and explorations of emerging technologies. Following the

[2] Scope 1 emissions refer to direct emissions of GHGs from plant, equipment, vehicles owned by the reporting corporate entity (eg combustion of natural gas, vehicle fuels, and emissions of refrigerants) (WBCSD and WRI, 2015).
Scope 2 emissions include indirect emissions of GHGs associated with purchased electricity, steam, heating and cooling (purchased by the reporting corporate entity) (WBCSD and WRI, 2015).

implementation of carbon reduction measures, the CAP provides an option that Gatwick could use carbon removals for residual emissions of Gatwick-controlled emissions. As a result, this would ensure that the net zero target could be achieved.

8.3.7 Additionally, the CAP states that all new buildings included within the design of the Project would be designed and constructed for Net Zero emissions during the operational stage (Scope 1 and 2). This would contribute to the targets set by GAL and set out within the Jet Zero Strategy and UK Government Net Zero targets.

Aviation Emissions

8.3.8 Although GAL does not have direct control over aviation emissions, which result from aircraft owned by various airlines, GAL have the existing aim within the second Decade of Change to support the transition of the UK aviation industry towards Net Zero. The CAP builds upon this, providing the commitment that '*Gatwick will provide the appropriate infrastructure for sustainable aviation and play its part in advancing and implementing the UK Government's Jet Zero strategy*'.

8.3.9 The CAP identifies a list of measures that could be drawn from to achieve this aviation emissions commitment, including carrying out feasibility studies and explorations of emerging technologies where the feasibility and carbon saving potential will be better understood as technologies develop.

8.3.10 Additionally, it would be a priority for GAL to ensure it provides the infrastructure, systems and services in time to accommodate the changes that will develop in aircraft technology necessary to achieve the airlines' trajectory to Net Zero.

Surface Access Emissions

8.3.11 GAL can also better develop transport connections to the area through partnerships associated with their surface access strategy. The Surface Access Commitments comprise commitments to achieve aspirational mode share targets and thus, encourage sustainable transport (**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)). Furthermore, GAL has set targets within the Decade of Change to 2030 on tackling the emissions associated with surface access to the airport. GAL will look to work with transport partners to increase airport passenger and staff usage of public transport to a minimum of 60%. This commitment requires extensive collaboration to ensure that these transport modes are accessible, reliable, and affordable to ensure that the surface access strategy is effective. This surface access strategy has the potential to be linked to transport targets of the surrounding local authorities which could bring benefits to the region through better transport links and cleaner modes of travel.

Resources and Waste

8.3.12 The ANPS recognises the importance of protecting the environment and human health by minimising the production of waste, or reuse of potential waste. It states that waste should be sustainably managed both on-site and off-site, ensuring that the principles of the waste hierarchy are followed and that sufficient waste management facility capacity is provided. The ANPS states that the Waste Framework Directive (2008/98/EC) targets to divert construction and demolition waste from landfill (by preparing for re-use and recycling)

should be considered as the 'minimum acceptable practice' for the construction and operation of any new airport infrastructure. This includes targets for preparation for re-use and recycling of municipal waste (50%), and for construction and demolition waste (70%).

8.3.13 Additionally, the Circular Economy Package (CEP) introduces a legislative framework that identifies the steps for waste reduction, management and recycling. It aims to promote resource efficiency and minimise waste, with targets to recycle 65% of municipal waste and to have no more than 10% of waste to landfill by 2035 (Department for Environment, Food & Rural Affairs *et al*., 2020).

8.3.14 A responsible approach would be taken in managing resources in the construction phase. Specification of construction materials would follow best practice in selecting material that is responsibly sourced with low environmental impact and maximising efficient use of resources. All timber products would be responsibly sourced from reputable suppliers as per the UK Government's Timber procurement policy.

8.3.15 A Construction Resources and Waste Management Plan (**ES Appendix 5.3.2 – Code of Construction Practice Annex 5** (Doc Ref. 5.3)) has been developed, which sets out measures for managing waste during construction to meet legislative and policy requirements. The Construction Resources and Waste Management Plan details that waste will be minimised by removing components products and materials suitable for reuse/recycling/recovery prior to demolition, to ensure a circular approach to demolition waste. Additionally, the Project will aim to achieve the following targets for construction and demolition waste (excluding spoil) generated by the Project:

- divert 90% (by weight) of non-hazardous demolition materials from landfill; and
- divert 80% (by weight) of non-hazardous construction waste (ie non-demolition waste) from landfill.

8.3.16 This would help contribute to the Waste Framework Directive (2008/98/EC) targets to divert construction and demolition waste from landfill, which is highlighted within the ANPS. A pre-demolition audit will be undertaken for all buildings and structures to identify opportunities for assets, products and materials to be reused, recycled or recovered, thus minimising the amount of waste taken to landfill.

8.3.17 In order to maximise resource efficiency of the new buildings and structures, the detailed design stage would consider the following circular economy principles:

- Building in layers (ensuring that different parts of the building are accessible and can be maintained and replaced where necessary.
- Designing out waste – ensuring that waste reduction is planned in from project inception to completion.
- Designing for longevity.
- Designing for adaptability or flexibility.
- Designing for disassembly.
- Using systems, elements of materials that can be reused or recycled.

8.3.18 During construction, all waste on site is to be characterised and recorded. Waste storage areas would be provided at the construction site, located away from potential contaminant pathways (eg trenches, drains, etc.) to avoid the pollution of the surrounding environment.

8.3.19 The ANPS details the requirement to follow the waste hierarchy. This would be followed during construction, with aims to minimise and prevent waste as a first step. Excavated material is to be managed in line with the waste hierarchy with preference given to reuse where feasible and the design allows. Contractors are to implement all required environmental permits, exemptions, and a Materials Management Plan (see **ES Appendix 5.3.2 CoCP Annex 5 -Construction Resources and Waste Management Plan** (Doc Ref. 5.3)) for the reuse of made ground and contaminated soils (in accordance with the Definition of Waste: Development Industry Code of Practice). Materials that are not suitable for reuse or is excess to requirements would likely be managed as waste.

8.3.20 Additional measures to minimise quantities of waste during construction include the following:

- a logistics system which allows 'just-in-time' deliveries to minimise the length of time materials are stored on site which increases the risk of damage and disposal as waste;
- providing suitable and secure storage for materials where 'just-in-time' deliveries cannot be set up;
- agreements with material suppliers to reduce the amount of packaging
- mechanical systems and machinery would be considered for moving materials to reduce the risk of damage; and
- where possible, programming and monitoring construction activities to avoid overlap of incompatible trades working in the same area and to reduce the potential for waste to be generated from replacing damaged work.

8.3.21 All waste that cannot be reused, recycled or recovered would be collected by the licensed waste management contractor and disposed of at a permitted site suitable for the type of waste. All carriers are to provide waste transfer or consignment notes which will be retained for the appropriate legal period.

8.3.22 GAL have the overarching objective within the Decade of Change Policy to 2030:

'Ensure that by 2030 all materials used at Gatwick in operations, commercial activity and construction, are repurposed for beneficial use i.e. repaired, reused, donated, recycled, composted or converted to fuel for heating or transport.'

8.3.23 In working towards this target, Gatwick includes airport waste collection and transport logistics, Mixed Recycling Facility located onsite, and onsite biomass boiler to convert food waste into renewable heat. The Project also includes the demolition and replacement of the existing Central Area Recycling Enclosure (CARE) facility, which processes food waste for energy. The new facility would be designed to process a larger volume of waste, include two biomass boilers, and include a materials recovery facility to allow sorting of waste.

8.3.24 Therefore, the construction and operation of the Project would include the sustainable management of waste and would provide sufficient waste management facility capacity, as set out within the ANPS. As a result, this would help contribute to the Waste Framework Directive (2008/98/EC) targets preparation for re-use and recycling of construction/demolition waste set out by the ANPS, as well as the targets introduced through the Circular Economy Package (CEP).

8.4 Materials

8.4.1 The Project would include a circular approach during construction through the minimisation of waste and maximisation of material reuse. As mentioned in section 7.4.4, materials suitable for reuse/recycling/recovery would be removed from structures and buildings, prior to demolition works. The Project will also aim to reuse excavated materials on-site, which will reduce waste sent to landfill. Surplus materials would be sent off-site for reuse elsewhere. Opportunities to design out waste and promote a circular approach would be investigated during the detailed design stage. These could include:

- using offsite manufacture of design elements;
- incorporating temporary working platforms (created during the construction phase to allow plant and vehicles to travel and operate) into the final structure;
- improving wastage rates during procurement; and
- purchase requirements.

8.4.2 The Construction Resources and Waste Management Plan considers opportunities to reuse waste and materials, which will be explored further within the Site Waste Management Plans that will be prepared post consent.

8.4.3 All timbers used as primary structural elements would be required to be sourced using responsible sources, such as Forest Stewardship Council (FSC) certified materials and Programme for the Endorsement of Forest Certification (PEFC), where possible.

8.4.4 The construction process would take into account the principles of good practice in soil handling and restoration set out in the following documents, wherever possible, to reduce the possibility of damage to soil materials during the construction process:

- Ministry of Agriculture, Fisheries and Food (MAFF) (2000) Soil Handling Guide; and
- Department for Food and Rural Affairs (Defra) (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including the Toolbox Talks).

8.5 Water Use

8.5.1 A development's construction phase has the potential to use a large amount of water. Whilst much of the water is essential for building activities, and cannot be reduced, water would be monitored to ensure that it was not wasted. The contractor would monitor water use during construction and include procedures to ensure leakages are minimised across the construction site. In addition to this, water conservation would be employed where possible. This could include pressure management, grey water recycling and rainwater harvesting, and water efficient controllers on tap and urinals.

8.5.2 GAL have an overarching objective within the Decade of Change Policy to 2030 to reduce potable water consumption by 50 % per passenger by 2030, compared with a 2019 baseline. To contribute towards these targets, new buildings as part of the Project would have appropriate water efficient fixtures and fittings as well as opportunities to collect and use non-potable water..

8.5.3 In terms of wastewater, the Urban Wastewater Treatment Directive aims to protect the environment from the adverse effects of the collection, treatment and discharge of urban

wastewater. It affects consideration of future discharges to receiving water courses. It also influences the need for additional water treatment at the pollution storage lagoons.

8.5.4 In fact, the Project includes the development of a new treatment system at the storage lagoons. It would treat the stored contaminated runoff prior to discharge into Gatwick Stream, or for re-use within the airport. There would also be improvements to the existing wastewater sewer system, including replacement of pumps and pumping main to provide additional capacity, and the construction of a new pumping station.

9 Conserving and Enhancing the Natural & Historic Environment

9.1 Natural Environment

9.1.1 The relevant legislation to the ecological impact of the Project are as follows:

- The Environment Act 2021;
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Protection of Badgers Act 1992;
- Wild Mammals Protection Act 1996; and
- The Hedgerow Regulations 1997

9.1.2 Within this legislation, the variety of species and habitats which are afforded protection are laid out. Gatwick must ensure that such habitats species are protected from destruction, killing or injury, and disturbance. The mitigation proposed in this section is therefore a legal requirement in respect of these species and habitats.

Designated Sites

9.1.3 There are no statutory designated sites situated within the site, or within close proximity. The closest statutory designated site is Willoughby Fields Local Nature Reserve (LNR) located 786 metres to the south of the Project site.

9.1.4 There are three internationally designated sites within 20 km of the Project site boundary which are Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), Ashdown Forest SAC and Ashdown Forest SPA. There are also 11 nationally designated sites within 5 km of the Project site boundary.

9.1.5 Due to the distance between the statutory designated sites and the Project site boundary, and along with the pollution prevention measures set out within the CoCP, the construction of the Project would have no impact on statutory designated sites.

Habitats

9.1.6 The Project site largely comprises low value habitats associated with the airport and its infrastructure. The site is made up of large areas of hardstanding and amenity grassland,

with areas of ornamental shrub and tree planting. A Phase 1 Habitat Survey has been carried out, which shows that there are areas of high value habitat located to the east and west of the Project site.

- The Land East of the Railway Line (LERL) – comprises broadleaved woodland, neutral grassland (including a flood storage area) and the Gatwick Stream.
- River Mole corridor in the west – comprises the River Mole, with a variety of neutral grasslands and broadleaved woodland.

9.1.7 The habitat survey also identified smaller areas of high value habitat in the north, including Riverside Garden Park, and in the south, including Crawter's Field.

9.1.8 To ensure the protection of the natural environment, in line with the key national policy such as the NPPF and ANPS, the Project has been designed to avoid designated sites, areas of woodland and other ecologically sensitive habitats, wherever practicable. A vegetation retention strategy is to be put in place to ensure green infrastructure assets are retained wherever possible and adverse impacts on the important features are minimised. This strategy is also in place to minimise the impact on the character of the surrounding landscapes and townscapes, to protect important urban green spaces including Riverside Garden Park, and to ensure that all visually significant vegetation is retained to minimise the impact on visual receptors.

9.1.9 During construction, protective fencing, in accordance with BS 5837, would be erected around bat foraging/commuting habitat and areas of trees, hedge or scrub to be retained to prevent access by people, materials or machinery. This would reduce the risk of accidental damage during construction activities. There would also be a minimum 15 metre buffer between ancient woodland and construction areas. Overall, this would minimise the impact of construction on features of ecology and nature conservation value.

9.1.10 Measures would also be put in place to ensure that bat foraging/commuting habitat and areas of trees, hedge or scrub to be retained are adequately protected from damage or destruction during the construction phase of the Project. This would be implemented through the Construction Code of Practice (**ES Appendix 5.3.2** (Doc Ref. 5.3)).

9.1.11 The Project includes control measures that will contain specific details on how construction lighting will be directional, away from sensitive receptors which is particularly relevant to the maintenance of the dark corridor along the Gatwick Stream where it meets the River Mole.

9.1.12 The Project would include measures to avoid pollution, such as the appropriate storage of materials and fuels, as well as effective dust management to avoid pollution of designated sites, ancient woodland and local water bodies. These measures proposed for the construction phase will be managed through the CoCP to ensure that harm to the natural environment is avoided.

9.1.13 However, during the construction period, the Project would require the removal of species-poor hedgerow, plantation woodland and scrub habitat. This would result in some temporary adverse impacts on bird species, as well as invertebrate and bat assemblages. As a form of mitigation, additional hedgerow planting would be undertaken early in the construction period on parts of the Project site, which would enhance habitat connectivity in

these areas. Also, where practicable, areas of semi-natural broadleaved woodland due to be lost would be cleared sensitively so that bluebell bulbs could be collected and replanted within new woodland. As a result, this would reduce the impacts on the protected species.

9.1.14 GAL has stated in their Decade for Change to 2030 that they aspire to have a sector-leading 'net gain' approach to protecting and enhancing biodiversity and habitats on the airport estate. As is detailed in the Ecology & Nature Conservation chapter (**ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.1) the Project achieves a biodiversity net gain of 20%. This supports the NPPF and biodiversity strategy, which provides a commitment to halt the overall decline in biodiversity.

9.1.15 The Project's mitigation strategy includes the creation of mitigation areas in the west and north west of the Project site. It would include the reinstatement and introduction of new habitats across the site. This would include the following:

- the creation of new riparian habitat along the diverted River Mole;
- a mixture of wet and dry grasslands within the Museum Field flood compensation area;
- creation of an earth bund in the south and east of Museum Field, which would provide a mosaic of habitats;
- creation of woodland, wet woodland, scrub, and species-rich grassland;
- compensatory woodland along new highway alignment, in Pentagon Field, and north and east of Longbridge Roundabout;
- tree and shrub planting to reinforce retained tree lines within existing car parks;
- creation of attenuation ponds and drainage ditches supporting reedbeds, wet grassland and marginal plants; and
- creation of refugia and hibernacula within newly created habitats for great crested newt (GCN) and grass snake.

9.1.16 Therefore, the above demonstrates that the Project would ensure the protection and enhancement of the natural environment, in line with national policy such as the ANPS and NPPF.

Species

9.1.17 An ecological desk study, Phase 1 habitat survey and a number of terrestrial and aquatic surveys were undertaken during the period 2018 to 2022 (**ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.1)).

9.1.18 The breeding bird survey recorded 72 species within the Project site and surrounding study area, with a breeding assemblage of 51 species. This included peregrine, little ringed plover and firecrest, which are listed under Schedule 1 of the WCA 1981. Prior to construction, additional breeding bird surveys would be carried out to determine the presence of Schedule 1 species; peregrine, little ringed plover and firecrest. As required, best practice measures would be put in place, including ensuring that clearance of any habitat that may support breeding birds would be undertaken outside of breeding bird season. The CoCP would ensure that existing trees to be retained are fully protected during construction. A suitably sized buffer would be retained around active nests to avoid disturbance, thus ensuring the protection of bird species in line with local and national policy.

9.1.19 Furthermore, the mitigation strategy includes the creation of an attenuation pond with supporting reedbed to provide high value habitat for breeding birds, as well as tree and shrub planting within built up areas. This would increase the connectivity of the local environment and provide nesting sites for breeding birds.

9.1.20 Surveys identified a number of suitable habitats for reptiles, including wet and marshy areas, dense and scattered scrub, taller areas of grassland and earth banks. Grass snakes were also identified within the Project site. During construction, there would be impacts associated with the loss and disturbance of suitable reptile habitats. However, areas of lower value reptile habitat that could support low numbers of grass snake (eg drainage ditches) would be cleared sensitively, with an ecological clerk of works present, to ensure that the species are protected.

9.1.21 A number of ponds and linear water features were identified as suitable to support amphibian species. GCN, which is a European protected species and fully protected under Schedule 5 of the WCA 1981, was also recorded within four ponds across the site. To ensure the conservation of GCN, species would be translocated into receptor areas prior to construction.

9.1.22 The Project includes the creation of attenuation ponds and drainage ditches supporting reedbeds, wet grassland and marginal plants. This would provide important habitat for invertebrates and amphibians. Mitigation areas in the west and north west of the Project site would also incorporate refugia and hibernacula within newly created habitats for GCN and grass snake.

9.1.23 During surveys, there was evidence of Badger presence within the Project site. Badgers and their setts are protected under the Protection of Badgers Act 1992. The following measures would be implemented to ensure that no badgers are harmed during the construction phase:

- suitably sturdy fencing to be erected around all construction works to deter foraging badgers from the works' areas;
- any excavated holes to have a wooden board placed in them over night so as to provide a means of escape should any badgers accidentally enter the excavation; and
- any chemicals to be securely stored at night in a locked container.

9.1.24 The desk study provided records for at least fourteen bat species within and immediately adjacent to the Project site. Surveys also identified high value foraging and commuting habitat within the woodland areas in the east of the Project site, along woodland edges, river corridors and mature hedgerows and treelines. Lighting during both construction and operation would be designed to avoid disturbance to areas suitable for bats. Construction lighting would also be managed through the implementation of the CoCP. Furthermore, trees with Medium or High bat roost potential will be subject to appropriate surveys, which will inform specific mitigation measures to be employed during construction.

9.1.25 The Project has included sufficient mitigation proposals to enhance the suitability of the landscape for species, such as bats. The extension of the existing woodland and tree/shrub planting would ensure that habitat connectivity is retained for commuting and foraging bats.

9.1.26 The outline LEMP (**ES Appendix 8.8.1 : Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3)) details a number of measures for the conservation and enhancement of species populations, including birds, bats, badger, reptiles and amphibians, and terrestrial invertebrates. Furthermore, the Project includes monitoring of GCN, grass snake populations, bat activity and badgers setts to determine the success of mitigation measures, and allow for further measures to be defined if necessary. This would ensure that the Project avoids adverse impacts on habitats and species, thus protecting and conserving the natural environment.

9.1.27 The above demonstrates that the Project has considered the protection and enhancement of the natural environment through the conservation of important species. It incorporates a number of mitigation measures within the design to ensure the protection, enhancement and compensation of features that provide high value habitat for birds, bats, amphibians, reptiles, and other species. Therefore, this supports key principles of the NPPF and ANPS, as it maintains the functionality and connectivity of the green infrastructure network.

9.1.28 In terms of local policy, the Project aligns with the sustainability objective six of the Crawley Borough Local Plan which is centred around the conservation and enhancement of the biodiversity and habitats, the key landscape features, flora, and fauna within the borough. It also supports the Reigate and Banstead Local Plan (Core Strategy) which includes aims to maintain and enhance the borough's valued landscapes, which include the natural environment and the associated habitats and species.

Landscape

9.1.29 The Project is not located within any designated Area of Outstanding Natural Beauty (AONB) or National Park. There are three AONBs and a National Park within the wider area, including:

- High Weald AONB, situated approximately 3 km to the south east of the Project site;
- Surrey Hills AONB, approximately 7.7 km to the north west;
- Kent Downs AONB, approximately 15 km to the north east; and
- South Downs National Park, approximately 22.5 km to the south.

9.1.30 There is intervisibility between Gatwick and High Weald AONB with potential for some construction activities (eg cranes) to be visible in distant views. There would also be potential for some limited visibility from Surrey Hills AONB and Kent Downs AONB, as Gatwick provides a distant backdrop to these areas. However, the Project would be seen in the existing context of the settlement of Crawley and the existing airport.

9.1.31 Furthermore, the Project would retain the existing green infrastructure assets, where possible, to minimise impacts on the surrounding landscapes and protect the natural beauty and setting of the AONBs. The Project also includes proposed earth shaping, embankments and cuttings or bunds to provide visual screens and opportunities for the creation of diverse habitats. This would ensure that the Project avoids significant harm to the surrounding designated landscapes, which aligns with the NPPF, ANPS and Aviation Policy Framework. It would also align with local policy that emphasises the need to protect the valued landscapes.

9.1.32 Due to the distance from South Downs National Park, there would be no intervisibility between the designated landscape and the Project.

9.1.33 During construction, there would be temporary impacts on the surrounding landscape character and views as the Project would create a temporary discordant element into the existing airport. There would also be landscape changes resulting from the removal of grassland, trees and openness as part of the surface access improvement works at Longbridge Roundabout, which is located within Mole Valley Open Weald. However, mitigation planting and new public open green space would be provided as part of the Project, which would partially offset these impacts.

9.1.34 During the operational phase, it would be difficult to differentiate between the new and existing buildings within Gatwick. Therefore, views of the Project would be seen within the existing context of a built airport environment. Nevertheless, the Project design includes proposed earth shaping, embankments and bunds to ensure that visual screens are provided to minimise adverse impacts on visual receptors.

9.1.35 A lighting strategy has been developed, which takes into account the Guidance Notes for the Reduction of Obtrusive Light (Institute of Lighting Professionals, 2011). The strategy considers measures to minimise lighting impacts on biodiversity, local residents and users of public rights of way and open space. This would ensure that lighting is designed to minimise adverse impacts on the surrounding landscape, whilst ensuring safety and security for the airport.

9.1.36 An outline LEMP (**ES Appendix 8.8.1 : Outline Landscape and Ecology Management** (Doc Ref. 5.3)) has been developed to provide details of the overarching landscape and ecology strategy of the Project. It outlines the various landscape zones that would be created as part of the Project and the strategy for management and maintenance. The landscape strategy includes:

- native woodland planting;
- marginal and aquatic planting along river corridors;
- mown grassland habitats on airside areas;
- public open space incorporating flood compensation area;
- native hedgerow planting to supplement existing field boundaries;
- semi-ornamental planting; and
- amenity grassland habitats.

9.1.37 This would ensure that the Project integrates the existing landscape features into the development, whilst promoting biodiversity and enhancing the local landscape. This aligns with key principles of the NPPF and ANPS, which highlight the importance of protecting the connectivity of green infrastructure and maintaining the value of the natural landscape.

9.1.38 Furthermore, the Project would provide new areas of public open space with links to the existing area of Riverside Garden Park at Car Park B and Church Meadows. It would also provide an extension to the River Mole footpath and associated publicly accessible land at Museum Field and Brook Farm. This would have benefits for the community, as well as enhancing the landscape and amenity value of the area.

9.1.39 The above demonstrates that the Project would ensure the conservation and enhancement of the natural landscape, supporting key principles of the NPPF and ANPS. These policies promote the conservation and enhancement of biodiversity, emphasising that development should minimise significant harm to the natural environment, including through the use of mitigation measures and consideration of alternative designs. It also aligns with 'Beyond the Horizon', which highlights that proposals for expansions and improvements should consider the environmental impacts and proposed associated mitigations.

9.2 Historic Environment

9.2.1 In terms of the historic environment, there is a conservation area situated partially within the Project site. This is the Church Road Conservation Area, which is located on the northern Project site boundary and on the south western edge of Horley. The Conservation Area comprises a number of historic buildings including the Grade I listed Church of St Bartholomew and the adjacent Grade II listed Ye Olde Six Bells public house. The section of the Church Road Conservation Area that falls within the Project site area includes open land.

9.2.2 The Project would result in some temporary effects to the setting of the Church Road Conservation Area due to the construction and use of a construction compound and the highways improvements at Longbridge Roundabout. However, the Lighting Strategy aims to avoid light spill from the compound across the land within the Conservation Area and east of the River Mole to reduce impacts to the historical setting. Planting proposals to strengthen the vegetation screen around the edges of the conservation area would reduce and potentially eliminate the visibility of existing and proposed building elements at the airport and Longbridge Roundabout.

9.2.3 Proposed design of mitigation land at Longbridge Roundabout has considered enhancement for Church Road (Horley) Conservation Area, which would increase public access and the creation of an area for informal recreational use, as well as additional planting. This aligns with Policy CH13: Conservation Areas, of the Crawley Borough Local Plan (2015-2030), which states that development should '*maintain and enhance the area's landscape value with regards to mature trees, hedges and public green spaces such as grass verges'*.

9.2.4 There are further Conservation Areas located wholly or partially within 1 km of the Project site boundary, which are at:

- Burstow to the east of the airport;
- Charlwood to the west of the airport; and
- Massets Road, Horley to the north of the airport.

9.2.5 However, buildings within Charlwood Conservation Area are screened from the Airport due to existing vegetation and built environment. The vegetation retention strategy would ensure that existing significant hedgerows, woodland and trees are maintained during the construction phase or maintenance activities. As a result, construction and operation would not have adverse visual impacts on the setting of the area. However, there would be some impacts associated with increases in ground noise during operation of the airport. Despite this, the Project would include measures designed to reduce noise, which are highlighted

within paragraphs 4.2.34 to 4.2.40. These noise measures would reduce any potential adverse impacts to the setting of heritage assets.

9.2.6 Within 1 km, there are two Scheduled Monuments, which include:

- Medieval settlement remains at Tinsley Green, approximately 200 metres to the south east.
- Thunderfield Castle medieval moated site, situated approximately 800 metres to the north east.

9.2.7 The Project would not adversely impact these designated Scheduled Monuments due to the lack of intervisibility between the sites.

9.2.8 There are three Grade I listed churches within 1 km of the Project site boundary.

- The Church of St Bartholomew at Church Road, Horley
- The Church of St Nicholas is in the western part of the village of Charlwood, west of the airport
- The Church of St Bartholomew at Burstow, east of the airport

9.2.9 There are eight Grade II* listed buildings within 1 km of the Project site boundary, which include:

- Charlwood House
- Gatwick Manor Inn
- Church of St Michael and All Angels
- Rowley Farmhouse
- The Beehive
- Charlwood Park Farmhouse
- The Providence Chapel on Chapel Road
- The Manor House on Norwood Hill Road at Charlwood

9.2.10 The Project would not create adverse visual impacts for the setting of the above Grade I and Grade II* listed buildings because the additional airport buildings and infrastructure would be seen within the context of the existing national airport. As a result, there would be limited changes to the existing views from these designated assets.

9.2.11 However, noise impacts associated with construction could have impacts on the setting of designated assets, including the Grade I listed Church of St Bartholomew (Horley) and the Grade II* listed Church of St Michael and All Angels (Lowfield Heath). Construction would be undertaken in accordance with a CoCP which would set out the key management measures for controlling construction noise. This would ensure that construction noise in minimised to avoid detrimental impacts to the setting of designated assets.

9.2.12 In terms of archaeological / buried remains, the design of the Project has considered the likelihood of archaeology across the Project site. Where proposed construction compounds are situated on previously developed land, archaeological remains are likely to have been already lost or badly damaged. Therefore, there would be no impacts associated with these compounds. However, where compounds are on undeveloped land, archaeological investigations undertaken have established there is little or no potential for buried archaeological remains to exist at those locations. As a result, the temporary construction

of construction compounds is unlikely to have adverse impacts on potential archaeological assets.

9.2.13 Although large sections of the Project site have been previously disturbed, resulting in low archaeological potential, the design includes development on areas of undeveloped land that has high potential for archaeological remains. Appropriate mitigation measures would be incorporated into the Project to avoid or reduce damage to the buried archaeological remains. However, where this is not possible, there would be a programme of archaeological investigation prior to construction to record and remove the asset, in order to offset the effect.

9.2.14 In summary, the Project would not adversely impact the setting of designated heritage assets due to sufficient screening and thus, lack of intervisibility between sites. The Project would also be seen in the context of the existing national airport. This supports the ANPS and Chapter 16 of the NPPF, which highlight the need to avoid adverse impacts on heritage assets, such as listed buildings and scheduled monuments.

10 Conclusion

10.1.1 This Sustainability Statement has evaluated the Project against principles of sustainability and the relevant national and local policy documents. Consideration has been given to the three pillars of sustainable development; economic, social and environmental, allowing the development to demonstrate how it is contributing to the delivery of sustainable development.

10.1.2 The Project has potential to bring economic benefits during the construction phase through employment opportunities for local skilled tradesmen and opportunities to develop the local skills base through the ESBS. It will also lead to the generation of employment during operation and would provide indirect benefits for local businesses, which can help drive further investment and attract additional businesses to the local area.

10.1.3 The Project would provide appropriate lighting, which is detailed within the lighting strategy, and has been designed to minimise adverse levels of air quality, ground contamination and noise pollution to ensure there are no detrimental health impacts for the construction workforce, operational staff and local community.

10.1.4 Gatwick provides a range of sustainable transport options, which could provide opportunities for walking and cycling, as well as the use of public transport. As part of the Project, there would be improvements to active travel routes (ie walking and cycling) and a travel plan would be implemented to encourage the use of sustainable transport options during both construction and operation.

10.1.5 The Project has been designed to ensure a high-quality built environment and includes improvements to the highway network to facilitate greater capacity, the development of buildings that reflect the existing built environment, and proposed landscaping and planting to ensure there is sufficient visual screening. It would also ensure the functionality and connectivity of green infrastructure is maintained and enhanced, which is a key principle of national policy.

10.1.6 Although the Project would lead to the generation of GHG emissions during both construction and operation, a range of mitigation measures have been incorporated to reduce associated GHG emissions. A CAP has been developed, which aligns with Jet Zero and other UK aviation policy to become net zero by 2030. It focuses on reducing emissions across three main sources, including airport building and ground operations (ABAGO), aviation, and construction.

10.1.7 To maximise resilience to climate change, the Project design includes the creation of flood compensation areas and attenuation features, re-alignment of the River Mole, and the use of sustainable drainage systems. A Climate Change Resilience Assessment has also been carried out and proposed a number of measures that should be incorporated within the development to ensure climate resilience.

10.1.8 A responsible approach to managing all resources (eg energy, water, materials and waste) during both the construction and operation phase has been considered and would be taken forward for the development. This includes employing the principles of the waste hierarchy, which is detailed within the waste strategy.

10.1.9 There are no designated historic or ecological sites located within the Project site. The Project has been designed to avoid designated sites, areas of woodland and other ecologically sensitive habitats and includes a vegetation retention strategy to ensure green infrastructure assets are retained, where possible. In addition, measures are in place to ensure protection of habitats and species, as well as an outline LEMP to provide biodiverse habitats, compensatory planting, and screening value.

10.1.10 It can be concluded that together, the site location, design and proposed mitigation measures would enable a sustainable development to be delivered which supports a number of relevant local and national planning policies and principles and addresses the three pillars of sustainability.

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Glossary

Term	Description
ABAGO	Airport Buildings and Ground Operations
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APF	Aviation Policy Framework
APU	Auxiliary Power Units
ANPS	Airports National Policy Statement
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
ASAS	Airport Surface Access Strategy
ATM or ATMs	Air Traffic Movement(s): Commercial landings or take-offs of aircraft engaged in the transport of passengers, freight or mail on commercial terms (i.e. scheduled, charter and dedicated freighter flights)
BAP	Biodiversity Action Plan
BSI	British Standards Institute
CAA	Civil Aviation Authority
CAP	Carbon Action Plan
CARE	Central Area Recycling Enclosure facility
CBC	Crawley Borough Council
CCAR	Climate Change Adaptation Report
CCAs	Climate Change Allowances
CCC	Committee on Climate Change
CCR	Climate Change Resilience
CH4	Methane
CIRIA	Construction Industry Research and Information Association
CITB	Construction Industry Training Board
CO	Carbon Monoxide
CO2e	Carbon dioxide equivalent
CoCP	Code of Construction Practice
CoP	Code of Practice
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
CTMP	Construction Traffic Management Plan
CWRMP	Construction Waste and Resources Management Plan
DAS	Design and Access Statement
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport

Term	Description
DLUHC	Department for Levelling Up, Housing and Communities
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
EIA	Environmental Impact Assessment
EPA	Environmental Protection Act
ES	Environmental Statement
ESBS	Employment, Skills and Business Strategy
ETS	Employment and Training Strategy
EU	European Union
FCA	Flood Compensation Area
FRA	Flood Risk Assessment
FTE	Full Time Equivalent
GAL	Gatwick Airport Limited
GCN	Great Crested Newt
GHG	Greenhouse Gas
GLVIA	Guidelines for Landscape and Visual Impact Assessment
GWDTE	Groundwater Dependent Terrestrial Ecosystem
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
ICAO	International Civil Aviation Organization
ICCI	In-combination Climate Change Impacts
IEMA	Institute of Environmental Management and Assessment
ILS	Instrument Landing System
LAeq, 16 hours	The LAeq over the daytime and evening period 07:00 to 23:00 hours, for aircraft noise for an average summer day between 16 June and 15 September. In this report all noise levels are A-weighted and in places the A is omitted for simplicity written Leq, 16 hour
LAeq, 8 hours	The LAeq over the night period 23:00 to 07:00 hours, for aircraft noise for an average summer night between 16 June and 15 September. In this report all noise levels are A-weighted and in places the A is omitted for simplicity written Leq, 8 hour
LEMP	Landscape and Ecology Management Plan
LEP	Local Enterprise Partnership
LNR	Local Nature Reserve
LTP	Local Transport Plan
LTVIA	Landscape and Townscape Visual Impact Assessment
mbu	Making best use
MHCLG	Ministry of Housing, Communities and Local Government

Term	Description
MMP	Materials Management Plan
mppa	million passengers per annum
MRF	Materials Recovery Facility
N2O	Nitrous Oxide
NCA	National Character Area
NCR	National Cycle Route
Net Zero	Net zero refers to a state in which the greenhouse gases going into the atmosphere are balanced by removal out of the atmosphere in line with a science based trajectory.
NNNPS	National Networks National Policy Statement
NNR	National Nature Reserve
NO2	Nitrogen dioxide
NOx	Nitrogen oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NPR	Noise Preferential Route
NPS	National Policy Statement
NPSE	Noise Policy Statement for England
NPSNN	National Policy Statement for National Networks
NRP	Northern Runway Project
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptor
NTS	Non-Technical Summary
OCTMP	Outline Construction Traffic Management Plan
OCWTP	Outline Construction Workforce Travel Plan
OESBS	Outline Employment, Skills and Business Strategy
OLEMP	Outline Landscape and Ecology Management Plan
ONS	Office for National Statistics
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PM10 and PM2.5	Particulate matter
PRoW	Public Right of Way
PTAR	Preliminary Transport Assessment Report
RBBC	Reigate and Banstead Borough Council
SAC	Special Area of Conservation
SACs	Surface Access Commitments
SAF	Sustainable Aviation Fuel
SASH	Surrey and Sussex Healthcare NHS Trust
SCC	Surrey County Council
SEP	Strategic Economic Plan

Term	Description
SERTM	South East Regional Transport Model
SESW	Sutton and East Surrey Water
SFRA	Strategic Flood Risk Assessment
SMEs	Small and medium-sized enterprises
SMS	Soil Management Strategy
SNCI	Site of Nature Conservation Importance
SO2	Sulphur dioxide
SoCC	Statement of Community Consultation
SPA	Special Protection Area
SPD	Supplementary Planning Document
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
SWMP	Site Waste Management Plan
TA	Transport Assessment
TDP	Transport Decarbonisation Plan
TfL	Transport for London
UK	United Kingdom
UKCP	UK Climate Projections
UKCP18	UK Climate Predictions 2018
UXO	Unexploded Ordnance
VOC	Volatile Organic Compounds
WCA	Wildlife and Countryside Act
WFD	Water Framework Directive
WHO	World Health Organization
WMP	Waste Management Plan
WSTP	West Sussex Transport Plan
WSCC	West Sussex County Council
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

Appendix A: Summary of Mitigation Measures included as Part of the Project

Sustainability Objectives			High-level Mitigation																																									
Gatwick Sustainability Statement	**NPPF**	**Airports NPS**	**Employment, Skills and Business Strategy (ESBS)**	**Outline Lighting Strategy**	**Dust Control Measures**	**Code of Construction Practice (CoCP)**	**Construction Transport Management Plan (CTMP)**	**Surface Access Commitments**	**Travel Plan (Construction & Operation)**	**Carbon Action Plan**	**Remediation Strategy**	**Discovery Strategy**	**Unexploded Ordnance (UXO) Mitigation Strategy**	**Noise Insulation / Temporary re-housing during construction**	**International Civil Aviation Organization (ICAO) approach for aircraft noise management**	**Noise Insulation Scheme**	**Noise Mitigation Measures (eg bunding, noise barriers, etc.)**	**Improvements to active travel routes (eg cycling and walking)**	**Airport Surface Access Strategy**	**Temporary diversion routes for traffic and pedestrians during construction**	**Public Transport Investment**	**Increasing airfield capacity of Gatwick**	**Surface Access Improvements**	**Outline Landscape and Ecology Management Strategy (LEMP)**	**Proposed planting**	**Outline Soil Management Strategy**	**Communications and Engagement Plan (CEP)**	**Re-alignment of River Mole**	**Provision of Compensatory Flood Storage**	**Sustainable Drainage Systems (SuDS)**	**Gatwick Airside Operations Adverse Weather Plan**	**Waste Strategy**	**New Central Area Recycling Enclosure (CARE) facility**	**Responsibly sourced materials (eg FSC timber)**	**New water treatment system**	**Vegetation Retention Strategy**	**Mitigation of Buried Archaeological Remains**	**Church Road (Horley) Conservation Area Enhancement**	**Proposed Public Open Space and Footpaths**	**Management measures for the protection of species and habitats**	**Pollution Prevention Measures**	**CCR (risk based) Assessment Mitigation Measures**
Strong Economy	Building a Strong, Competitive Economy	Economy	X																			X																						
Strong, Healthy and Safe Communities	Vitality of Town Centres	Community		X		X	X				X	X		X	X	X	X	X		X	X		X	X				X		X							X		X	X		X	
	Strong, Healthy and Safe Communities	Quality of Life		X	X	X	X	X	X		X	X	X	X	X	X	X	X		X	X		X	X				X		X							X		X	X		X	
		Noise				X	X		X					X	X	X	X		X																		X		X	X		X	
		Air Quality			X	X	X	X	X	X										X																								
Sustainable Transport	Sustainable Transport					X	X	X	X	X									X	X	X	X			X															X				
Effective and Well Designed Places	Effective Use of Land	Soil				X					X	X													X		X									X				X			
	Protecting Green Belt	Biodiversity				X																			X	X			X	X						X		X		X	X		
	Well Designed Places			X				X		X							X		X			X	X	X	X			X	X	X			X	X	X		X	X			X	
Climate Change	Sustainable Use of Minerals	Resources & Waste				X				X									X						X	X		X	X	X										X		
	Climate Change & Flood Risk	Carbon				X	X	X	X	X								X	X		X				X	X		X	X	X	X	X	X	X				X		X	
		Water				X				X																		X	X	X									X	X	
Conserving and Enhancing the Natural and Historic Environment	Conserving & Enhancing the Historic Environment	Historic Environment		X		X											X							X	X				X						X	X	X	X			
	Conserving & Enhancing the Natural Environment	Landscape		X	X	X											X	X						X	X			X	X						X		X	X	X	X		