



Gatwick Airport Northern Runway Project

The Applicant's Response to Written Representations

Book 10

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1 Introduction

1.1 Overview

- 1.1.1. The Applicant's Response to the Written Representations has been prepared in support of the examination phase for the proposed Gatwick Northern Runway Project (NRP, or Project). The Application was made by Gatwick Airport Limited (the Applicant) to the Secretary of State pursuant to Section 37 of the Planning Act 2008.
- 1.1.2. 127 Written Representations have been received and published, some of which include additional information provided as appendices. The Applicant has reviewed all submissions. This document has been prepared to provide a response to the Written Representations submitted at Deadline 1.
- 1.1.3. The Applicant is aware that it has multiple opportunities to set out its view on relevant and important issues in response to questions from the Examining Authority, participation at hearings and submission of other documents etc. Therefore, the Applicant considers that there would be little benefit in this document setting out at length matters which are already set out elsewhere.
- 1.1.4. Accordingly, this document does not seek to respond comprehensively to every element of the Written Representations but rather to focus on the principal points cited by the Interested Parties and where the Applicant considers the Examining Authority (and others) would benefit from the Applicant's response to clarify or correct any of the submissions made in the written representations. Silence on an issue, therefore, should not be interpreted as agreement – but instead a recognition of the approach taken by the Applicant in this document.
- 1.1.5. Where elements of the Written Representations have already been addressed within the DCO Application or in material already submitted to the examination (for example, the Relevant Representations Report, Statements of Common Ground or submissions following hearings), this document does not repeat such responses, but rather summarises them at a high level and provides signposting to where that information can be found.

2 Abinger Parish Council

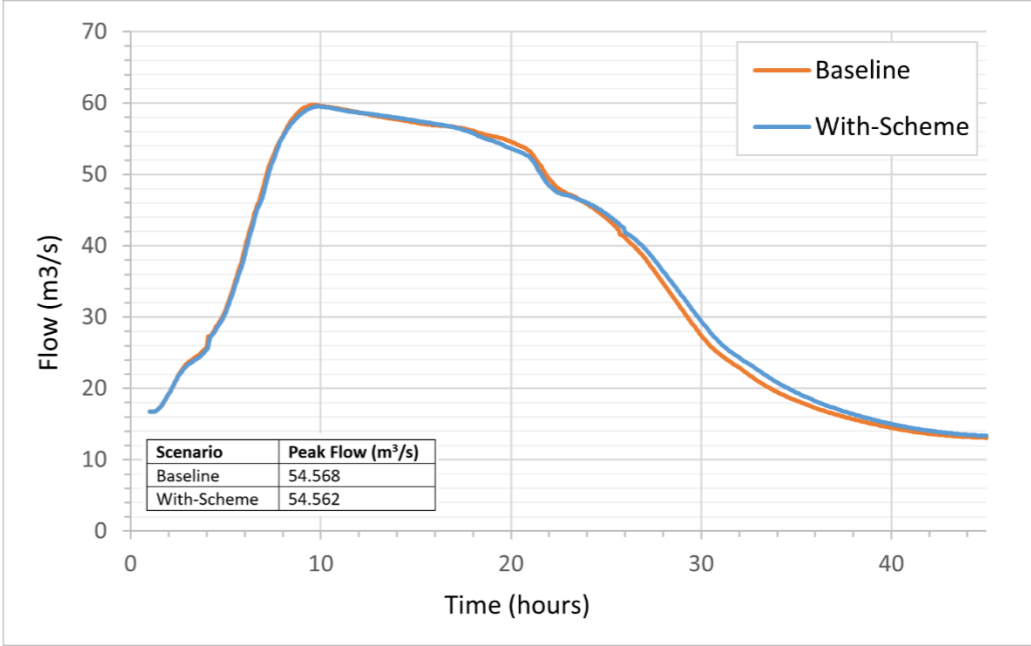
2.1.1. Table 2.1 sets out the Applicant's response to the matters raised in the Written Representation from Abinger Parish Council [\[REP1-108\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 2.1 Response to Written Representation from Abinger Parish Council

Topic	Matter Raised	Applicant's Response
Surface Transport	<p>The A25 is already a busy road as an artery between east and west. The M25 is subject to frequent closures or problems, and the A25 is an approved diversionary route which increases traffic through the villages to a very high level. The A25 is frequently slow due to normal traffic volumes. Many motorists, frustrated by the frequent delays on the M25/A25 will also take short cuts along country lanes through the rural areas via Abinger and Ockley to the villages of Leigh and Charlwood to the airport. The infrastructure in this area and current state of the roads cannot sustain further increases in traffic. Most recently, there have been serious gas leaks on the A25 and water leaks on Leith Hill Road leading to prolonged road closures. Gatwick's proposal for a new runway does not allocate any funds to handle the increased traffic flow on our Parish's rural roads, doubling passenger numbers and hence road use. Gatwick night flights have been steadily increasing since 2014, and while diminished during the pandemic, they are now back at 2019 levels. It is understood that a further increase of 70% is forecast by GAL. This also applies to freight flights and my understanding is that the present pattern of flights is set to continue for a further three years. All this extra activity will result in additional traffic on our local roads during an otherwise quiet period. The North Downs railway runs through the north side of the A25 through Dorking with connections to Gatwick. Again, there has been no allocation for additional rail services on an already busy single line. Any increase in rail traffic would be detrimental in terms of noise and effect on the environment. Increase in cargo at this airport can only result in significant increase in white van movements day and night plus the inward movements of sustainable aviation fuel as there is a lack of infrastructure at Gatwick to have this piped into the airport.</p>	<p>The Applicant has responded to Abinger Parish Council's concerns regarding traffic and transport at Section 3.2 of the Relevant Representations Report [REP1-048]. This sets out the comprehensive strategic modelling has been undertaken which includes the area covered by Abinger Parish Council.</p> <p>Diagram 12.3.2 of the Transport Assessment [AS-079] shows that a significant majority of airport-related traffic will be on the strategic road network. The modelling work takes into account journey times by different road routes and considers any potential displacement of traffic that may occur as a result of congestion.</p> <p>On night flights, it should be noted that the growth in Air Traffic Movements (ATMs) is limited to the day time period between 06:00 and 23:00. No additional flights are planned in the core night period due to the night restrictions. Any additional traffic associated with flights departing after 06:00 is taken into account in the transport modelling. The forecasted increase in cargo is related to cargo in the holds of passenger flights rather than dedicated freight flights.</p> <p>On the North Downs line, Section 9.4 of the Transport Assessment [AS-079] sets out the committed improvements included in the future baseline. This includes an increase of an additional train per hour on the North Downs Line by Great Western Railway, which came into operation in December 2023 and to which the Applicant made a contribution to support its early introduction. The assessment in Section 9 of the Transport Assessment [AS-079] also shows that the Project would not lead to a need for additional capacity on the North Downs Line.</p>
Air Noise	<p>Abinger Parish already experiences aircraft noise/pollution from flight departures and arrivals from both Gatwick and from helicopter and light aircraft traffic flying the east/west corridor over Abinger Hammer, Abinger Common, part of Holmbury St. Mary, Forest Green, Walliswood and Oakwood Hill.</p>	<p>The Applicant has responded to Abinger Parish Council's concerns regarding air noise at Section 3.2 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<p>Departing aircraft from Gatwick frequently overfly all the settlements in the Parish but are particularly bad over Abinger Common, Walliswood and Okewood Hill. During easterly departures on Route 3, take-offs over Abinger Common consistently fly below 3,000 feet, well below CAA regulations. These PRNAV routes are highly concentrated, which means that doubling the number of flights would make an already insufferable situation completely unbearable for residents already underneath low-flying aircraft. Plane movements are reported to double, so every minute would become every 30 seconds. See an example enclosed an Easyjet plane flying at 2,722ft. Coupled with the fact that Abinger Common is already 800ft above sea level this means the flights over the houses are actually at 1,922ft in reality. We would push for FASIS South routes to be redesigned to raise the height limit of Route 3 to be 4500ft, planes taking off steeper to 4000ft before being vectored off to their final destination sooner than Leith Hill. Walliswood and Okewood likewise already experience low-flying departures and arrivals, again doubling these numbers is inconceivable for parishioners living on or around satellite-guided flight paths severely diminishing house values worthless and making their gardens 'no-go zones'. Already, based on the proposal alone, mortgage companies are refusing mortgages to homes close to the airport; this will also affect homes on these further-concentrated flight paths. While people may be able to insulate their houses against some of the noise effects, it is impossible to apply this notion to the enjoyment of their gardens and outside space during the daylight hours. This also can require windows to be shut whatever the overnight temperature. Night flights are particularly intrusive and the debilitating effect of disturbed sleep on health and welfare is well documented.</p>	<p>Air noise is assessed for an average summer day. ES Chapter 14: Noise and Vibration [APP-039] notes the number of flights in a 16 hour day would increase by 19% in the worst impacted year and would increase by 10% for an average summer night (see ES Chapter 14: Noise and Vibration [APP-039], Table 14.7.1). ES Chapter 14 provides a full assessment of air noise impacts in this area and concludes the effects will not be significant.</p> <p>Ground height is taken into account in the noise modelling used to assess noise impacts from the Project, see para 2.48 of Environmental Research and Consultancy Department (ERCD) Report 2002: Noise Exposure Contours for Gatwick Airport 2019 as referred to in paragraph 2.1.1 of ES Appendix 14.9.2 Air Noise Modelling [APP-172].</p> <p>With regards to sound insulation, the ES Appendix 14.9.10: Noise Insulation Scheme [APP-180] for the Project includes acoustic ventilators specifically to allow windows to remain closed in warmer weather including at night so as to address concerns over sleep disturbance.</p>
<p>Flooding and Water Quality</p>	<p>The plans for further resurfacing will have an adverse effect on wildlife in terms of oil runoff pollution and flooding for the Mole River and wider region.</p>	<p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p>

Topic	Matter Raised	Applicant's Response
		<p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example, the hydrograph included as</p>

Topic	Matter Raised	Applicant's Response
		<p>Figure 2.1 below demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p>  <p>Figure 2.1: Flow at the downstream boundary in the 1% AEP + 40% CC 12-hour event.</p>
Greenhouse Gases	<p>Abinger Parish Council encourages the Parish settlements to adopt 'green' policies to avert the effects of climate change. We are also aware that the river Mole is subject to pollution. Any further pollution would endanger these policies and the wildlife. This area as stated is one of outstanding natural beauty, and a further expansion of the airport encouraging road and air traffic will potentially increase CO2 emissions and pollution to an unacceptable environmental level. This would also apply to the construction period of the airport facilities when increased traffic would be passing through the area. Several questions have been left unanswered such as - Where will the waste be transported to from the waste sorting site?</p>	<p>The Applicant has responded to Abinger Parish Council's concerns regarding greenhouse gases and climate change at Section 3.2 of the Relevant Representations Report [REP1-048].</p> <p>Waste from the new CARE facility will be transported by registered waste carriers to waste management facilities that hold the required environmental permit and planning consent. Waste will be managed in accordance with the waste hierarchy as part of a sustainable waste management approach. The waste management facilities used by the Airport are kept under regular review.</p>
Socio-Economics	<p>Abinger Parish Council is aware of the New Economics Forum's economic forecasts questioning the accuracy of forecasts about the future of air travel, which appears to be principally commercially driven, and no account has been taken of the social and environmental costs to this area and to those of the outlying villages around Gatwick. Business travel has dropped off with the advent of video calling, the proposed jobs are non-existent as more roles are automated and the jobs that have remained have been lower paid than prior to Covid 19. The economic case for expansion is not realistic and the proposed</p>	<p>A full response to the New Economics Foundation's submission is set out in Appendix D: Response to New Economics Foundation Written Representation (Doc Ref. 10.14). The Applicant is confident in its forecasts and the economic appraisal that was undertaken in line with the DfT's Transport Appraisal Guidance Needs Case Appendix 1: National Economic Impact Assessment [APP-251]. This takes account of the social and environmental costs and shows a significant net benefit. Business travel fell during the Covid-19</p>

Topic	Matter Raised	Applicant's Response
	benefits are not there; if anything, additional cheap flights are an economic drain away from the UK and the population spends their holiday money elsewhere. There is currently a lack of existing workforce to fill current job vacancies let alone the supposed 14,000 job vacancies Gatwick says it will create.	<p>pandemic but is returning. Government policy strongly supports both inbound and outbound tourism.</p> <p>The estimate of new jobs on the airport set out in the application takes account of productivity improvements and includes jobs at a range of skill levels as set out in Table A1.1.1 of the ES Appendix 4.3.1: Forecast Data Book [APP-075].</p> <p>The 14,000 workers will be in jobs spread across a wide area – the six Local Authorities (Croydon, East and West Sussex, Surrey, Kent and Brighton). An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p>

3 Airport Industrial Property Unit Trust

3.1.1. Table 3.1 sets out the Applicant's response to the matters raised in the Written Representation from the Airport Industrial Property Unit Trust [\[REP1-165\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 3.1 Response to Written Representation from Airport Industrial Property Unit Trust

Topic	Matter Raised	Applicant's Response
Land Interest	AIPUT has for some considerable time sought clarification of the proposals affecting its land interests and justification for GAL's proposals to compulsorily acquire its land and rights in land. AIPUT's relevant representation submitted in October 2023 identified that AIPUT's asset, 'Viking House' (Book of Reference Plot IDs E/36, 6/733, 6/734, 6/736, 6/737 and 6/740) located on the southern airport boundary was subject to Cat 1 and Cat 2 Land Interests. Plots 6/733, 6/734, 6/736, 6/737 and 6/740 were identified as being subject to powers of compulsory acquisition or temporary possession, as well as powers to override easements and other rights. AIPUT requested more information as to why these parts of Viking House are identified for permanent acquisition, and rationale for the nature and extent of rights sought (as opposed to temporary acquisition or a private easement agreement). As such, AIPUT objected to the permanent acquisition of part of the Viking House site on the basis that the proposed powers have not been adequately justified in accordance with section 122 of the PA 2008 and relevant guidance. AIPUT remains of the view that the compulsory acquisition proposals affecting Viking House have not been adequately justified and explained in the DCO application or since. Neither AIGPL nor AINL are identified in the Land Rights Tracker submitted by GAL on 9 February 2024 [PDLA-010] nor, as outlined	<p>In respect of Airport Industrial Property Unit Trust (AIPUT) requesting more information as to why these parts of Viking House are identified for permanent acquisition, the Applicant has sought to provide additional clarification through private discussions with AIPUT regarding the Project proposals and its potential impact on AIPUT's assets. As explained in Section 4.7 of the Relevant Representations Report [REP1-048], the Applicant has categorised the land acquisition proportionately to ensure that the Applicant has the ability to acquire the land required to design, construct, and operate the Project (subject to detailed design), the justification of the inclusion of Plots 6/733, 6/734, 6/736, 6/737 and 6/740 is for the project to undertake minor works, including protective works, access or utility diversions for third party assets.</p> <p>Only land confirmed as being required permanently (subject to detailed design) is to be acquired by the Applicant, and the Applicant continues to negotiate terms for a voluntary agreement.</p> <p>The Land Rights Tracker was requested by the Examining Authority to capture the data that was within the 'Justification Table and Status of Engagement with Landowners' Statement of Reasons [AS-008] Annex A and the 'Status of</p>

Topic	Matter Raised	Applicant's Response
	<p>earlier, were they consulted during the pre-application stage as a landowner within s.42(1)(d) of the PA 2008. AIPUT is concerned the lack of clarity during preapplication consultation about what was proposed at the Viking House site and how its land interests were affected, meant that it was not able to respond meaningfully to the consultation and influence the proposals. AIPUT therefore wish to reiterate their objection to the permanent acquisition of part of the Viking House site on the basis that the proposed powers have not been adequately justified in accordance with section 122 of the PA 2008 and relevant guidance. GAL have still not provided adequate justification as to why temporary possession or a lesser type of right is not sufficient. Furthermore, AIPUT seeks assurance that access from the Viking House site to Perimeter Road South and from off airport locations, will be maintained at all times for the purposes of access to the terminals and cargo areas. AIPUT also opposes compulsory acquisition of its existing on-airport access rights across several hundred plots, as set out in the Book of Reference. No rationale for this has been advanced. Denying existing and future tenants of its property continued access to both terminal buildings via the internal airport roads will materially impact the ability of that tenant to provide services to the airport and cause further traffic to use the external roads for the wider area. This will compound and worsen the traffic concerns already set out below under the 'Transport and Traffic' subheading. It will also lead to increased costs for AIPUT's tenant and likely higher costs experienced by airlines and other airport users and operators. In relation to Gatwick Gate, AIPUT also repeats the request for more detail as to the nature and extent of work no. 42, located along Perimeter Road South, including confirmation of any changes to airside access and control posts. Further details on the extent to which existing accesses and transport networks will be affected by the proposed works are requested, as well as confirmation that Old Brighton Road/ Perimeter Road South roundabout and access will be maintained. AIPUT request this information in order to assess any potential impacts on their asset. AIPUT intend to continue their engagement with GAL. Heads of terms have been received on 1 March 2024 and are still being reviewed by AIPUT</p>	<p>Engagement with Statutory Undertakers' Statement of Reasons [AS-008] Annex B at submission of the Application and then to be updated throughout Examination. The form and content of the Land Rights Tracker was submitted to the ExA for approval prior to submission to the Examination.</p> <p>The Applicant confirms that Section 42 notices were issued to both Airport Industrial GP Limited and Airport Industrial Nominees Limited in September 2021 as part of the pre-application consultation.</p> <p>In respect of AIPUT's opposition to the compulsory acquisition of its existing on-airport access rights across plots within the Book of Reference, the Applicant has a vested interest in ensuring that the airport roads and associated infrastructure are maintained into the future and that any impacts arising from the Project are mitigated as far as possible, and the Applicant does not intend to prevent access to terminals via internal roads or otherwise. The Applicant is committed to working with AIPUT to ensure these outcomes.</p> <p>The Applicant can confirm that the nature and extent of Works no. 42 includes works to establish a habitat enhancement area along Perimeter Road East and Perimeter Road South including short scrub hedge and habitat suitable for bats along Crawter's Brook and construct a weir and a fish pass. There is no proposal to change the airside access.</p> <p>The Applicant will continue to progress discussions with AIPUT and is waiting for feedback on the Heads of Terms issued on 1st March 2024, and has a meeting with AIPUT on 19th April 2024.</p>
Traffic and Transport	<p>AIPUT previously commented on the permanent parking provision proposals in the Summer 2022 Consultation and raised further concerns on the amended Proposals in the submitted DCO application as part of their Relevant Representation. AIPUT understands from the figures provided in both the Design and Access Statement and the Planning Statement (Document Ref. 7.1, paragraph 4.5.79) that there will be a net decrease of 425 parking spaces</p>	<p>Due to the relocation of the existing car park used for Purple Parking (air passenger parking operated by a third party) to Car Park X, there would be a reduction of 425 spaces in the on-airport capacity of Car Park X, which would be re-provided through decking of North Terminal Long Stay.</p>

Topic	Matter Raised	Applicant's Response
	<p>between Purple Parking and Car Park X. AIPUT requests confirmation that this figure is correct. No detail has been provided on the split of staff parking or passenger parking at the proposed Car Park X location. The application proposes that staff and passengers would use separate accesses, via Perimeter Road South and Charlwood Road, respectively, AIPUT would request forecasts for vehicle movements egressing from Car Park X via these accesses. More specifically, AIPUT would request confirmation that trip generations from the increased size of car park X is not detrimental to operations at Viking House and Gatwick Gate with and/ or without the proposed access from Charlwood Road. Moreover, it is unclear whether 'staff parking' would entail airline employees or airport associated services (or both). AIPUT would request more information on this as well. At this point AIPUT has a concern that operations at Viking House could be detrimentally affected by increased road traffic from these elements of the Project. These concerns and other overarching traffic implications are further discussed below.</p>	<p>The proposal is for users of the relocated Purple Parking car park at Car Park X to use a dedicated access from Charlwood Road, separate to the remaining area of Car Park X, which will continue to be accessed from Perimeter Road South. This means that only airport employees (either staff or valet drivers) will require access to car parking off Perimeter Road South.</p> <p>Car Park X operated as a staff car park prior to the Covid pandemic but more recently is providing valet storage space, with staff parking provided elsewhere on-airport. In all scenarios for the use of Car Park X, traffic flows along Perimeter Road South are not forecast to increase from pre-Covid levels. This means there will be no traffic-related impact on the accessibility or operations of premises along Perimeter Road South including Viking House and Gatwick Gate.</p>
Traffic and Transport	<p>As explained in the 'recap' section AIPUT have commented previously on ensuring the free flow of traffic within and around the Airport boundary particularly in relation to minimising traffic impacts. AIPUT restate the practical requirements for public access to and from Perimeter Road South to be maintained or improved as part of the proposals, for the purpose of efficiently accessing operational areas within the airport. Following the submission of the DCO, AIPUT commented on the lack of sufficient transport modelling. These are directly relevant to AIPUT who possess access rights around the Gatwick Airport ('the airport') relevant to and necessary for maintaining its airline catering and logistics uses which are time critical for airport operations and airline departures. AIPUT have appointed a transport consultant John Russell CMILT MIHT to provide expert appraisal of this technical element of the proposals. This consultant has initially reported concerns as follows. 1. There is insufficient evidence to allow a conclusion that the traffic modelling is acceptable. The Applicant is relying on "key stakeholders" having accepted the modelling. This is not acceptable; PINS and IPs should be provided with the evidence. This is particularly given the reliance on multiple models and hence a significantly increased risk of significant errors creeping in. 2. The traffic modelling considers a neutral day without having regard to seasonality. At many times of the year, uplifts in traffic travelling to and from the airport can be expected. It has not been possible to identify how seasonality has been included into the production of annualised daily traffic forecasts for EIA disciplines. Likewise it has not been possible to identify how data from one</p>	<p>The approach to transport modelling is in line with the DfT's Transport Appraisal Guidance, which provides an industry-wide approach to developing, calibrating and validating transport models and to their use for forecasting future scenarios. The methodology and technical information related to the models has been reviewed by National Highways, Network Rail and the Local Transport Authorities through a number of stakeholder engagement sessions from 2019 which are detailed in section 5.2 of the Transport Assessment [AS-079].</p> <p>On the query regarding the calculation of the annualised values for the relevant environmental disciplines this process is documented in section 6.9 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]. This explains how the process accounts for the different seasonality patterns for background and airport related traffic within the factors used. The traffic modelling used in the assessment in ES Chapter 12: Traffic and Transport [AS-076] is based on conditions on a typical June day and therefore takes account of the higher levels of activity that are typically seen at the Airport in the summer months. A submission has been made at deadline 2 which explains the approach of using June conditions as the basis for transport modelling see Appendix B of The Applicant's Response to Actions - ISHs 2-5 [REP2-005].</p> <p>Regarding the assumptions in relation to Covid, DfT guidance has been used to implement changes to background demand in the transport modelling which is detailed in Accounting for Covid in Transport Modelling [AS-121]. However, airport demand has been treated differently given the specific nature of the land</p>

Topic	Matter Raised	Applicant's Response
	<p>hour traffic models has been manipulated to arrive at daily flows for use by EIA disciplines. These would cause underreporting of volumes. 3. The approach taken to considering the effects of COVID – such as in relation to peak hour commuter patterns - follows general guidance but it is questionable whether this is suited to this relatively unique land use in relation to which traffic patterns are unlikely to have similar post-COVID responses. These would cause underreporting of traffic volumes. 4. The detailed junction modelling outputs show that performance of mitigation schemes is on the margin with very little capacity to absorb any fluctuation in traffic volumes. In addition, the mitigation schemes seem to comprise multiple narrow lanes and tight radii which tend to either be poorly used by motorists or are simply too narrow. In light of the above, if the lack of sufficient modelling is left unchecked, there is likely to be detrimental impacts to the road networks surrounding Viking House, Gatwick Gate and Fleming Business Centre, including:</p> <ol style="list-style-type: none"> 1. Higher traffic volumes at the Lowfield Heath and Gatwick Road roundabouts than predicted by the model forecasts; 2. Due to forecast queues and delays, non-airport traffic that is forecast to divert from London Road (including the Lowfield Heath and Gatwick Road roundabouts) will fail to do so due to the Scheme in place, thereby increasing the volume of traffic on this route; and 3. Non-airport traffic that would otherwise route via the North and South terminal roundabouts diverting along London Road (including the Lowfield Heath and Gatwick Road roundabouts) thereby increasing the volume of traffic on this route. This is explained further in Appendix 1 (Transport Appraisal) of this submission. Importantly, the points made here are based on the continued ability of Viking House tenants to access the terminal areas using their existing access rights, compulsory acquisition of which AIPUT opposes. In conclusion, AIPUT has sought to engage with GAL during the pre-application process and the pre-examination phase to discuss its concerns and to gain a better understanding of the proposals for the Project and how they affect AIPUT's land and assets. AIPUT is encouraged that draft Heads of Terms for an agreement with GAL have now been provided and hopes that this will enable more meaningful engagement as the examination proceeds. We will be happy to answer specific ExA questions on any of the above points. 	<p>use and therefore the assumptions remain the same as the application, see 4.4.2 of Accounting for Covid in Transport Modelling [AS-121].</p> <p>The highway works which form part of the Project have been designed in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and have been the subject of extensive discussion with National Highways, Surrey County Council and West Sussex County Council. These discussions have included matters related to design, construction, operation and maintenance. Where it would be necessary to depart from the requirements of DMRB, those departures have been identified and preliminary agreement sought to them from the relevant highway authorities.</p> <p>Comprehensive strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the Transport Assessment [AS-079]) and its accompanying appendices, notably Assessment Annex B: Strategic Transport Modelling Report [APP-260] and Assessment Annex C: VISSIM Forecasting Report [APP-261]. The assessment methodology identifies the degree of impact which is expected at all locations in the study area, based on the criteria set out in paragraphs 12.4.10 to 12.4.14 and Table 12.4.6 of ES Chapter 12: Traffic and Transport [AS-076]. ES Chapter 12: Traffic and Transport [AS-076] shows that both the Gatwick Road and Lowfield Heath roundabouts form part of the study area. The highway model allows for the potential for traffic reassignment between available routes, based on the degree of delay experienced on each route, and therefore takes account of re-routing that might occur as a result of any congestion that is forecast to occur on the highway network. The forecasts of traffic conditions in the vicinity of Gatwick Road and Lowfield Heath roundabouts are therefore considered to be robust. Based on the modelling work and assessment presented in ES Chapter 12: Traffic and Transport [AS-076] and the Transport Assessment [AS-079], the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works surface access improvement works as part of the Project.</p>
Land Rights Tracker	AIPUT notes that neither AIGPL nor AINL are listed as an 'affected person' in the Land Rights Tracker submitted by GAL on 9 February 2024 [PDLA-010].	The Land Rights Tracker [PDLA-010] was requested by the Examining Authority to capture the data that was within the 'Justification Table and Status of Engagement

Topic	Matter Raised	Applicant's Response
	AIPUT does not understand why they are omitted from the 'Justification Table and Status of Engagement with Landowners', (Appendix A to the Statement of Reasons [AS-008] and similarly from the Land Rights Tracker. As affected landowners, AIPUT should have been consulted s during the pre-application stage as section 42 parties (which did not occur, and which we expand in in our Written Representation above) and the status of engagement with AIPUT should be covered in the Statement of Reasons and the Land Rights Tracker.	with Landowners' Statement of Reasons [AS-008] Appendix A and the 'Status of Engagement with Statutory Undertakers' Statement of Reasons [AS-008] Appendix B at submission of the Application and then to be updated throughout Examination. These appendices report on negotiations with those parties who have a freehold interest in the Order Land and parties who are statutory undertakers or Crown bodies. As neither AIGPL nor AINL have freehold ownership of plots within the Order Land they have not been included on the Land Rights Tracker. The Applicant confirms that Section 42 notices were issued to both Airport Industrial GP Limited and Airport Industrial Nominees Limited in September 2021.

4 Alice Myers on behalf of other Interested Parties

4.1.1. Table 4.1 sets out the Applicant's response to the matters raised in the Written Representation from Alice Meyers on behalf of other Interested Parties [REP1-109]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 4.1 Response to Written Representation from Alice Meyers

Topic	Matter Raised	Applicant's Response
Noise	Noise pollution reducing our quality of life and damaging the value of our property.	The Applicant has responded to general concerns regarding noise associated with the Project within Section 4.22 and impacts on house prices within Section 4.23 of its Relevant Representations Report [REP1-048].
Ecology	Environmental pollution damaging local wildlife and reducing green space.	The Applicant has responded to general concerns regarding impacts on wildlife and open space at Section 4.13 and Section 4.2 respectively of its Relevant Representations Report [REP1-048].
Socio-economic: Impact on local resources	Intolerable pressures placed on local resources including roads and hospitals. East Surrey hospital already has one of the lowest critical care beds per hundred thousand population in the entire UK (<2 beds per 100,000, national average 7.6 beds per 100,000). The hospital, built for a population of fewer than 250,000 now serving a population of over 770,000 people, simply does not have the infrastructure to support the increased workload which will result from an additional runway. This will inevitably further reduce the ability of the local population to access healthcare at the point of need.	The Applicant has responded to concerns raised regarding the impact of the Project on local housing, infrastructure and services at Section 4.25 of its Relevant Representations Report [REP1-048]. ES Chapter 17: Socio-Economic [APP-042] provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services).

5 Andrew Braddon

5.1.1. Table 5.1 sets out the Applicant's response to the matters raised in the Written Representation from Andrew Braddon [REP1-110]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 5.1 Response to Written Representation from Andrew Braddon

Topic	Matter Raised	Applicant's Response
General	Further to my recent communications I remain, as do my neighbours in Penshurst and beyond, wholeheartedly opposed to this ludicrous northern runway proposal for the reasons previously set out. This runway was originally created as a safety measure and it makes no sense to change this concept. It would be highly dangerous and other than making a huge profit for the investors, it makes no sense whatsoever. I therefore must repeat that I object in the strongest possible terms. Please withdraw this proposal with immediate effect with the enlargement of the Gatwick airport facilities and the runways.	The Applicant has responded to safety concerns raised by Interested Parties as a result of the repurposing of the emergency runway at Section 4.20 of its Relevant Representations Report [REP1-048] . An emergency or stand-by runway is not a CAA requirement and many other airports do not have one. Should circumstances arise where an aircraft could not use the runway(s) at Gatwick Airport, for whatever reason, it would be diverted to an alternative airport.

6 Angela Tyson-Davies

6.1.1. Table 6.1 sets out the Applicant's response to the matters raised in the Written Representation from Angela Tyson-Davies [\[REP1-112\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 6.1 Response to Written Representation from Angela Tyson-Davies

Topic	Matter Raised	Applicant's Response
Forecasting and Need	We have lived in the local area all our lives and for the last 12 years in our forever home in Charlwood. We have always lived in harmony with the airport, without it we would probably wouldn't have been able to afford the area despite it being our childhood area. Having spent her entire childhood watching planes our daughter is now hoping to train us a pilot (did you know there is a shortage of pilots, predicted to get worse over the next 20yrs) so we are by no means anti Gatwick just anti unnecessary expansion just for the financial benefits of the owners. It will be an expansion, there is no northern runway just an emergency taxi way which for some reason is no longer needed! This means a new runway ' will ' be built and I guess it will then need a new terminal to go with it, oh and perhaps it might also need an emergency runway! Mass expansion destroying the local area for what! Gatwick is a holiday airport. In previous expansion events, I have listened to pilots telling us their airlines don't want to fly from Gatwick and neither do they. Only about a year ago waiting at an airport for our return flight home I asked a couple of Virgin pilots when Virgin airlines would be returning to Gatwick, they both replied ' never we hope ' they hate flying from Gatwick, so how about you ask the airlines if its needed.	The Applicant has responded to Interested Parties' concerns regarding the need for the Project at Section 4.21 of its Relevant Representations Report [REP1-048] . This includes a response to concerns that Gatwick Airport is just a holiday airport which does not justify expansion - compared to other airports, Gatwick supports the widest mix of airlines and market segments across the London aviation market. It successfully caters to full-service carriers, low-cost carriers, charter airlines, regional carriers as well as a wide range of markets including long haul.
Air Quality	London has now got ULEZ, you allow Gatwick to expand then do we know what that is going to do to our air? My daughter has a friend who lives locally who missed weeks of school . We allow Gatwick to expand and in the blink of	The Applicant has responded to concerns that air quality will worsen as a result of the NRP at Section 4.3 of its Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	<p>an eye we will be told we need a ULEZ locally and we the locals will be paying for that. Our country lanes that provide east to west routes to the airport are already falling apart, will Gatwick pay or will we! The villages are struggling to slow traffic through them, if 20mph are introduced then our country lanes between the villages will become race tracks to get to Gatwick.</p>	<p>The Applicant has responded thematically to comments made within relevant representations on concerns regarding vehicles 'rat-running' through the local area and villages at Section 4.26 of the Relevant Representations Report [REP1-048].</p>
Noise and Vibration	<p>We can deal with the current noise pollution from Gatwick, there are times in the summer when it's too hot to sleep we have to go to bed with the windows shut because early morning flights will wake us, as I said we live with Gatwick as it is but to expand would just destroy so many peoples quality of lives for nothing but one companies gain.</p>	<p>As reported in the ES Chapter 14: Noise and Vibration [APP-039] the Charlwood area is predicted to experience increases in noise of Leq 16 hr 1 to 2 dB in the daytime, and less at night. These are low increases in noise and because noise levels in this area are well below SOAEL, they are assessed to result in minor adverse and not significant effects. The majority of the residential properties in these areas would be eligible for the new Outer Zone NIS which includes acoustic ventilators which will allow windows to remain closed in warmer weather.</p>
Socio-Economics	<p>The employment argument is flawed, just look on indeed and see the number of jobs Gatwick is already trying to fill!</p>	<p>Gatwick Airport is a major driver of the local economy and a significant generator of jobs. At any given point in time there will be jobs that the Applicant and other on-airport business are trying to fill. These jobs are mainly filled by local people. The NRP will create significantly more jobs (over 3,000 on-airport) that will also benefit local residents.</p>
Greenhouse Gases	<p>We are a country who is supposedly looking at our carbon footprint, do we need more flights, do we hear people complaining how long they are having to wait to get a flight to where they wish to go on holiday? I honestly think there is no need now or in the future to have more flights to/from Gatwick or indeed anywhere in our county.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding Greenhouse Gases and the consideration of climate policy Gatwick at Section 4.16 and Section 4.21, respectively, of its Relevant Representations Report [REP1-048].</p> <p>The Applicant has set out its case as to why it considers that increased capacity for flights is necessary at Gatwick in its Needs Case [APP-250] submitted with the application. As that document explains, government policy supports the principle of the growth of aviation. The fact that there may be delays to travel results from constraints on existing capacity and a consequent lack of resilience. The NRP can help to address both the need for more aviation capacity and the constraints currently affecting operations at Gatwick Airport.</p>

7 Anne Upton

7.1.1. Table 7.1 sets out the Applicant's response to the matters raised in the Written Representation from Anne Upton [REP1-113]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 7.1 Response to Written Representation from Anne Upton

Topic	Matter Raised	Applicant's Response
Design	I object to this application. I think this application is being put through by the back door. The Emergency Runway is too close to the original runway, so it won't be a tweak, but in fact another runway will have to be built. There is no mention of having an emergency runway, so does that mean an emergency runway would then have to be built as well?	<p>The Applicant has responded thematically to comments on the Project's design, at Section 4.11 of its Relevant Representations Report [REP1-048]. The Applicant has also responded to safety concerns raised by Interested Parties as a result of the repurposing of the emergency runway at Section 4.20 of its Relevant Representations Report [REP1-048].</p> <p>An emergency or stand-by runway is not a CAA requirement and many other airports do not have one. Should circumstances arise where an aircraft could not use the runway(s) at Gatwick Airport, for whatever reason, it would be diverted to an alternative airport.</p>
Socio-economics and job opportunities	As for 14,000 new jobs, with technology advancing as it is, I don't believe that number is correct. However, the present vacancies are not being filled.	<p>The estimate of new jobs on the airport set out in the application takes account of productivity improvements and includes jobs at a range of skill levels as set out in Table A1.1.1 of the ES Appendix 4.3.1: Forecast Data Book [APP-075].</p> <p>The 14,000 workers will be in jobs spread across a wide area – the six Local Authorities (Croydon, East and West Sussex, Surrey, Kent and Brighton). An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p> <p>The Applicant has responded thematically to comments made within relevant representations regarding socio-economics and creation of job opportunities at Section 4.25 of its Relevant Representations Report [REP1-048].</p>
Traffic and Transport	The M23, M25 and local roads are already heavily congested and local villages and towns suffer from Airport Parking on the streets.	The Applicant has responded thematically to comments made within relevant representations regarding congestion and parking, at Section 4.26 of its Relevant Representations Report [REP1-048].
Greenhouse Gases and Policy	If the Government aren't concerned with their Net Zero Policy or Climate Change when it comes to increasing the volume of passengers, noise, congestion and pollution maybe an existing Northern Airport might benefit better from 14,000 new jobs	The Applicant has responded thematically to comments made within relevant representations regarding Greenhouse Gases and the consideration of climate policy Gatwick, at Section 4.16 and Section 4.21, respectively, of its Relevant Representations Report [REP1-048].

8 Aviation Environment Federation (AEF)

8.1.1. Table 8.1 sets out the Applicant's response to the matters raised in the Written Representation from the Aviation Environment Federation (AEF) [REP1-114]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 8.1 Response to Written Representation from AEF

Topic	Matter Raised	Applicant's Response
Greenhouse Gases and Policy	<p>The Panel has both the right and – we would argue – the duty, to make its own assessment of the likely compatibility of this proposal with the UK's legal commitments on climate change. The Applicant's assumption is that the Government has ultimate responsibility to address the greenhouse gas emissions from aircraft as set out in its approach to Jet Zero. No part of Government policy states that climate considerations should be excluded from the planning process for airport expansion, or that they should be given no weight, and the airport capacity assumptions included in the Government's Jet Zero model do not – it is made clear - pre-judge the outcome of any future planning applications.</p> <p>All statements of Government support for airport expansion are qualified with wording about justification and sustainability to be judged by the relevant planning authority. We therefore highlight here what we consider to be relevant evidence on the climate impact of this proposal to be taken into account in the planning decision-making process. We further argue that if the scheme is given approval, it must come with enforceable conditions that greenhouse gas emissions will be capped, at least in line with the emissions forecast presented by the Applicant.</p> <p>This proposal would generate a larger increase in both passengers and emissions than any airport expansion proposal since the passing of net zero legislation in the UK, so the issue requires some close attention.</p>	<p>The Applicant has responded to AEF's assertions regarding the considerations of climate policy at Section 3.5 of its Relevant Representations Report [REP1-048].</p> <p>It is not the Applicant's position that climate change considerations should be excluded from the decision-making process or given zero weight in the planning process for airport expansion. In fact, issues relating to climate change are addressed extensively in the submitted application documents.</p> <p>Rather than relying on assertion, however, the application documents rely on assessment and the detailed consideration of planning policy. The significance to be attached to the impacts of the NRP on climate change is assessed in detail in ES Chapter 16: Greenhouse Gases [APP-041] and the weight to be attached to those impacts is addressed at Section 8.7 the Planning Statement [APP-245].</p> <p>The analysis demonstrates that the emissions arising from the NRP project would not be so significant that the Project would have a material impact on the ability of Government to meet its carbon reduction targets.</p> <p>To a large extent, AEFs representations challenge government policy, rather than being specific to this application. In fact, the representations assert that "<i>the applicant is wrong to rely on the efficacy of current policy measures</i>" (Sections 1 and 6 of the representations) and assert that "<i>There is a high risk CO2 reductions relied upon will not be achieved due to the weaknesses in the government's approach to climate mitigation.</i>" (Section 5.1). The Applicant and this examination are obliged to accept and apply government policy, rather than to challenge it.</p>
Greenhouse Gases – Jet Zero	<p>The Applicant relies on the Government's "Jet Zero" approach - which comprises policy goals and a trajectory, illustrative modelling and possible areas for future policy - in its projections for the greenhouse gas emissions associated with the project. However, the risks associated with the Government's approach also pose a financial and environmental risk to the proposals for Gatwick expansion.</p> <p>The Climate Change Committee's 2023 Progress Report to Parliament characterised the Jet Zero Strategy as "high risk due to its reliance on nascent technology" (echoing a similar conclusion from Element Energy, in a report commissioned by AEF2). The CCC report argued that the expansion of airports permitted by the Government in recent years is "incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the</p>	<p>The Applicant has responded to AEF's concerns regarding the Jet Zero forecasts at Section 3.5 of its Relevant Representations Report [REP1-048].</p> <p>Whilst AEF asserts that the Applicant should not use the Government's "High Ambition" trajectory, it fails to acknowledge that this is the same trajectory used by Government in its Jet Zero Strategy and confirmed in Jet Zero – one year on. It is that trajectory which the Government has committed to monitor and enforce, and it therefore forms an entirely appropriate basis for the Applicant's forecasts when considering likely significant effects.</p> <p>As stated above, it is not for this examination to question government policy. That policy should be recognised in full, including the commitments made by the Government in the JZS and in the follow-on publication Jet Zero – One Year On.</p>

Topic	Matter Raised	Applicant's Response
	<p>Government's pathway and can accommodate this additional demand" and that "No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects."</p> <p>We recognise that the Government has the right to reject the CCC's advice and has recently published its response. As noted by the Applicant, however, the Secretary of State ultimately has responsibility for ensuring that climate change legislation is adhered to. The Applicant states in APP-041: <i>"An important element of Jet Zero is that the emissions trajectory for the aviation sector will be monitored on an annual basis whilst the Strategy itself will be reviewed every five years. This acknowledges that decarbonisation will rely on new technologies which require time to develop and test. However, the Strategy explains (for example, on page 10) that the Government will intervene with new measures if the sector is not meeting its emissions trajectory."</i></p> <p>It would seem to us that if the CCC is correct about the Government's strategy being unrealistic in its reliance on new fuels and technologies coming rapidly to the market, and if its modelling for airport expansion is therefore inappropriate, then the Government will in the near future need to act to rein in emissions by way of demand reduction. This should – at least – be recognised as a risk to the financial case being made for expansion at Gatwick (and at other airports). The downward revision of the level of demand forecasted by the Government from 70% to 50% within the space of a year (between the publication of the Jet Zero Strategy in July 2022 and of Jet Zero: One Year On in July 2023) illustrates how vulnerable these estimates are to change.</p>	<p>Those publications demonstrate that the Government is completely committed to achieve net zero and to a rigorous monitoring process to ensure that policies and measures can respond to uncertainties and developments to ensure that the trajectory to Jet Zero is met. As the Government explains in the Jet Zero Strategy:</p> <p><i>"If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UKs overall 2050 net zero target."</i> (page 10).</p> <p>The Jet Zero Strategy acknowledges that there is some uncertainty associated with the deployment of new technologies for example (JZS para. 1.8). It should be noted that initiatives, policy measures, and other efforts to decarbonise the aviation sector are largely outside the control of Gatwick Airport or the scope of the application for development consent. However, as the Jet Zero Strategy demonstrates, they represent committed targets in government policy and legislation and are relied upon as such. As the JZS explains, the changing nature of technology and markets is recognized. That is why the JZS commits to a detailed monitoring process and identifies a range of policy and market mechanisms for the Government to draw upon.</p>
Greenhouse Gases – Carbon budget	<p>The Government's climate change obligations are not confined to 2050: the Sixth Carbon Budget (2033-37) and the Government's interim target of a 78% reduction in emissions below 1990 levels by 2035 are also notable milestones. The emissions associated with this project during the 2030s should be examined closely given that GAL forecasts a higher trajectory for emissions in this decade (and for its cumulative emissions generally out to 2050) compared to the Government's Jet Zero strategy (see Diagram 16.9.3 in APP_041). In Jet Zero, emissions peak in 2019, and follow a reducing pathway to 2050. In contrast, the Applicant's emissions do not peak until 2032, and follow a less steep trajectory to 2050. As a result, Gatwick's emissions with the project represent a significantly bigger share of total UK aviation emissions in 2050 than they do in both 2030 and 2040.</p>	<p>The Applicant has responded to AEF's assertions regarding the considerations of climate policy at Section 3.5 of its Relevant Representations Report [REP1-048].</p> <p>It should not be expected that every airport will follow the same trajectory. The government's obligation and commitment is to manage the sector as a whole and primarily to manage airlines, rather than airports, rather than to micro manage each airport.</p> <p>It should be noted that Diagram 16.9.3 set out in Section 16.9 the ES Chapter 16 Greenhouse Gases [APP-041] compares the emissions from all GAL outward flights against the residual emissions from the Jet Zero Strategy as stated in Section 3.5 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<p>AEF opposes this application for a Development Consent Order (DCO) on the basis that it is likely to generate a significant increase in greenhouse gas emissions, and other climate impacts, that runs counter to the UK's net zero obligations. There is a high risk that the carbon dioxide (CO2) emissions reductions from aircraft, relied upon by Gatwick Airport Limited (GAL) in its forecasts, will not be achieved, particularly given the weaknesses in the Government's approach to climate mitigation.</p> <p>Current trends and available evidence suggest that emissions reductions in aviation will be difficult to deliver on time and at scale.</p>	<p>It is acknowledged that the modelled emissions for all outward flights peaks in 2032 – this is because additional consented flight capacity does not become fully utilised for some time following the completion of the Project.</p> <p>It should be noted, with reference to Diagram 16.9.3, that the <u>rate</u> of decrease from 2032 to 2050 is hard to interpret from the diagram. Residual emissions within the Jet Zero modelling reduce by 44% between 2032 and 2050. Table 5.3.1 of ES Appendix 16.9.4: Assessment of Aviation Greenhouse Gas Emissions [APP-194] show aviation emissions of 6.144 MtCO2e in 2032 falling to 3.476 MtCO2e in 2050 - a fall of 43%.</p> <p>As noted in its Relevant Representations Report [REP1-048] the impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
<p>Greenhouse Gases – Measures to achieve net zero</p>	<p>AEF's view is that the Applicant is wrong to rely on current policy measures alone to reduce emissions to net zero by 2050. The Jet Zero Strategy published in 2022 introduced few meaningful policy innovations yet its modelling assumptions have allowed the Applicant to halve its projection of additional CO2 emissions from this proposal compared to initial estimates. Many of the measures that would be required to achieve the Government's ambition for aviation are in fact uncertain (the future effectiveness of carbon pricing, the uptake of alternative aviation fuels and the rapid deployment of greenhouse gas removal technologies for example); others, such as the rate of commercialisation of more efficient aircraft, are beyond the Government's control. More detail on these issues is set out below.</p> <p>The emissions forecast from the Applicant has been based on the Government's 'High Ambition' trajectory for aviation in the Jet Zero Strategy. This includes modelling assumptions – on alternative fuels and more efficient aircraft – that are significantly more optimistic than earlier forecasts. Modelled emissions associated with the proposed Gatwick project are now, therefore, much lower than in previous modelling by the Applicant. Using the Government's pre-Jet Zero assumptions, the increase in emissions associated with this project would have been in the region of 1MtCO2 in 2050; the</p>	<p>The Applicant has responded to AEF's concerns regarding uncertainty of the measures to achieve Government targets at Section 3.5 of its Relevant Representations Report [REP1-048].</p> <p>The Government (and the Applicant) acknowledges that certainty cannot be applied to any specific measure and that the journey to net zero will be marked by changes in technologies, market mechanisms etc. It is for that reason, however, that the JZS explains that the Government has “a clear goal, with multiple solutions” and the Government “remains committed to achieve net zero aviation by 2050, whilst being flexible over the pathway to achieve it”.</p> <p>As the JZS acknowledges:</p> <p><i>“Although we recognise the high level of uncertainty associated with new technologies, we believe the principles and measures set out in this Strategy will provide the framework required to achieve ambitious in sector emissions reductions.”</i> (para 1.8).”</p> <p>Similarly, JZS – One Year On emphasises the importance which the Government attaches to monitoring, particularly because the JZS contains a range of strategic</p>

Topic	Matter Raised	Applicant's Response
	<p>adoption of the Jet Zero assumptions sees this number fall to 0.513MtCO2 in 2050. This highlights the sensitivity of the forecasts to the assumptions regarding proposed mitigation. The Department for Transport believes that there is still sufficient economic and market uncertainty to prevent them from making any meaningful long-term demand forecasts of air passenger growth. The last official forecast was produced in 2017.</p> <p>While the Jet Zero modelling did include an assessment of the emissions associated with UK airport planning applications, either underway or anticipated, it is not clear if the forecast emissions for the project as set out by the Applicant are higher or lower than the DfT's Jet Zero estimate. Preliminary analysis by AEF (based on modelled air traffic movement numbers) of likely Jet Zero figures suggests that the Government's assumptions for Gatwick emissions may be lower in 2050 than the Applicant's figures in which case it would be hard to argue even that the project was consistent with Jet Zero modelling. We have written to the DfT to ask for any Gatwick-specific information associated with the Jet Zero modelling and will provide this to the examination in due course (if information is disclosed).</p>	<p>principles and policy measures that adds complexity to evaluating the strategy and, therefore, that the Government must be alert to changes in each of these so that it can respond in order to meet its commitments (page 12).</p> <p>GAL acknowledges the change in forecast aviation emissions arising from the Project between production of the Preliminary Environmental Impact Report (PEIR) in 2021 and production of the Environmental Statement in 2023. Prior to the UK Government adoption of the Jet Zero strategy there was no effective policy framework in place to manage UK aviation levels and the PEIR modelling incorporated only moderate average efficiency improvements for aircraft engines. The impacts of other technological developments that have informed the modelling for ES were not present in the PEIR modelling.</p> <p>Achieving Jet Zero is not reliant upon demand management. Instead, the Jet Zero Strategy sets out a wide range of policy measures, including emissions trading, all of which will be utilised as required to ensure that net zero is achieved. In decision letters at Stansted, Bristol, Manston and Luton, the decisions have established the importance of the wide range of measures available to achieve carbon reductions and the appropriateness of land use planning decisions assuming that those regimes operate effectively.</p> <p>The Government's approach in the JZS is to recognize that it is the combined impact of a basket of measures that will ensure the trajectory to Jet Zero. That conclusion does not rely on a precise forecast for individual airports and it is apparent that the Government has tested alternative scenarios and came to the same conclusion. In its Response to the annual report of the Climate Change Committee, in October 2023, for example, the Government explained that:</p> <p style="text-align: center;"><i>"DfT analysis shows that, in all modelled scenarios, we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock on social and economic benefits."</i>)</p>
Greenhouse Gases	The Applicant claims (16.9.77 of APP-041) that "Jet Zero commits the UK Government to implementing measures to fulfil its legal duty on net zero, and to management of emissions from aviation within this." In fact, however, while the Jet Zero Strategy set out the Government's targets and aspirations for emissions reduction, many of the measures that would be required to achieve this are uncertain and some are beyond the Government's control.	The fact that the Jet Zero Strategy relies on a wide range of measures is directly recognised in the Strategy itself. It is partly for that reason that the Government has mobilised a wide range of policy initiatives and deliberately adopted a monitor and manage approach to ensure its committed outcome. The Jet Zero Strategy is clear that it will take further measures if necessary to ensure that the emissions reduction trajectory is met.

Topic	Matter Raised	Applicant's Response
	<p>The rate of commercialisation of more efficient aircraft, for example, is not typically a matter for national governments and the Jet Zero Strategy makes no policy proposals on this topic. Similarly, the strategy makes optimistic assumptions about global carbon markets but beyond advocating for global policy change, the UK has no power to ensure that a replacement for the CORSIA scheme does in fact become more rigorous after CORSIA ends in 2035, and the strategy does not propose any backstop policies if the plan to rely on the international carbon market is not successful. While the UK ETS, applicable to domestic and international departures to EEA destinations, offers a more robust scheme that the Government intends to align with net zero, its international route coverage is also subject to CORSIA rules and the Government is still carefully considering the approach to this interaction</p>	
<p>Greenhouse Gases - Carbon Pricing</p>	<p>In the Jet Zero 'High Ambition' scenario carbon pricing accounts for 27% of the emissions reduction in 2050 through higher air fares and the consequential impact this has on demand for air travel. In Jet Zero the assumed carbon price is taken as a proxy for decarbonisation costs. However, the UK ETS allowance price was significantly below its EU counterpart in the summer of 2023 following a Government decision to allow entities to retain unused allowances issued during the pandemic, and the price has continued to fall. In December 2023, allowances are trading at £32.66, significantly below the low price scenario used in the modelling. According to the Jet Zero modelling, UK ETS allowance prices in 2023 were assumed to be £71/tCO₂ in the central scenario, £95/tCO₂ in the high scenario and £53/tCO₂ in the low scenario. Prices are likely to remain lower than forecast until at least 2027. It is evident, therefore, that if the actual ETS price is lower or higher than the assumed ETS price, there will be a consequence for both emissions and demand, suggesting that emissions (and demand) are likely to be higher than predicted.</p> <p>The CCC has also advised Government that CORSIA offsets should not, without reform, be taken into account for the purposes of compliance with the UK Carbon Budgets</p>	<p>The advice from CCC to UK Government as to the applicability for CORSIA offsets for use to achieve UK Carbon Budgets is noted. The Jet Zero Strategy contains within its policy measures that commit to <i>“creating successful carbon markets and investing in greenhouse gas removals to compensate for residual emissions in 2050.”</i></p> <p>The approach within the assessment has been to consider the emissions arising from the Project in the context of the residual emissions modelling from Jet Zero. The residual emissions modelling from Jet Zero includes the cost impacts upon demand arising from ETS and CORSIA, rather than including the carbon benefit attributed to the CORSIA scheme offsets themselves. It is considered valid, therefore, to contextualise the resultant aviation emissions from the Project against the Jet Zero residual emissions trajectory; the aviation emissions estimated for the Project allow for technological improvements, use of SAF, and the introduction of zero emission aircraft at the rates assumed within the Jet Zero High Ambition scenario.</p>
<p>Greenhouse Gases - Sustainable Aviation Fuel</p>	<p>On uptake of Sustainable Aviation Fuel (SAF), while the Government has begun to develop proposals for a SAF mandate, big questions remain to be addressed about issues such as feedstock sourcing, and proposals to develop a UK SAF industry, beginning with the construction of five SAF plants by 2025, already look off track.</p>	<p>The uncertainties and challenges to deliver the High Ambition scenario within the Jet Zero Strategy are noted within the strategy itself.</p> <p>The UK Government in October 2023 responded to the CCC confirming its position that:</p>

Topic	Matter Raised	Applicant's Response
	<p>The Virgin Atlantic test flight took place as planned last November between London Heathrow and New York. The flight used 100% SAF (as opposed to the maximum 50% blend that it currently permitted on flights, requiring permission from the UK CAA, US and Canadian authorities). However, it doesn't change any of the issues about the supply or regulation of SAF. Tensions remain between industry and the Government in the UK regarding who should pay for SAF, particularly for a revenue stability mechanism. The SAF mandate is still not in place and questions about feedstocks that were raised in the last consultation remain to be resolved. The UN International Civil Aviation Organisation' (ICAO's) third conference on aviation alternative fuels (CAAF3) took place in November 2023 and agreed an aspirational target of only a 5% emission reduction from alternative fuels by 2030. Assuming a 70% average net emissions saving, this equates to around 7% by volume, significantly lower than the 10% by 2030 (by volume) ambition expressed in Jet Zero. Although ICAO's aspirational target is not attributable to individual states and doesn't prevent more ambition, if supply is constrained at this global level the UK may struggle to deliver its own SAF ambitions without a significant increase in UK SAF production. This is not evident and most of the five SAF plants that are due to be under construction in the UK by 2025 are not anticipated to start production until 2027 or 2028 at the earliest. The Government has announced that UK SAF use in the last twelve months increased to around 2.5% by volume, but as traffic continues to rebound from the pandemic, and UK production remains low; there may not be further increases to report in 2024.</p> <p>The Government, working through the Jet Zero Council, has only just begun a discussion on carbon removals (which are anticipated to deliver 18.7MtCO2 of emissions reductions by 2050).</p>	<p><i>"We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022.</i></p> <p><i>The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. • If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."</i></p> <p>GAL has demonstrated that the infrastructure and associated administrative processes are in place for the use of SAF at LGW. Within the wider aviation industry, the Applicant is supporting the development of SAF supply in the UK through its work with Sustainable Aviation. The Applicant is also supporting the Jet Zero Council's Sustainable Aviation Fuel Delivery Group.</p>
Greenhouse Gases	<p>There is a longstanding policy gap related to the non-CO2 climate warming impact of flying. The CCC states in its sixth carbon budget advice (box 8.6) "non-CO2 effects contribute around two-thirds of the total aviation effective radiative forcing – twice as much as historical CO2 emissions from aviation." (16.4.14 of APP-041) The Applicant argues, however, that:</p> <p><i>"[Given] that there remains no well-established methodology for quantifying non-CO2 emissions impacts, and there is uncertainty on how to identify the magnitude of their impact, this assessment does not attempt to quantify non-GHG and RF effects of emissions at altitude. Providing a comparative set of</i></p>	<p>The Government has set out its continuing approach to policy development in relation to non-CO₂ GHG, both in the Jet Zero Strategy and most recently in Jet Zero One Year On (which confirms at page 33 that the Government is committing to further research the effect of non-CO₂ impacts in order to develop any necessary policy response).</p> <p>These matters were considered at the Stansted inquiry in 2021 where the Inspectors concluded:</p> <p><i>"98, in this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the</i></p>

Topic	Matter Raised	Applicant's Response
	<p><i>figures alongside the CO2 emissions would be incompatible with an assessment against national CO2 targets, and as noted above, the generalised approach to providing CO2 equivalent estimates to reflect the combined impact of different GHGs is not transferrable to non-CO2 emissions.”</i></p> <p>We don't agree with the decision not to provide an appraisal of the non-CO2 impacts of the proposal. While it is true that uncertainties remain about the correct methodology for quantification of these effects for the purposes of policy, failure to provide any estimate is not an adequate response. While we await policy proposals for tackling aviation's non-CO2 impacts (the Government, working with the Jet Zero Council, has launched a work programme on this issue), it would improve the transparency of the proposal for an estimate of non-CO2 impacts to be provided, for example using the approach recommended by the Government for company reporting of travel emissions (which is to apply a multiplication factor of 0.7 to the CO2 impact to account for non-CO2) in order for the inspectors to weigh this additional harm in the balance. It should also be noted that the European Commission is consulting on the objectives, scope and first steps for establishing a monitoring, reporting and verification system for non-CO2 effects in aviation as part of the EU Emissions Trading Scheme (ETS), while the UK Government recently consulted on how non-CO2 impacts could potentially be included in the UK ETS in the future.</p>	<p><i>proposed development, particularly bearing in mind the government's established policy objective of making the best use of MBU Airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity – changing development, including at MBU airports, which seems far removed from the government's intention.”</i></p>
<p>Greenhouse Gases - Cap on Aviation Emissions</p>	<p>With aviation one of the hardest to decarbonise sectors, and solutions still decades away, an expansion on this scale should, in our view, be refused in the absence of much greater certainty about the effectiveness of proposed mitigations for aviation emissions. If, however, the airport has confidence in the Government's plan – as indicated in its Environmental Statement and as reflected in its use of the Jet Zero modelling assumptions – then the Applicant should agree to the imposition by the planning authority of an enforceable annual cap on aviation emissions associated with the airport.</p> <p>The Applicant states in relation to its Carbon Action Plan or CAP (1.2.2 of APP-091):</p> <p><i>“Our commitment to play our part in the UK's Jet Zero trajectory is not contingent on the Project being consented, but the CAP uses the legally binding nature of the DCO application to provide an additional level of assurance to stakeholders.”</i></p>	<p>The Applicant has responded to AEF's suggestion to cap aviation emissions at Section 3.5 of its Relevant Representations Report [REP1-048]. The Applicant has responded to this representation from AEF above. It is for the Government to control aviation emissions as part of its Jet Zero Strategy rather than seeking to do so through individual DCOs.</p>

Topic	Matter Raised	Applicant's Response
	<p>However, aircraft emissions are essentially excluded from the Plan. At the Issue Specific Hearing on conditions, representative of the Applicant argued that these emissions are beyond its direct control. The same could surely be said of aircraft noise, which is nevertheless frequently subject to planning conditions and limits on capacity, suggesting that there is no necessary 'direct control' requirement for the imposition of planning conditions.</p> <p>We note that despite adopting the Jet Zero modelling assumptions, Gatwick anticipates its own emissions trajectory being very different from the national trajectory – increasing from current emissions levels and then flattening out but not falling nearly as steeply as the average across all airports (Diagram 16.9.3 in APP-041, reproduced above). We would suggest that – as a minimum – it should be required by way of conditions that the Applicant's forecast level of emissions must not be exceeded in any year.</p> <p>A more stringent set of annual caps could also be considered. The Jet Zero Strategy still allows for a high level (nearly 20 Mt) of emissions to be generated by the sector even by 2050, with 'out of sector' carbon removals assumed to be in place to balance these emissions. Arguably the curve towards zero should be much steeper.</p> <p>The setting of an emissions condition would help to provide accountability for the claims and assumptions being made. While this approach would be new, and would require some additional work to be done in terms of developing the appropriate wording for a planning condition, we see a strong case for introducing one if the scheme should go ahead given the importance of the climate change issue and the current lack of enforceability of hoped-for emissions reductions.</p>	
'Making best use' of existing capacity	<p>During Issue Specific Hearing 1, addressing the need for the proposal, the Applicant stated that using its emergency runway as a second runway was consistent with the Government's Making Best Use of Existing Runways policy or 'MBU' (June 2018). We can find no evidence to support this assertion.</p> <p>MBU makes an assessment of how much extra capacity could be realised nationally if all airports were to go beyond the 'base case' and instead make best use of their capacity. MBU states that the base case capacity for UK airports is 409.5 million passengers per annum (mppa) in 2050, consistent with its UK Aviation Forecasts 2017, based on retaining (then) planning Air Transport Movements (ATMs) and terminal caps (paras 5.40-5.49 of MBU).</p>	<p>The Applicant has responded separately to similar points raised in the representations from CAGNE at Appendix B: Response to CAGNE Written Representation (Doc Ref. 10.14).</p> <p>The question of whether or not MBU policy places any limitation or cap on the scale of increased aviation capacity that is appropriate has been discussed at the Stansted and Manston inquiries. In both cases, the decision makers found that there is no cap on the scale of development that can be consented consistent with MBU. At Manston, the Secretary of State concluded:</p>

Topic	Matter Raised	Applicant's Response
	<p>The baseline figures for Gatwick are based on the airport operating with one runway (52 mppa and 297,000 ATMs). Table 1 of MBU goes on to say that if all UK airports are allowed to make best use of their runways, the UK total capacity could increase from 409.5mppa in 2050 to 421.3mppa (an additional 11.8mppa).</p> <p>As the DCO application for use of the emergency runway would clearly result in a much larger increase in passenger numbers than the 11.8 mppa that is assumed to be possible nationally under the MBU assessment, it is unlikely that Government envisaged regular use of Gatwick's emergency runway as falling within the definition of 'making best use' of capacity.</p>	<p><i>“the MBU policy does not limit the number of MBU airport developments that might be granted and does not include a cap on any associated increase in ATMs as a result of intensifying use at MBU airports.” (paragraph 47) (Emphasis added)</i></p>

9 Ben Benatt

9.1.1. Table 9.1 sets out the Applicant's response to the matters raised in the Written Representation from Ben Benatt [\[REP1-115\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 9.1 Response to Written Representation from Ben Benatt

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	<p>I strongly object to the proposed expansion of Gatwick (GAL) via the development of a new Northern Runway for very many reasons. Foremost among these is that, however the figures are presented, common sense alone will make clear that this development (and indeed any significant expansion of a major airport) directly contradicts any intention to reduce emissions of greenhouse gases. There is a climate emergency, and aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should be rejected on climate grounds alone. If consent is granted there should be a binding cap on aviation CO2 emissions. The proposed development will necessarily pose a significant threat to the Government's chances of meeting legally binding targets set under the Paris Agreement 2015. In addition to this Horsham District Council declared a Climate and Ecological Emergency in June 23 and agreed a Climate Action Plan in January 24 - expansion of Gatwick is directly in contradiction of these HDC policies. Additional points in relation to climate impacts are as follows: Environmental Assessment guidance states that assessment should be against</p>	<p>Similar points were raised in Relevant Representations and responded to by the Applicant in Section 4.16 of the Relevant Representations Report [REP1-048].</p> <p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p>

Topic	Matter Raised	Applicant's Response
	<p>the realistic worse case. This has not been done - i.e. an increase from 40.9m passengers in 2023 to 80.2m in 2047 is an increase of nearly around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, just 1/3 of this increase. This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights. The Applicant appears to have excluded emissions sources such as maintenance, repair, and replacement during the operational life cycle stage of the Project, with no justification. This must be corrected and re-assessed as part of the DCO process. The Applicant appears not to have applied the Well To Tank to aviation emissions during the operation of the scheme either. This must be corrected and reassessed as part of the DCO process. These omissions, inconsistencies and failures to adhere to globally recognised GHG Protocol Corporate Accounting Standard means the Applicant has under-reported aviation emissions by around 20% - which means roughly 1MtCO2e being entirely unaccounted for EVERY YEAR throughout the construction period and led to possible omissions, inconsistencies and failures in the aviation emissions stated during the operation period also. This must be corrected and re-assessed as part of the DCO process.</p>	<p>This is noted in ES Paragraph 16.10.4 of ES Chapter 16: Greenhouse Gases [APP-041] that references the IEMA Guidance noting that “<i>The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.</i>”</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>The assessment does not seek either to develop a Corporate Reporting Account for Gatwick Airport Ltd (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project for a full 120 years study period. The methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment as required by IEMA.</p> <p>It is not disputed that Well-to-tank emissions arise in the supply chain for fuels, and methodologies for estimating these (as an uplift to direct emissions) are well established. However, the approach adopted is based on the assessment process which contextualises emissions against a) the UK carbon budget and b) the Jet Zero Strategy.</p> <p>The RICS Guidance on Whole Life Carbon assessment currently in force dates from 2017. The revised guidance will come into force in July 2024. Neither version lists the assessment of User emissions (within Module B8) as a mandatory item for inclusion. As such the assessment exercise within ES Chapter 16: Greenhouse Gases [APP-041] (as required by ANPS) captures a larger scope of emissions than is mandatorily required by RICS Whole Life Carbon assessment guidance by including surface access emissions from passengers, and by including emissions from aircraft.</p>

Topic	Matter Raised	Applicant's Response
		<p>With regards to Well-to-tank considerations – this requires some care regarding the inclusion of WTT emissions arising from different sources when considered in the context of the assessment contextualisation within a UK framework.</p> <p>The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years – see https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero legislation. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it was also removed from other aspects of the GHG assessment.</p> <p>However, it is acknowledged that the inclusion of WTT for Construction, ABAGO, and Surface Access would be useful for contextualisation against the UK Carbon Budgets. The WTT emissions for these will be calculated and provided at Deadline 4.</p> <p>It is acknowledged that maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the Carbon Action Plan, specifically regarding the employment of PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>ES Chapter 13: Air Quality [APP-038] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local authorities. A robust assessment of the construction and operational periods presenting reasonable worst case effects has been provided in line with best practice guidance and available data.</p>

Topic	Matter Raised	Applicant's Response
		<p>The assessment concludes that the impact of the Proposed Development would not be significant.</p> <p>In terms of noise, responses are provided in the later rows relating to this Written Representation below.</p> <p>In terms of transport, the Applicant has responded thematically to comments made within relevant representations regarding congestion and mode shares at Section 4.26 of the Relevant Representations Report [REP1-048].</p>
Climate Policy	<p>Contends that current national aviation policy is outdated (Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018)) is out-of-date, specifically with respect to climate change. This should be updated before a decision is made by the Secretary of State.</p> <p>Climate change is a significant impact and should be addressed fully as part of the DCO process. The Applicant must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact. Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.</p>	<p>It is apparent that Mr Benatt objects not only to the NRP application but also to government policy for aviation. As his representations explain:</p> <p style="text-align: center;"><i>“current national aviation policy is outdated.”</i></p> <p>However, this examination is not the place to challenge national policy. The application has been assessed against national policy, for example, Section 8.7 of the Applicant's Planning Statement [APP-245].</p> <p>As noted above, the impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022).</p> <p>The NRP application falls to be considered against current government policy. That policy is not out of date. Indeed, the publication of Jet Zero – one year on in 2023 demonstrates that the government is committed to actively monitoring and enforcing its policy, adapting measures as necessary to achieve its committed climate change objective.</p> <p>The Climate Change Act 2008 makes clear that the responsibility lies with the Secretary of State to develop policies and procedures to manage carbon from aviation and other sectors in order to meet its net zero commitment. The policies against which the application is being considered provide the framework consistent with that objective.</p>
Water Environment	<p>The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated through the following measures: Address existing poor quality of</p>	Water Quality

Topic	Matter Raised	Applicant's Response
	<p>River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. Future environmental and local impacts should certainly be no worse than now.</p>	<p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included at Figure 11.8.1 of ES Water Environment Figures [APP-057]. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p>

Topic	Matter Raised	Applicant's Response
		<p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with the mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078] (FRA). The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p>
Surface Transport - Modelling criticisms	GAL should model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere. Local traffic congestion and parking impacts in and around Gatwick should not be worse. Environmental Assessment guidance is that assessment should be against the realistic worst case. This has not been done. The modelling, scenarios and actual impacts should be compared to the	<p>The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of The Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 4: Surface Transport [REP1 059].</p> <p>On the query on luggage space, the Applicant has provided a response in Appendix C (Rail Passenger Modelling Clarification Note) of The Applicant's</p>

Topic	Matter Raised	Applicant's Response
	<p>current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen and future environmental and local impacts should be no worse than now. The Applicant has two highway solutions and model a 33% increase in cars which will clearly be unacceptable in terms of increased traffic, air pollution and CO2 emissions - why has it not even considered increasing investment in coach and rail travel?</p>	<p>Response to Actions from ISH2-5 [REP2-005].</p> <p>On assessing a realistic worse case, this was raised by the Examining Authority at Issue Specific Hearing 4 and responded to at Deadline 1 in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] (Action Point 1).</p> <p>The 33% increase in highway demand is in relation to Table 68 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] and relates to the baseline increase in passenger highway demand from 2016 to 2047.</p> <p>Comprehensive strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the Transport Assessment [AS-079]). Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works surface access improvement works as part of the Project.</p> <p>ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] sets out the commitments to fund buses and coaches, as well as funding for local authorities to implement effective parking controls off-airport and undertaken enforcement actions.</p>
<p>Noise and Vibration - Night flights</p>	<p>There should be no night flights, stronger noise limits and a mitigation scheme. The ExA needs to make sure these requirements are included in any consent conditions.</p>	<p>Night flights are controlled by the DfT through the Night Flight Restrictions that the environmental noise assessment assumes will continue. It is also confirmed that the northern runway will not be routinely used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport's main runway at the date this Order is made) is not available for use for any reason.</p> <p>In addition, the Noise Envelope to be introduced with the DCO places noise limits on noise levels during the day and night periods.</p> <p>A new Noise Insulation Scheme [APP-180] is also proposed for the Project and (by default) addresses both the baseline noise environment and the increased aircraft noise exposure due to the project.</p> <p>All of the above matters are secured by requirements proposed within the Draft Development Consent Order Schedule of Changes [REP1-004].</p>
<p>Section 106 Agreement</p>	<p>The Applicant must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts - as part of a new Section 106 agreement</p>	<p>The DCO s106 Agreement will only apply to the airport in the event that a DCO is granted and then implemented. GAL is in discussion with Crawley Borough Council</p>

Topic	Matter Raised	Applicant's Response
	<p>regardless of whether the airport is expanded or not. This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.</p>	<p>and West Sussex County Council to extend the current (2022) Section 106 Agreement for a further year (to the end of 2025) so the outcome of the NRP DCO can be taken into account.</p>
Air quality	<p>There should be examination of the concerning research undertaken by Georgia Gamble for her PhD thesis at Imperial College, London as can be viewed on a 3 YouTube video titled 'Cohort 2 Presentation Annual Conference 2023 - Georgia Gamble' around the worryingly high levels (currently unmonitored) of toxic volatile particulate matter down-wind of Gatwick airport currently, as this situation would significantly worsen if the proposal goes ahead.</p>	<p>Volatile particulate matter (VPM) from aircraft is included in the PM₁₀ and PM_{2.5} emissions calculated for assessment using the methodology detailed in ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158].</p> <p>The Applicant has responded to concerns that air quality will worsen as a result of the NRP at Section 4.3 of its Relevant Representations Report [REP1-048].</p>
Water Environment	<p>The Applicant needs to address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. Impacts on over-abstraction in the Sussex North Water Zone need to be addressed by the Applicant. Can the Applicant give legal guarantees in perpetuity that no water shall be extracted from the Hardham site or anywhere within the Sussex North Water Zone? The ExA needs to be forensic in its examination of this vital aspect to ensure that irreplaceable aquatic and water-dependent habitats are not endangered by this project.</p>	<p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as Figure 11.8.1 in the ES Water Environment Figures [APP-057]. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project</p>

Topic	Matter Raised	Applicant's Response
		<p>that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Water Framework Directive Compliance Assessment [APP-143] Appendix 11.9.2 identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through</p>

Topic	Matter Raised	Applicant's Response
		<p>the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this area. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project. The Applicant has further explained its position in response to ExA question WE.1.9 (Doc Ref. 10.16).</p> <p>Separately to the Project, Gatwick is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The Airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, the Applicant does not envisage a scenario when it would develop a new local source of water.</p>
Ecology and Nature Conservation	Biodiversity, Ecology and Arboriculture - the Applicant has failed to specify area size so it is impossible to accurately assess the impact of the construction period. The Applicant has given no assurances that the GAL Biodiversity Action Plan (BAP) will definitely continue. Removing trees from Ancient Woodland. This should not be permitted, and more details needs to be supplied. The Applicant needs to ensure that newly created habitats are monitored and reported to the Local Authorities for a 30-year period minimum.	<p>The Applicant is unsure what the Interested Party means by 'failed to specify area size' and would appreciate further clarification in order to provide a response.</p> <p>GAL will continue the implementation of its BAP through the Second Decade of Change programme, regardless of NRP, and reports on the Second Decade of Change annually.</p> <p>As set out in ES Chapter 9: Ecology and Nature Conservation [APP-034], no ancient woodland is proposed for removal as part of the Project.</p>

Topic	Matter Raised	Applicant's Response
		GAL have committed to the management and monitoring of the habitats to be created, as set out in ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 - 4 [REP2-021] , [REP2-023] , [REP2-025] , and [REP2-027]

10 Bernard Fisher

10.1.1. Table 10.1 sets out the Applicant's response to the matters raised in the Written Representation from Bernard Fisher [\[REP1-117\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 10.1 Response to Written Representation from Bernard Fisher

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	The criterion for judging greenhouse gas emissions is based on the IEMA Guidance on climate change, discussed in Chapter 16 of the Environment Statement. The crucial point is the alignment of greenhouse gas emissions with the Pathway to Net Zero. Construction of the northern runway will lead to an increase in greenhouse gas emissions from surface access. Whether the increase is justified depends on detailed planning for meeting the Net Zero Pathway (required in statutory legislation), which does not at present exist. (Note there is a similar lack of detailed planning to meet national targets on PM2.5, also within statutory legislation)	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed.</p> <p>The Applicant's ES Appendix 5.4.2: Carbon Action Plan [APP-091] focusses on three key airport emission sources: airport buildings and ground operations, aviation and construction. Under each heading the CAP sets clear outcomes that GAL is committing to deliver. To achieve those outcomes, GAL will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve.</p> <p>The IEMA guidance does not direct that emissions cannot increase from a project, but that the conclusion drawn as to significance of the emissions must draw not only on the scale of emissions, but also the mitigation adopted to (where possible)</p>

Topic	Matter Raised	Applicant's Response
		<p>reduce these, and also whether sufficient action is being undertaken to achieve a rate of reduction that complies with up-to-date policy.</p> <p>Paragraph 13.5.34 and Table 13.5.3 of ES Chapter 13: Air Quality [APP-038] considers the updated PM_{2.5} future standard within the context of the ES assessment.</p>
Greenhouse Gases	<p>The Environmental Statement then goes on to justify the development, because the increase in the surface access emissions is a small fraction of the total UK carbon budget (Table 16.9.8). This approach is not justified. It means that any project could be judged “insignificant”, because it is a small fraction of the total UK carbon budget. It effectively implies that any local development should be approved! Instead one needs a detailed plan regarding future UK greenhouse gas emissions, which might allow an increase for some developments, because of national need, if this is balanced by mitigation, or a decrease in national emissions elsewhere, produced by greater efficiency.</p>	<p>It is not the purpose of the GHG assessment to justify the development, and it does not seek to do so. The purpose is to assess impact, as set out in the response above.</p> <p>As set out above, the conclusion on significance is not solely based on consideration of the magnitude of emissions, and changes in emissions levels. The considerations within the assessment of significance are also set out in the response above.</p>
Greenhouse Gases	<p>The Gatwick Airport Limited project appears to lead to an increase of 0.1 MtCO_{2e} in greenhouse gas emissions between 2033-37, from surface access emissions over the 5 year period. The UK carbon budget over the same period is about 1000 MtCO_{2e}, so the increase is about 0.01% (Table 16.9.8). The increase from surface access emissions of the proposed development is about 20,000 tCO_{2e} per year. Flying will add between 3 to 4 MtCO_{2e} per year. The greenhouse gas emission from aircraft is therefore much larger than the surface access related greenhouse gas emissions, but is not localised to the UK. The consequence of statutory legislation regarding the Pathway to Net Zero of these different sources of greenhouse emission is unclear to me, and is not made clear in the Environmental Statement.</p>	<p>The assessment has clearly sought to consider the impacts and alignment with appropriate net-zero trajectories for each of the four emissions topics: construction, ABAGO, surface access, and aviation. This alignment has been considered both for the net impacts arising from the Project <u>and</u> for the impacts arising from Gatwick Airport operations as a whole.</p> <p>Additionally, the assessment has considered the impacts in aggregate, contextualising these against carbon budgets, and considering the policy framework in place at a national level to manage emissions levels in future so as to align with legally binding targets for UK emissions.</p>
Greenhouse Gases	<p>There would be a 5.555 MtCO_{2e} increase in aviation greenhouse gas emissions because of the Gatwick Airport Limited project, in the years 2033-37, the period of the Sixth Carbon Budget (Table 16.9.10), or an increase of 1.111 MtCO_{2e} per year. Total aviation emissions from Gatwick are 3% of the total UK airport aviation carbon budget emissions, and the increase with the project is 0.6% of the total UK airport aviation carbon budget emissions in the five year budget. Thus the report accepts that the northern runway development leads to an increase in airport aviation emissions and must have some adverse impact. Paragraph 16.9.76 in the Environmental Statement appears to acknowledge that aviation has an adverse impact, but appears to put responsibility on government policy, and not on individual airports? There is a desperate need</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed. The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>

Topic	Matter Raised	Applicant's Response
	here for clarification on how to compare and judge fairly, aviation and road transport emissions.	The Climate Change Act places a duty on the Secretary of State to take such measures as are necessary to enable Carbon budgets to be met. The Government has made clear its approach to that duty, including in relation to the role to be played by airports and how the government intends to meet its climate change commitments alongside recognizing the importance of the aviation sector.
Greenhouse Gases	In summary, the conclusion that the impact of aviation greenhouse gas emissions is "minor adverse, not significant effect" (16.9.84) is wishful thinking. At the present time, given the absence of policy direction, it is not possible to judge the significance of aviation emissions.	Please refer to the response above on the approach to the assessment of significance.
Air Quality – PM2.5 Air Quality Criteria and Assessment	<p>There are two aspects which have been neglected in the Environmental Statement. The PM2.5 concentration target should include the natural PM2.5 contribution, such as sea salt. There is no mention of the natural fraction of PM2.5, equal to about 1.4 µg/m³. This would make a 12 µg/m³ PM2.5 concentration target effectively equivalent to a 10 µg/m³ PM2.5 concentration target for human made emissions</p> <p>Secondly, only primary PM2.5 is considered in the calculation. NOx emissions will contribute to the formation of secondary PM2.5 in the atmosphere. This fraction of the PM2.5 should not be neglected. This invalidates the air quality calculation which should be extended to include secondary PM2.5.</p>	<p>Defra background predicted PM_{2.5} concentrations include the natural sources of particulate matter (PM) (e.g. sea salt contribution) and secondary sources of PM (e.g. NOx contribution). These have been used to predict the total PM_{2.5} concentrations used in the air quality assessment with a conservative assumption that there are no improvements beyond 2030. The assessment of significance follows the methodology detailed in ES Chapter 13: Air Quality [APP-038] which uses the targets and objectives as they are published, rather than adjusting them for human made emissions. This is in line with industry guidance.</p> <p>Secondary PM arises from reactions of gases in the atmosphere. These reactions take place slowly in the atmosphere, with a time frame of hours to days (SNIFFER, 2010¹), thus emissions of NOx, SO₂ and VOCs from Gatwick will only contribute to secondary PM many kilometres downwind of Gatwick. It is for this reason that secondary PM is considered to be a regional pollutant and concentrations are relatively uniform over large areas.</p> <p>Background annual mean concentrations of PM_{2.5} over the wider study area in 2018, as published by Defra background concentrations were in the range 8.4 to 13.2 µg/m³, of which 6 to 6.4 µg/m³ is secondary PM_{2.5} covering both secondary inorganic and secondary organic PM_{2.5}². Secondary particles are predominantly ammonium nitrate, ammonium sulphate and organic particles. The nitrate component is likely to be up to 1.9 µg/m³ (18% of PM_{2.5} as ammonium nitrate), sulphate up to 3.0 µg/m³ (28% of PM_{2.5} as ammonium sulphate), and organic particles of the up to 1.6 µg/m³ (15% of PM_{2.5} being other organic matter), based on research (SNIFFER, 2010¹). These nitrate, sulphate and organic components will arise from emissions of NOx, SO₂ and VOCs from sources throughout the UK and to some extent emissions from sources across continental Europe (especially northern Europe); due to the slow formation of secondary particles. Emissions from</p>

¹ Scotland & Northern Ireland Forum for Environmental Research (SNIFFER) (2010) PM2.5 in the UK, December 2010

² Department for Environment, Food and Rural Affairs (Defra) (2019a) Modelled background pollution data

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		<p>local sources will make a minor contribution to these local background concentrations.</p> <p>NAEI provides information on UK emissions of NO_x, SO₂ and VOCs for 2021³. Total emissions were 677 ktonnes (kt) NO_x, 126 kt SO₂ and 781 kt VOCs (non-methane). Of these amounts 0.24 kt, 0.01 kt and 0.03 kt respectively are attributable to aircraft emissions at Gatwick airport, representing 0.036%, 0.007% and 0.004% respectively (taken from NAEI).</p> <p>Taking into account that Gatwick emissions are only part of the total, that the background concentrations are not due just to UK emissions, and that local emissions will not form secondary particles in the near field, it is reasonable to conclude that current emissions at Gatwick airport will contribute no more than 0.1% to the secondary PM across the wider study area. In other words, less than around 0.002 µg/m³ of the background ammonium nitrate, 0.003 µg/m³ of the background ammonium sulphate and 0.002 µg/m³ of organic particles in the wider study area will relate to current Gatwick emissions, with the Project changes due to the Northern Runway being even smaller.</p> <p>These contributions are considered to be negligible, representing less than around 0.05% of the annual mean air quality standard for PM_{2.5} of 12 µg/m³ to be achieved by 2028. With the NRP Project, contributions will remain negligible. It is thus considered appropriate to scope out the contributions of secondary PM to the calculated PM concentrations within the air quality assessment.</p>
Air Quality – PM2.5 Air Quality Criteria and Assessment	Claim that the calculation is conservative (paragraph 13.5.34 and again in 18.8.20), because the assumed background concentration (the air pollution coming into the area) has been frozen at the predicted 2030 levels. The background concentrations are likely to decrease, because of actions to reduce emissions by others in the UK and Europe. So action by others, say on road transport and domestic emissions, which benefits Gatwick air quality, is being used as an argument by the applicant	<p>The Applicant considers the use of the Defra predicted background concentrations is in line with best practice guidance and available data, as detailed in ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. The methodology used provides a robust assessment presenting reasonable worst case effects.</p> <p>The Applicant has responded thematically to concerns that there is not appropriate mitigation in place at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Air Quality – PM2.5 Air Quality Criteria and Assessment	The basis of the air quality assessment in the Environmental Statement is to use emissions from aircraft, surface access and the doubling of the CARE (central area recycling enclosure) facility and the 2030 background PM2.5 concentrations. The study is therefore restricted to a study area defined by a 10km x 11km grid over the airport and some affected network roads. The	ES Chapter 13: Air Quality [APP-038] has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local authorities. The study area includes the 10km x 11km grid to capture all roads and airport sources within the vicinity of the airport and all roads within the wider study area of the traffic model

³ National Atmospheric Emissions Inventory (2021). Available at: <https://naei.beis.gov.uk/data/data-selector>

Topic	Matter Raised	Applicant's Response
	<p>assessment should consider effects over a wider area as demonstrated later in these comments. The PM2.5 air quality target² also requires a 35% reduction in human exposure to PM2.5 by the year 2040. This statutory target is not mentioned in the Environmental Statement.</p>	<p>that are predicted to exceed the guidance screening criteria due to the Project. Section 13.5 of ES Chapter 13: Air Quality [APP-038] provides further detail of the study area assessed.</p> <p>Paragraph 13.5.34 and Table 13.5.3 of ES Chapter 13: Air Quality [APP-038] considers the updated PM_{2.5} future standard within the context of the ES assessment.</p>
<p>Air Quality Standards</p>	<p>It is surprising given the enormous effort put into the air quality assessment that an update to the national NO₂ air quality standard has not been considered. The highest, predicted NO₂ concentrations in Table 18.8.2 are close to the European Directive NO₂ limit value of 40 µg/m³, exceed the WHO guide value of 10 µg/m³ by a wide margin and exceed the WHO interim guide values (shown in Table 18.8.2 and Table 18.8.3. Both tables should be in the Air Quality Chapter 13.). It seems inevitable that over the planned lifetime of this project that the UK NO₂ limit value of 40 µg/m³ will be lowered and this possibility should be taken into account by Gatwick Airport Limited.</p>	<p>The Applicant has responded thematically to concerns that the assessment does not show compliance with the WHO guidelines in Section 4.3 of the Relevant Representations Report [REP1-048].</p>
<p>Air Quality Standards</p>	<p>The incremental 0.2 µg/m³ increase in PM_{2.5} concentrations from the Gatwick Airport Limited project may appear small (shown in Table 18.8.2 and Table 18.8.3). However, the study leading to the setting of the PM_{2.5} target considered a number different emission scenarios. The study showed that it is difficult to bring about large relative changes in PM_{2.5} concentration, when all the contributions from primary, secondary and natural sources are included. One cannot just assume that a small fraction of a baseline concentration means a small effect. The effect of any single source is nearly always likely to be small. In a somewhat similar way to assessing the significance of greenhouse gas emissions, one should consider the cumulative effect of multiple sources, and one source should not be judged in a preferential way</p> <p>Consideration of the population exposure and the formation of secondary PM_{2.5} mean that the receptors in a much wider zone of influence than that shown in Figs 13.1.1 to 13.1.9 should be considered.</p> <p>As the receptors are largely confined to a region around Gatwick, the Environmental Statement neglects secondary PM_{2.5} formed from NO_x. Although the incremental increase in concentrations may be very low at longer distances, further away from Gatwick, this will be compensated by the greater population exposed at longer distances. The calculation of the population exposure should not be confined to a small area around Gatwick. Important</p>	<p>Defra background predicted PM_{2.5} concentrations include the natural and secondary sources of PM such as sea salt contribution. These have been used to predict the total PM_{2.5} concentrations used in the air quality assessment. The assessment of significance follows the methodology detailed in ES Chapter 13: Air Quality [APP-038], following industry guidance. Therefore, the Applicant considers the natural fraction and secondary PM has been appropriately considered following best practices in the assessment provided in the ES.</p>

Topic	Matter Raised	Applicant's Response
	<p>contributions to the air quality impact have been ignored in this air quality assessment.</p> <p>Adding the natural component in Table 18.8.2 and Table 18.8.3 would suggest that the PM2.5 target concentration used in the Environmental Statement would be exceeded at more locations.</p>	
Significance of Air Quality Impact	<p>In paragraph 13.10.29 and Table 13.5.3 of the Environmental Statement, a case is made that the air quality impact is “insignificant”. This is based on using present air quality standards, which are much higher, and much less strict, than the standards set in the recently legislated targets for PM2.5 and the likely future limit value put on NO2. For example, applying 10 µg/m3 as the NO2 standard, instead of 40 µg/m3, implies that an increment of 0.2 µg/m3 would be of “moderate impact” if the same criteria were applied. [0.2 of 10 is 2% so the impact is “moderate” at some receptors.]</p>	<p>The Applicant has responded thematically to concerns that the assessment does not show compliance with the WHO guidelines at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Significance of Air Quality Impact	<p>The Environmental Statement cannot claim to be a “worst case” calculation, nor that the air quality impact is “insignificant”. Paragraph 18.8.2 effectively concedes that measures by others to address road transport will provide air quality improvements and not action taken by the project. The Gatwick Airport Limited project will not have any effect on moving towards achieving the latest WHO guide values for PM2.5 and NO2, so the assessment ignores these guide values.</p>	<p>The Applicant has responded thematically to concerns that the assessment does not show compliance with the WHO guidelines and concerns that there is not appropriate mitigation regarding impact on human health at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Unnecessary Detail in the Environmental Statement	<p>Paragraph 18.8.27 states explicitly that the baseline PM2.5 concentration will be lower than those shown in Table 18.8.6, because of the Government’s statutory commitments to Net Zero. Yet the applicant seems to think it has no role to play and the improvement will be brought about by the action of others, on solid fuel burning, road transport and industrial combustion etc. Table 18.8.6 focuses on concentrations at receptor positions and not on the overall population exposure, including secondary PM2.5. As the government has a statutory requirement to meet Net Zero, the government should provide guidance as how to accommodate sustainably, major developments, such as this Gatwick expansion, which increase greenhouse gas emissions</p>	<p>The Applicant has responded to concerns that there is not appropriate mitigation at Section 4.3 of the Relevant Representations Report [REP1-048]. In order to manage future emissions, measures and monitoring commitments will be secured via the DCO and updated Section 106 Agreement.</p>
Errors in Table 18.8.7 and 18.8.8	<p>In order to give some idea of the effect of secondary PM2.5 on the health impact and the treatment of limited receptor locations, I have included here in paragraphs (23) to (27) an alternative health risk calculation. The numbers may</p>	<p>Table 18.8.7 and 18.8.8 of ES Chapter 18: Health and Wellbeing [APP-043] calculations have been checked and are correct. The difference relates to Mr Fisher calculating a different metric. ES Chapter 18: Health and Wellbeing [APP-043] and ES Appendix 18.8.1: Quantitative Health Assessment Results [APP-208] are presenting the project change as a percentage of the baseline incidence</p>

Topic	Matter Raised	Applicant's Response
	<p>be only approximate, but they illustrate how one may understand the possible effect on human exposure.</p> <p>Table 18.8.7 contains an error. The additional mortality of 0.066 lives stated in the table within a population of 300,000 in 2029 is equivalent to about the mortality of 0.022 lives in a population of 100,000, for which the baseline mortality rate would be about 1000 lives. So the change in the baseline rate is 0.000022 or 0.0022%. This is much greater than the figure 0.00000002% stated in the table. Is this another way the project is obsessed by insignificance? I have estimated in paragraph (24) that the additional mortality in 2029 from air pollution exposure to be about 1.5 lives per year in a much larger population.</p> <p>Table 18.8.8 contains an error. The additional mortality of 1.086 lives stated in the table within a population of 300,000 in 2032 is equivalent to about 0.35 lives in a population of 100,000 for which the baseline mortality rate would be about 1000. So the change in the baseline rate is 0.000035 or 0.0035% rather than 0.000000026% as stated in the table. (The percentage also depends on the size of the population exposed). I have estimated in paragraph (26) the additional mortality in 2038 from air pollution exposure to be about 5 lives per year in a much larger population.</p>	<p>rate (which for 2029 is = 'Change in mortality risk in the local population' / 'Total receptor population (30+) x 'Baseline natural cause mortality age 30+ per 100,000 population', i.e. $0.066 / (308,725 \times 1,329.9) = 0.00000002\%$). This contextualises the contribution of the Project to local natural mortality rates.</p> <p>ES Appendix 18.4.1: Methods Statement for Health and Wellbeing [APP-205] Section 3, paragraphs 3.1.1 to 3.2.13 sets out the methodology for the air quality calculations, which uses Public Health England and World Health Organization formulae. These methods were agreed with the Health Topic Working Group as a pragmatic estimate of changes in selected health outcomes to identify the scale of change associated with the Project changes. This shows there to be a very small influence on population health outcome measures, which is consistent with the conclusion that there would not be significant adverse effects for population health.</p> <p>It is noted that UK Health Security Agency ("UKHSA") in their response on behalf of UKHSA and the Office for Health Improvement and Disparities ("OHID") conclude [RR-4687]: "Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health". UKHSA has particular technical expertise in air quality analysis and is satisfied with the approach used.</p>
Model Verification for NO2	<p>The treatment of the correction to the modelled NO2 calculations Appendix 13.6.1 of the Environmental Statement seems rather unscientific. If there is a systematic under prediction then some reason should be cited, possibly incorrect traffic emissions. There is discussion in the scientific community of whether emissions based on traffic cycles or real world emissions are best. Appendix 13.6.1 states that the adjustment for poor model performance is a multiplicative factor of 1.2 to 2 and a generic factor 1.3 is adopted. As NO2, or NOx derived PM2.5 are the main contributions to the health risk impact (attributable lives lost per year) in the health risk assessment, it is important to get the NOx modelling right without incorporating correction factors. No results for NOx concentrations are presented in the Environmental Statement, so one cannot check whether there is a problem with NOx emissions, or with the difficult step of estimating NO2 from NOx.</p>	<p>The Applicant has responded to concerns regarding the confidence of modelling for future years and model verification at Section 4.3 of its Relevant Representations Report [REP1-048].</p>

11 Brighton & Hove Economic Partnership

11.1.1. Table 11.1 sets out the Applicant's response to the matters raised in the Written Representation from the Brighton & Hove Economic Partnership [\[REP1-118\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 11.1 Response to Written Representation from the Brighton & Hove Economic Partnership

Topic	Matter Raised	Applicant's Response
Socio-Economics: Local Economy	<p>With an estimated increase of 13m passengers at the end of the forecast period of the Northern Runway development, which is equivalent to about a 20% uplift over the baseline, we foresee a significant uptick in visitor spend, supporting our tourism and heritage assets, as well as the hotel, restaurant and retail sectors in the city.</p> <p>Visit Britain estimates the average spend of inbound visitors to the UK as £848 per person which equates to an economic boost to B&H of over £110m if just 1% of this uplift was realised to visit the city. The BHEP, along with Tourism leaders would be keen to work with Gatwick to capitalise on this uplift via joint marketing and PR initiatives, focussing on 'original place of booking' campaigns in high value added international markets, in order to facilitate and increase visits southbound to B&H as well as throughout East and West Sussex as opposed to purely London bound visits.</p> <p>The Northern Runway Economic Impact Assessment report asserts that the airport will meet future passenger demand by serving around 75 million passengers a year by the late 2030s. The same metric as observed above would mean if just 1% of these passengers came to Brighton & Hove, the city would see a total of £630m of local spend. Providing job stability in an increasingly volatile hospitality sector and allowing business owners to upskill and recruit more staff. Helping Brighton & Hove to become a regional beacon of excellence within the tourism industry.</p>	Noted. The Applicant welcomes the comments in support for the Project and will work with partners to maximise economic benefits, including inbound tourism benefits, through the ES Appendix 17.8.1: Employment Skills and Business Strategy [APP-198] .
Socio-Economics: Regional Economic / Employment Benefits	<p>The BHEP acknowledges and supports the wider regional economic benefits, namely the economic footprint of £889m in gross value added (GVA), creating 10,900 additional jobs in 2038 outlined in development papers, including:</p> <ul style="list-style-type: none"> • economic activity on site at the airport (direct footprint of £284m GVA and 3,200 jobs); • economic activity of the supply chain of firms on site (indirect footprint of £118m GVA and 1,500 jobs); • economic activity of firms choosing to be located near the airport for the business opportunities that it presents (catalytic footprint of £487m GVA and 6,200 jobs) BHEP is also focussed on supporting Foreign Direct Investment (FDI) both within the city and wider Greater Brighton city 	Noted. The Applicant welcomes the comments in support for the Project.

Topic	Matter Raised	Applicant's Response
	region. We support the added value impact in FDI to be worth £4.7bn to £6.6bn to the UK economy over the 60-year assessment period.	
Socio-Economics: Sustainable Growth	To conclude, the BHEP supports sustainable growth at Gatwick airport, which will in turn have a significant impact on skills development in the region as well as supporting supply chains, employment, importing, exporting as well as foreign direct investment and BHEP supports the mitigations outlined in the development documents (such as the Jet Zero consultation) that aim to deliver that sustainable growth.	Noted. The Applicant welcomes the comments in support for the Project.

12 Britannia Hotels Group

12.1.1. Table 12.1 sets out the Applicant's response to the matters raised in the Written Representation from Britannia Hotels Group [REP1-119]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 12.1 Response to Written Representation from Britannia Hotels Group

Topic	Matter Raised	Applicant's Response
Land Agreement	Britannia Hotel Group are willing to negotiate a fee for the land edged blue on the plan, however if no reasonable fee can be agreed we will seek to object this proposal. The land indicated in Pink on the site plan is requested as permanent Land to Take, and Britannia Hotels Group is generally not inclined to consent this kind of agreement to take place. In any event during our meeting a formal request for a proposed purchased price was advanced; but we haven't received any reply so far.	<p>The Applicant has provided responses to the points raised by Britannia Hotels Group at Section 3.11 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant's agent has been attempting to discuss and negotiate a voluntary agreement. Whilst no agreement has been reached to date, discussions on a commercial agreement are continuing between the parties and that remains the Applicant's preferred outcome.</p> <p>The land detailed in pink is required for permanent acquisition. This land is required for the construction of the surface access highway improvement works as part of the Project.</p>
Negative Impact on Hotel	It doesn't appear clear, from the drawings provided, the reason why that strip of land is required, and we are concerned that any eventual future activity can have a negative impact on the signage indicating the hotel and in general have a negative impact on the hotel itself. For the above reason we strongly object on the proposal.	The Applicant is willing to discuss the concerns raised by Britannia Hotels as outlined in the Section 3.11 of the Relevant Representations Report [REP1-048], and has offered to meet to discuss these, however a meeting was declined by Britannia Hotels. The proposed use of the land is described within Section 3.11 of the Relevant Representations Report [REP1-048], but as detailed in the Design and Access Statement [APP-253 - APP-257], Works Plans [AS-017] and Statement of Reasons [AS-008]. The land in this location is required for the construction of the surface access highway improvement works as part of the Project. The Applicant would welcome a response and further discussion with

Topic	Matter Raised	Applicant's Response
		Britannia Hotels, including in relation to options for mitigating the impacts and signage solutions.

13 British Pipeline Agency

13.1.1. Table 13.1 sets out the Applicant's response to the matters raised in the Written Representation from the British Pipeline Agency [REP1-120]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 13.1 Response to Written Representation from the British Pipeline Agency

Topic	Matter Raised	Applicant's Response
Draft Development Consent Order	<p>In the absence of an agreement on protective provisions, if the Draft Order is confirmed in its current form and BPA's existing rights are extinguished, the Applicant will be in a position to prevent WGPL from continuing to access, operate, repair replace or maintain its apparatus, and as a result the supplies of fuel to Gatwick could cease or be interrupted.</p> <p>This could have very significant economic impacts not only on BPA as operator and WGPL as owner of the fuel pipeline but also on the airport as a whole and all business within the airport, including impacts on levels of local employment. We note that WGPL currently supplies around 93% of Gatwick Airport's jet aviation fuel. As a result the compensation costs could certainly be very significant indeed.</p> <p>It is not clear whether these very significant costs, which could be incurred if WGPL's operations in the area were impeded or unable to continue, have been provided for in the funding for the Draft Order. These costs could result in the Draft Order, including the costs of acquiring land and rights and delivering the scheme, being rendered uneconomic and undeliverable.</p>	<p>As previously stated, the Applicant appreciates the importance of the WGPL pipeline to the airport and has no intention of taking any action that jeopardises the viability or safety of this supply.</p> <p>The Applicant and BPA/WGPL are currently negotiating a side agreement in lieu of protective provisions on the face of the DCO that will offer protections to WGPL regarding the Applicant's exercise of powers under the DCO, to provide comfort that BPA/WGPL's safe and effective operation of the pipeline will be preserved. The Applicant remains optimistic that agreement will be reached during the examination.</p>
Draft Development Consent Order	<p>BPA as operator and WGPL as owner of high-pressure pipelines is required to comply with health and safety regulations. If the Draft Order is confirmed and the Applicant acquires WGPL's rights in relation to its apparatus, and takes over access to those plots of land containing WGPL's apparatus, WGPL and BPA will no longer be able to comply with the relevant health and safety and regulatory requirements. Given the specialised and potentially hazardous nature of the apparatus, interference with that apparatus following the acquisition of WGPL's rights could have very serious safety implications for construction workers operating over or in the vicinity of the apparatus, and members of the public in the proximity of such works.</p>	<p>The Applicant refers to its response directly above.</p>

Topic	Matter Raised	Applicant's Response
Draft Development Consent Order	BPA understands from the Applicant that the principal reason to acquire BPA's rights is to enable the Applicant to facilitate wider access across the apparatus. If this is the case, BPA objects to the Applicant's failure to minimise the rights which it seeks to acquire in seeking to acquire all of BPA's rights including those relating to the pipeline within Plot 1/175 a more restricted right could have been sought.	The Applicant refers to its response directly above.

14 Caroline Donegan

14.1.1. Table 14.1 sets out the Applicant's response to the matters raised in the Written Representation from Caroline Donegan [REP1-122]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 14.1 Response to Written Representation from Caroline Donegan

Topic	Matter Raised	Applicant's Response
Environmental Impact	<p>Assess worse case for environmental impact of surface transport, noise, air pollution and climate change. Increase from 40.9m in 2023 to 80.2m in 2047 is an increase of nearly around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, just 1/3 of this increase.</p> <p>Environmental Assessment guidance is that assessment should be against the realistic worse case. This has not been done. The modelling, scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen.</p>	<p>The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment [APP-031], and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42. Gatwick would continue to grow if there was no Northern Runway Project. The methodology is based on assessment of with and without development in future assessment years.</p> <p>In terms of transport and assessing a realistic worst case, this was raised by the Examining Authority at Issue Specific Hearing 4 and responded to at Deadline 1 in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] (Action Point 1). The Applicant has further explained its position in response to ExA question GEN.1.30, The Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>The Applicant has responded to concerns regarding air quality modelling of future years at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance, the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against</p>

Topic	Matter Raised	Applicant's Response
		<p>relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>Noise modelling has been carried out for a 'slower transition fleet' based on Air Transport Movement forecasts in which the rate of fleet transition is delayed by about five years and which would result in higher noise levels than the central case for the same periods. This represents the realistic worst case for noise effects and is set out in ES Chapter 14: Noise and Vibration [APP-039].</p>
Transport/Traffic Congestion	<p>Future environmental and local impacts should be no worse than now. GAL should model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere. Local traffic congestion and parking impacts in and around Gatwick should not be worse.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and rail impacts, at Section 4.26 of its Relevant Representations Report [REP1-048].</p> <p>The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of The Applicant's Written Summary of Oral Submissions from ISH4 Surface Transport [REP1 059].</p> <p>On the query on luggage space, the Applicant has provided a response in Appendix C (Rail Passenger Modelling Clarification Note) of The Applicant's Response to Actions from ISH2-5 [REP2-005].</p> <p>Commitment 8 in ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] commits the Applicant to providing funding for local authorities to implement effective parking controls off-airport and undertake enforcement actions. Paragraph 7 of schedule 3 of the Draft Section 106 Agreement [REP2-004] secures a contribution paid by GAL to CBC for the purposes of off-airport traffic management and/or parking control and enforcement with the intention of limiting unauthorized parking, deterring rat running and maintaining traffic flow.</p>
Section 106 Agreement	<p>Gatwick must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts - as part of a new Section 106 agreement regardless of whether the airport is expanded or not.- This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.</p>	<p>Appropriate controls to limit impacts identified through the Environmental Statement are secured through the Draft Section 106 Agreement [REP2-004].</p> <p>The DCO s106 Agreement will only apply to the airport in the event that the DCO is granted and then implemented. GAL is in discussions with Crawley Borough Council and West Sussex County Council about a new s106 Agreement that would apply to the airport following the expiration of the 2022 Agreement and prior to the DCO s106 Agreement taking effect. ES Appendix 5.2.3: The Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, DCO s106 Agreement or other consents and licences.</p>

Topic	Matter Raised	Applicant's Response
Air Quality / Noise / Water Environment	As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality.	<p>The Applicant has responded to concerns that air quality will worsen as a result of the NRP at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>In relation to noise impacts Please see the information provided in the Relevant Representations Report Table 4.22.1 in response to the thematic comment <i>Concern about the impact of future increases in levels of noise as a result of the Proposed Development.</i></p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account.</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project. The Applicant has further explained its position in response to ExA question WE.1.9 (Doc Ref. 10.16).</p> <p>Separately to the Project, the Applicant is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for the Applicant to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, Gatwick does not envisage a scenario when it would develop a new local source of water.</p>

Topic	Matter Raised	Applicant's Response
Existing Impacts	<p>The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated.</p> <ul style="list-style-type: none"> No night flights Stronger noise limits and mitigation scheme. Address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. 	<p>Noise</p> <p>Please see the information provided in the Relevant Representations Report [REP1-048] Table 4.22.1 in response to the generic comment <i>Concern about the current impact of noise from the airport, including night flights.</i> .</p> <p>The Project includes a series of noise mitigation measures including an enhanced noise insulation scheme that addresses all areas affected by aircraft noise in the future case with the Project, regardless of whether the project itself would increase those noise levels and as such addresses the total noise effect the airport not only that of the Project.</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environmental Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in the degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance</p>

Topic	Matter Raised	Applicant's Response
		<p>Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the</p>

Topic	Matter Raised	Applicant's Response
		predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.
Climate Change	<p>Climate change is a significant impact, and should be addressed. - Gatwick must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact. Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.-</p> <p>There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should not be supported on climate grounds alone.</p>	The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed. The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041] . Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.
Outdated National Aviation Policy	The Secretary of State should accept that the Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018) is now out-of-date, specifically with respect to climate change. This should be updated before a decision is made by the Secretary of State.	This comment is addressed to the Secretary of State rather than the Applicant. The Applicant does observe, however, that the Government has taken particular care to ensure that its aviation policies are monitored, managed and kept up to date.

15 Charlotte McAlister

15.1.1. Table 15.1 sets out the Applicant's response to the matters raised in the Written Representation from Charlotte McAlister [\[REP1-123\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 15.1 Response to Written Representation from Charlotte McAlister

Topic	Matter Raised	Applicant's Response
General	There has not been enough time to pull together all the arguments against Gatwick expansion " by the back door".	The Applicant carried out extensive pre-application consultation and engagement, and published a comprehensive Preliminary Environmental Information Report (PEIR) and undertook consultation on it over 12 weeks from 9 September 2021 to 1 December 2021. The Applicant has also responded to comments raised by Interested Parties regarding the need for the Project and whether it is a 'new runway' at Section 4.21 of its Relevant Representations Report [REP1-048] .

16 Charlwood Parish Council

16.1.1. Table 16.1 sets out the Applicant's response to the matters raised in the Written Representation from Charlwood Parish Council [\[REP1-124\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 16.1 Response to Written Representation from Charlwood Parish Council

Topic	Matter Raised	Applicant's Response
Air Quality	<p>Charlwood Parish Council are disturbed to find no reference to climate change nor air pollution in the DCO application documents. Along with noise and traffic congestion, these two factors impact our community more than any other. Charlwood Parish Council requests that this application is refused.</p> <p>Air quality is known to have profound effects on human health and longevity and we require Gatwick to fully fund in perpetuity, a full spectrum of air pollution monitoring program, with the results being made publicly available (full spectrum in order to future proof for future knowledge and understanding around the health impacts of air quality).</p>	<p>The Applicant has provided assessments relating to air quality in ES Chapter 13: Air Quality [APP-038] and ES Chapter 16: Greenhouse Gases [APP-041] as part of the DCO Application.</p> <p>The Applicant has responded to Charlwood Parish Council's points at Section 3.18 of the Relevant Representations Report [REP1-048]. The Applicant has also responded thematically to air quality monitoring commitments in Table 4.3.1 of the Relevant Representations Report [REP1-048].</p>
Noise	<p>Our community suffers significantly from noise pollution, we require an expanded noise monitoring program, funded by the airport in perpetuity and results being publicly available. The number of locations for noise monitoring to be expanded to include currently unmonitored locations such as Hookwood.</p>	<p>The Applicant has responded to Charlwood Parish Council's points at Section 3.18 of the Relevant Representations Report [REP1-048]. A substantially improved noise insulation scheme will be offered as part of the Project with an Outer Zone of approximately 3,900 homes including Charlwood, and a Schools Insulation Scheme see ES Appendix 14.9.10: Noise Insulation Scheme [APP-180].</p> <p>As part of the environmental impact assessment baseline noise levels were measured in Hookwood, ES figure 14.4.1, and the noise insulation scheme, ES Appendix 4.9.10: Noise Insulation Scheme [APP-180] refers to further measurements in Oakfield Cottages in this area. The noise and track keeping system includes a noise monitor in Charlwood, with the noise levels publicly available through the WebTrack system. Noise monitoring locations are discussed and agreed through the Noise and Track Monitoring Advisory Group (NATMAG) who is joined by officials from Gatwick, the DfT, NATS, air traffic control, airlines, and local authorities, and the Gatwick Noise Monitoring Group (GNMG), a sub-group of NATMAG that involves delegates from Gatwick, Environmental Health Officers from local authorities, and the Independent Technical Advisor to GATCOM. They evaluate and discuss the data collected from noise monitors around Gatwick including the locations for future noise monitors</p>
Transport and Surface Access	<p>Our residents are impacted by congestion. In order to help reduce congestion caused by local traffic, we require significant upgrade to all local pavements, including linking residencies by pavements that are currently not in place.</p>	<p>The Applicant has responded directly to Charlwood Parish Council's points at Section 3.18 of the Relevant Representations Report [REP1-048].</p> <p>The assessment in ES Chapter 12: Traffic and Transport [AS-076] does not</p>

Topic	Matter Raised	Applicant's Response
	<p>These include 2/3rds of a mile between Hookwood and Charlwood, and linking the residencies on the periphery of Charlwood to the village center.</p> <p>We also require the provision of pavement along site Perimeter Road North, linking Povey Cross with North and South terminal.</p> <p>We require the airport to provide a £5m infrastructure fund so enable the Parish to implement future projects that are identified as suitable mitigations to impacts caused by the airport expansion that may not yet have been identified.</p> <p>In order to act on the serious anti social behaviour by taxi and pick up drivers, we require the airport to fund, in perpetuity, the policing of illegal parking. Ideally this would be done by ANPR in association with appropriate parking controls.</p> <p>Funding must be provided for the upgrading of the popular pavement / path from Longbridge Roundabout to South Terminal to LTN120 standard.</p> <p>The Parish Council requires a fit for purpose, direct access option for pedestrians and cyclists from Longbridge Roundabout to North Terminal.</p>	<p>identify any locations where effects related to severance, amenity or fear and intimidation would be significant and therefore no mitigation is required.</p> <p>As part of the commitments contained in ES Appendix 5.4.1: Surface Access Commitments [APP-090] and the draft Section 106 Agreement [REP2-004] the Applicant is committing to provide a Transport Mitigation Fund (which would be available to address unforeseen impacts arising from the Project and could be used for interventions related to any transport mode) and Off-Airport Parking Support Contribution paid to CBC (for the purposes of off-airport traffic management and/or parking control and enforcement with the intention of limiting unauthorised parking, deterring "rat running" and maintaining traffic flow).</p>

17 Chartered Institute of Logistics and Transport (CILT)

17.1.1. Table 17.1 sets out the Applicant's response to the matters raised in the Written Representation from the Chartered Institute of Logistics [REP1-127]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 17.1 Response to Written Representation from CILT

Topic	Matter Raised	Applicant's Response
General	We support the Gatwick Northern Runway project because we consider that it is possible to achieve the social and economic benefits of a growth in air travel in a sustainable manner. Our support is entirely dependent upon strict conditions relating to Greenhouse Gas Emissions as outlined in this representation.	Noted. The Applicant welcomes CILT's support for the Project.
Forecasting and Need	It is clear that there is demand for additional air travel in the UK above the 2019 level. How much of this demand should be met is a matter for national policy and it has long been policy that not all demand should be met, primarily to ensure that the impacts are not greater than the benefits. At the regional level, it is also clear that demand for air travel in South East England will exceed available capacity in the next few years and this also applies to the local	Noted. The Applicant welcomes CILT's support for the Project.

Topic	Matter Raised	Applicant's Response
	<p>market around Gatwick, given that 2019 levels were already in excess of capacity at peak times.</p> <p>We have noted the forecasts of future demand in the Needs Case (Document reference APP250) and, in particular, how the forecasts are derived using a range of assumptions and with a range of sensitivity tests. It is always possible to make different assumptions but it notable that the point at which the existing runway capacity is exhausted is relatively consistent and that none of the assumptions or sensitivity tests demonstrate a scenario where additional capacity is not required. In terms of assumptions, our view is that the shorter term (2024-2027) may not see as much growth as the Base Case and, in the medium to longer term, Heathrow may be able accommodate more than 90 mppa even without a third runway, but these scenarios do not undermine the case for the Northern Runway.</p>	
Forecasting and Need	<p>Our view on the cargo forecasts is somewhat different, based on our knowledge and understanding of the cargo market. While the DfT passenger forecasts are well developed, the same cannot be said for cargo forecasts, an issue acknowledged by the DfT. There is therefore no top down forecast of UK air cargo and therefore more emphasis is placed on bottom up, airport specific cargo forecasts. We note the potential under-reporting of cargo tonnage and suggest that this would need a response from the CAA Statistics Department before it can be accepted. It is possible that this is cargo handled at Gatwick Airport but trucked to or from another airport for flight. This would be properly counted as not from Gatwick but nevertheless the airline or freight agent would record it at Gatwick. However, even if the revised figures are closer to reality, there are reasons why the forecasts of future cargo demand may be more modest. First, the pandemic brought about a trend towards all-cargo aircraft operations because passenger aircraft were simply not flying. This trend has reversed since the end of the pandemic, but not completely and all-cargo operations are finding new markets. Second, the main passenger aircraft operations at Gatwick, both now and in the future, are by Low Cost Carriers who, because of their short turnrounds, rarely carry any cargo. The main potential for cargo growth is in long haul operations but here the markets likely to be served at Gatwick, mainly leisure, also tend to be less important for cargo. In addition, the use of long haul narrowbodied aircraft such as the Airbus A321, in particular the XLR versions, have limited cargo capacity because of both volume and weight limits. Our third reason for more modest forecasts of future cargo at Gatwick is the limited infrastructure provided by the</p>	<p>The Applicant also notes the lack of long-term cargo forecasts from the DfT with the last outputs dating back more than 10 years. The growth in cargo at Gatwick is not forecast to come from short haul LCCs operating short turnaround times. This is also the case today as cargo volumes are driven by long haul services from a range of carriers and markets.</p> <p>The Applicant acknowledges the short term impacts of Covid-19 on passenger and freighter fleets, however these are not relevant in the context of the long term belly demand being forecast at Gatwick. Long haul passenger airlines will carry cargo as it provides a meaningful contribution to total route revenue, for some routes it can generate more than 20% of total revenues.</p> <p>Gatwick's growth is forecast to come from a range of markets and current growth patterns highlight the importance of cargo on markets such as India, China and the Middle East. New services have been added to all these regions and all airlines are carrying meaningful cargo volumes. These trends are forecast to continue and will support overall cargo growth projections at Gatwick in the long-term.</p>

Topic	Matter Raised	Applicant's Response
	<p>cargo operators (airlines, agents, logistics companies etc.) who are more likely to focus on Heathrow because of its range of long haul full service carrier operations, and all-cargo airports such as East Midlands and Manston, which now has approval to provide significant new capacity. It is also noticeable that the current plans do not feature any major expansion of the cargo facilities at Gatwick.</p>	
Forecasting and Need	<p>It is possible that the actual growth may turn out to be less than as indicated in the Need Case, for example if the strict conditions we propose for carbon emissions, noise and surface access restrict such growth or add to the cost of air travel. However, in such circumstances, the financial impact will be borne by the entities who own the airport. In other words, those entities will have to have confidence that the demand will be there and that the conditions can be met before they decide to invest.</p>	<p>Whilst the Applicant acknowledges the premise of the point, it is because Gatwick and its investors are confident in the robustness of its growth forecasts for the Airport (both with and without NRP), that it is promoting this scheme and intends to deliver the Project as soon as possible were consent to be granted.</p>
Climate Change: Airport Support Facilities	<p>Chapter 5 of the Environmental Statement, Project Description (APP-030), includes a few paragraphs on Power Strategy (5.2.142 to 5.2.145). These paragraphs relate to changes needed to facilitate the Northern Runway as associated facilities. Paragraph 5.2.145 notes that 'The relocation of substations and provision of additional capacity would allow for additional loads...' It is essential that these additional loads should include allowances for a major increase in electricity supply for charging the batteries of electric aircraft. Such aircraft may form a significant element of the fleets of aircraft operating at Gatwick and, indeed, if airlines are going to be able to meet the path towards net zero. The type of fuel for zero emission aircraft is still open to developments and it may be that a combination of electric and hydrogen power will be needed. Paragraph 5.2.55 has noted that refuelling facilities will be provided for electric and or hydrogen vehicles but the project must allow for facilities related to aircraft power to be provided. Sustainable Aviation Fuel is also likely to play a significant role but the facilities for this are, in general, the same as for current aviation fuels, although some additional facilities may be required to enable blending.</p>	<p>The Applicant concurs that the path to net zero is still evolving and fuel technologies continue to develop. The Applicant is keeping an open mind but, at this juncture, considers that electric powered aircraft are likely to be too small to form a significant part of Gatwick's future fleet and the airport will need to support larger aircraft that are more likely to rely on Sustainable Aviation Fuel (SAF) in the shorter term and hydrogen in the longer term. The airport has demonstrated its SAF capability already – as CILT note, it is compatible with existing fuel infrastructure. The infrastructure required for electric and hydrogen aircraft is, as yet, undefined and, as such, is difficult to make provision for. The Applicant is engaged with the UK Sustainable Aviation Coalition's work on decarbonization and the Jet Zero Council Sustainable Aviation Fuel Delivery Group as well as very specific infrastructure projects such as Connected Places Catapult Zero Emission Flight Infrastructure 2.</p> <p>In determining power requirements for the future, the Applicant has considered the increased demand arising from decarbonizing heat and ground vehicle fleets across the campus, as well as increasing use of electric vehicles by both passengers and staff. The potential requirements of an unknown combination of future fuel technologies are too uncertain to form part of the Northern Runway DCO submission, but the Applicant is very mindful of the potential uplift and will seek to safeguard for future scenarios, where appropriate.</p>
Surface Transport	<p>We note that the impact of construction traffic has been noted as a worst case without the use of rail for construction materials. However, we suggest that there is an opportunity that should be taken to transport construction materials by rail to a railhead to reduce construction traffic.</p>	<p>The Applicant has considered the options for transporting construction materials in developing the construction strategy (see paragraph 5.3.106 of the Preliminary Environmental Information Report contained in Consultation Report Appendices - Part B - Volume 3 [APP-226] and paragraph 7.4.5 of ES Appendix 5.3.2: Code</p>

Topic	Matter Raised	Applicant's Response
		<p>of Construction Practice Annex 3 - Outline Construction Traffic Management Plan [APP-085]. The Applicant recognises the sustainability benefits of reducing road traffic associated with construction but it is too early to be able to agree specific proposals. At this stage, therefore, the feasibility of using rail for construction is not confirmed and therefore the Applicant has assumed for the purposes of assessment that all construction materials would be transported by road.</p>
Surface Transport	<p>For the longer term, it is possible that further interventions will be needed, in particular in public transport for both passengers and staff. East-west connectivity, particularly from Kent, remains limited and the prospects for coach links will become increasing subject to road congestion, particularly on the M25. We remain of the view that a dedicated non-stop Gatwick Express service is a vital component of any future rail service pattern.</p>	<p>The Applicant has responded to comments received from Interested Parties regarding the provision of additional rail connections at Section 4.26 of the Relevant Representations Report [REP1-048]. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users. Where standing is expected on certain services, spare standing capacity would remain available. The rail crowding assessment indicates that no mitigation is required. The Applicant will continue to work with bus and coach operators to fund, deliver and review bus and coach services at the Airport as the Project progresses.</p>
Surface Transport	<p>We propose that the surface access targets should form part of a set of conditions for growth. If these conditions are not met at defined points in time, then further growth from that time should not be permitted. Conditions can, of course, be changed but a formal process through the planning system would be required.</p>	<p>The mode share commitments within ES Appendix 5.4.1 Surface Access Commitments (SAC) [APP-090] represent the position the Applicant is committing to achieve, based on the modelling of mode choice and transport network operation. The SAC contain commitments to monitoring and should it become apparent that the mode share commitments are not or may not be met, the Applicant will be required to identify and take further action to achieve the committed mode shares.</p>
Noise and Vibration	<p>We have considered Chapter 14 of the Environmental Statement, Noise and Vibration (APP039), and accept that the assessment methodology and results are a proper representation of the situation. In summary and in general terms, the growth of aircraft movements will slow an otherwise reduction in noise levels such that, on average, air noise remains at about the same level as 2019. This does not meet the objective of sharing improvements in individual aircraft noise levels with the community. In addition, the operation of a new runway, albeit close to the existing one, will create new routes and it is clear that new routes cause more disturbance than changes to noise levels on existing routes. In our view, respite is one of the key benefits that the community seeks and, while this is not possible at Gatwick in terms of runway</p>	<p>The Applicant has responded to comments received from Interested Parties regarding concerns that the NRP will use new routes and increase night flights at Section 4.5 and Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The Northern Runway Project does not require airspace change to operate (See CAA airspace change proposal ACP-2019-81). London Gatwick's current airspace design includes Standard Instrument Departures and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The assessment assumes the Night Restrictions imposed by the DfT through the Civil Aviation Act 1982 will continue to limit aircraft movements and noise in the</p>

Topic	Matter Raised	Applicant's Response
	<p>alternation, some respite should be provided at night. We are very conscious of the type of operation at Gatwick which involves making use of aircraft over many hours of the day, in particular resulting in late evening arrivals. We therefore suggest that a night respite period should begin at 0100 hours and continue to 0600 hours, after which the first long haul arrivals and short haul departures can operate</p>	<p>2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be routinely used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport's main runway at the date this Order is made) is not available for use for any reason, as currently is the case. As a result, the total number of people affected by noise at night between 2300 and 0700 with the Project will be less than in the 2019 baseline, see para 14.9.111 in ES Chapter 14: Noise and Vibration [APP-039]. The Noise Envelope proposed with the Project also includes limits on the area of the Leq 8 hour night noise contour to ensure night noise is capped and reduces in future.</p> <p>The expansion of the Airport and increase in movements will also inevitably mean that increases in noise occur, however this does not mean that the benefits of improvements in aviation technology and resultant noise decreases for individual aircraft are not shared with local communities. The noise envelope will capture technological improvements and the noise envelope contours will be reviewed over time to ensure they remain relevant. That review will be based upon past performance, ATM and fleet transition forecasts (so technological advancements in the fleet), any changes to aircraft routings, relevant changes to government policy, and noise modelling forecasts. This, alongside other controls such as the overall cap on ATM's ensures that as benefits arise they are shared with local communities as appropriate.</p>
Greenhouse Gas Emissions	<p>We have noted in Chapter 16 of the Environmental Statement, Greenhouse Gases (APP-041) that future aviation emissions are by far the largest part of the total and, as the trajectory towards net zero occurs and Carbon Budgets reduce, so aviation emissions, while reducing in absolute terms, become increasingly significant as a proportion of the total. We also note that the proposal is to follow the policy that has thus far been applied that the total GHG emissions from aviation are controlled at national level, primarily through the Carbon Budgets. Previous expansion permissions have also been tested in the courts. We do not dissent from this view, but suggest that for the proposals for Gatwick, which are for an NSIP, the result is potential GHG emissions of a sufficient amount that a specific control on growth related to GHG emissions is appropriate. We are confident that the aviation industry and, specifically the manufacturers, the airport operator, the airlines that operate at the airport and all the other associated organisations can achieve reductions in GHG emissions but we recognise that other parties need to be assured that this is</p>	<p>The Applicant's ES Appendix 5.4.2: Carbon Action Plan [APP-091] provides a demonstration that the Applicant is committed to the measures within its control to limit carbon emissions, consistent with planning policy and in some cases in advance of policy.</p> <p>Nevertheless, the Applicant does not control emissions from aircraft in flight and these matters are the responsibility of government. In that context, government has a legal responsibility imposed through the Climate Change Act 2008 to which it has responded fully with the development of comprehensive, up to date policy. It is for government to manage the trajectory of aviation through a basket of measures. In that context, it is for government to decide whether demand management is an appropriate tool to be applied. To date, government has reviewed that issue directly and consistently concluded that demand management is not necessary at this stage. If that position changes, government has made it clear that it will take necessary steps. It is not for this application to pre-judge that decision.</p>

Topic	Matter Raised	Applicant's Response
	<p>the case. Our proposed addition of GHG emissions from all flights departing from the airport will provide this assurance.</p> <p>We therefore propose that the conditions should include a mechanism for relating growth to Scope 1, 2 and 3 emissions and, in particular, emissions from aircraft departures in flight. The detail of how the reduction in GHG emissions should be included in the mechanism should be a matter of negotiation and agreement between the airport and the planning authority and decided through the DCO process. However, in principle, the GHG emissions should be calculated for a baseline period (eg. 2019, or possibly for a multi-year period up to 2019) and then forecast for the periods covered by the Carbon Budgets (for example, specifically for CB6 2033-2037). Initial figures are contained in the Environmental Statement Chapter 16. These two figures should then be expressed as a percentage of the total UK GHG emissions. The control would then be that, if GHG emissions in 2033-2037 remain below the baseline percentage related to Carbon Budget 6, growth can continue. If emissions are above the baseline percentage, further growth would not be permitted. The detailed mechanism for GHG emissions would be similar to that for other conditions, for example in terms of a noise envelope</p>	

18 Cheshire West and Chester Borough Council

18.1.1. Table 18.1 sets out the Applicant's response to the matters raised in the Written Representation from the Cheshire West and Chester Borough Council [REP1-128]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 18.1 Response to Written Representation from Cheshire West and Chester Borough Council

Topic	Matter Raised	Applicant's Response
Land interests	<p>GAL have proposed a Land Swap, as an alternative to a CPO of my clients land, Purple Parking. However, it is proposed that my client acquires a long leasehold interest only of the new site, in exchange for their current freehold interest. This is not a like for like swap and my client will end up with an inferior leasehold interest and lose control, and this will have a detrimental impact to the value of my client's investment.</p> <p>Our second issue is that GAL have stated they will not undertake a valuation of both sites, so we are unsure whether the value of the proposed site will be the same as our current land. This is not giving us comfort that we will acquire a like for like site in the proposed land swap. Another concern is that GAL wish</p>	<p>As set out within Section 3.19 of the Relevant Representations Report [REP1-048], the Applicant has met with Cheshire West and Chester Borough Council on several occasions to discuss commercial terms. These discussions are ongoing, and updates will be issued at the relevant deadlines.</p> <p>The overall proposal of the land swap is for the landowner (Cheshire West and Chester Borough Council) and the tenant (Q-Park Limited) to relocate into brand new facilities in a superior location closer to the airport. The investment value would be enhanced but the Applicant accepted the request to verify using</p>

Topic	Matter Raised	Applicant's Response
	for us to retain part of the existing land and do not want to pay for the EV chargers to be transferred to the new site. In terms of marriage value and efficiency of operation for the tenant's business we need the amenities all retained on one site, therefore this is not acceptable. I hope you will consider this representation against the proposed DCO.	valuations. Points pertaining to leasehold versus freehold, relocation of EV chargers and the mechanism of valuations are still under discussion.

19 Chris Stanton

19.1.1. Table 19.1 sets out the Applicant's response to the matters raised in the Written Representation from Chris Stanton [REP1-130]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 19.1 Response to Written Representation from Chris Stanton

Topic	Matter Raised	Applicant's Response
General	<p>My previous comments to the Planning Inspectorate were made in both a personal capacity and as Chair of Trustees at Surrey Community Action.</p> <p>In each of those submissions I wrote to support the business and local economic case for the Gatwick Northern Runway proposal. I referred to the importance of balancing the economic benefits with protections for the environment. I highlighted more efficient and sustainable aircraft using greener fuels and cleaner engine and airframe technologies as all being essential to Gatwick's long-term future.</p> <p>Immediately north of Gatwick Airport is the Surrey Hills Area of Outstanding Natural Beauty. That is an environmental National Landscape jewel to be protected - not least because Surrey's skies below 10,000 feet are already full of aircraft enroute to or from Gatwick, Fairoaks, Heathrow and Farnborough. At higher altitudes planes overfly Surrey to Luton and Stansted.</p> <p>I believe the Northern Runway proposals to be sound and that they should be approved - provided that there is adequate local infrastructure in place to cope with future demand at Gatwick.</p> <p>However, I think there is another emerging and compelling reason for approving the Northern Runway plan for Gatwick. ...</p>	<p>Support for the Project is noted and welcomed.</p> <p>Further details regarding the Project's commitments in response to greenhouse gas emissions are set out in the ES Appendix 5.4.2: Carbon Action Plan [APP-091], and impacts on nationally designated landscapes in ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033].</p>

Topic	Matter Raised	Applicant's Response
	<p>...As the UAV industry evolves and grows - especially given the CAA's local prominence – I think that is reason enough to approve the Northern Runway proposal.</p> <p>Its capacity will be needed for manned and/or unmanned aircraft - whether we are fighting a war or keeping the peace.</p>	

20 Claire Hunt

20.1.1. Table 20.1 sets out the Applicant's response to the matters raised in the Written Representation from the Claire Hunt [\[REP1-131\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 20.1 Response to Written Representation from Claire Hunt

Topic	Matter Raised	Applicant's Response
Forecasting and Need - Modelling assumptions	Gatwick Airport Ltd has compared environmental impacts against a future baseline of 67 mppa in 2047 but other figures show that it is likely to be 80.2 mppa. i.e. assessment is not against the realistic worst case scenario.	The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to the Environmental Statement [APP-031] , and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42. The Applicant has further explained its

Topic	Matter Raised	Applicant's Response
<p>Noise and Vibration & Water Environment</p>	<p>Future environmental impacts should be no worse than now and assume no car growth and new train services, local congestion and parking impacts in and around Gatwick should not be worse and as well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality.</p> <p>The DCO has highlighted that in some areas the existing impacts are already unacceptable. These should be reduced or eliminated. i.e. no night flights, stronger noise limits and mitigation, impact on sewage overflow incidents and flooding given already poor quality of River Mole.</p>	<p>position in response to ExA question GEN.1.30, The Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Statement [APP-031]. ES Appendix 5.2.3: The Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.</p> <p>In relation to noise, please see the information provided in the Relevant Representations Report Table 4.22.1 in response to the thematic comment <i>Concern about the impact of future increases in levels of noise as a result of the Proposed Development</i>. With regards to noise increase note there is no policy requirement for the Project to result in no noise increase, see Section 2 of ES Chapter 14: Noise and Vibration [APP-039]. The Government's most recent aviation noise policy: the Overarching Aviation Noise policy statement explains:</p> <p><i>"An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits."</i></p> <p>Night flights are controlled by the DfT through the Night Flight Restrictions that the environmental noise assessment assumes will continue. It is also confirmed that the northern runway will not be routinely used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport's main runway at the date this Order is made) is not available for use for any reason.</p> <p>In addition, the Noise Envelope to be introduced with the DCO places noise limits on noise levels during the day and night periods.</p> <p>A new noise insulation scheme is also proposed for the Project and (by default) addresses both the baseline noise impacts environment and the increased aircraft noise exposure changes due to the project.</p> <p>All of the above matters are secured by requirements proposed within the Draft Development Consent Order (Doc Ref. 2.1)</p> <p>Flood Risk</p>

Topic	Matter Raised	Applicant's Response
		<p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account.</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project.</p> <p>Separately to the Project, Gatwick is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, Gatwick does not envisage a scenario when it would develop a new local source of water.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that, with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions</p>

Topic	Matter Raised	Applicant's Response
		<p>with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of</p>

Topic	Matter Raised	Applicant's Response
		<p>the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p>
Section 106 Agreement	<p>Gatwick should agree conditions to limit all these impacts as part of a new Section 106 whether or not the airport is expanded. And ensure surface transport modal shift, public and active transport investment.</p>	<p>The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.</p> <p>The DCO s106 Agreement will only apply to the airport in the event that the DCO is granted and then implemented. The Applicant is in discussions with Crawley Borough Council and West Sussex County Council about a new s106 Agreement that would apply to the airport following the expiration of the 2022 Agreement and prior to the DCO s106 Agreement taking effect.</p>
Climate Change and Greenhouse Gases	<p>Climate change is a significant impact and should be addressed, including emissions from flights. Gatwick would become as big as Heathrow, the single biggest UK climate polluter so it is not true to claim climate impact is not significant. There is a climate emergency and aviation must accept that it has a responsibility to constrain demand at airport level.</p>	<p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed. The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Policy	<p>The existing national aviation policies out of date, specifically with respect to climate change. It should be updated before a decision is made by the Sec of State.</p>	<p>The application has been considered against existing government policy which is not out of date. This examination is required to consider policy as it stands today.</p>

21 Clare Collinge

21.1.1. Table 21.1 sets out the Applicant's response to the matters raised in the Written Representation from Clare Collinge [\[REP1-132\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 21.1 Response to Written Representation from Clare Collinge

Topic	Matter Raised	Applicant's Response
Noise and aviation policy	I oppose the development of the northern runway. It will increase noise and pollution and is not a sustainable project. Heathrow was already selected for development and this is a back door way of over turning that decision	<p>The Applicant has responded thematically to concerns raised regarding noise, air pollution and sustainability within the Relevant Representations Report [REP1-048],</p> <p>Section 4.21 of the Relevant Representations Report [REP1-048], provides further detail of the consideration of policy regarding a third runway at Heathrow.</p> <p>The Applicant does not challenge the Government's selection of Heathrow as the location for a new runway. This application plans to make best use of Gatwick's existing standby runway, which is also in accordance with government policy. To put that into perspective, the third runway at Heathrow was estimated to increase air transport movements by c. 260,000. The NRP is forecast to increase throughput at Gatwick by c.60,000.</p>

22 Cllr Claudia Fisher

22.1.1. Table 22.1 sets out the Applicant's response to the matters raised in the Written Representation from Cllr Claudia Fisher [\[REP1-135\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 22.1 Response to Written Representation from Cllr Claudia Fisher

Topic	Matter Raised	Applicant's Response
General	The Applicant's consistent lack of detail and often incomplete, incorrect and/or missing climate, ecology, environment and transport plans.	<p>The Applicant has submitted assessments as part of the DCO Application on all of these topics – ES Chapter 15: Climate Change [APP-040], ES Chapter 16: Greenhouse Gases [APP-041], ES Chapter 9: Ecology and Nature Conservation [APP-034] and ES Chapter 12: Traffic and Transport [AS-076].</p> <p>The Applicant is unclear which elements the Interested Party considers is lacking in detail or otherwise incomplete/showing errors; but would appreciate further clarification and specific examples where appropriate (to the extent not covered below already) to enable it to provide a response.</p>
Ecology and Nature Conservation	Biodiversity, Ecology and Arboriculture - the Applicant has failed to specify area size so it is impossible to accurately assess the impact of the construction period.	The Applicant is unsure what the Interested Party means by 'failed to specify area size' and would appreciate further clarification in order to provide a response.
Ecology and Nature Conservation	The Applicant has given no assurances that the GAL Biodiversity Action Plan (BAP) will definitely continue.	GAL will continue the implementation of its BAP through the Second Decade of Change programme, regardless of NRP, and reports on the Second Decade of Change annually.

Topic	Matter Raised	Applicant's Response
Ecology and Nature Conservation	Removing trees from Ancient Woodland. This should not be permitted, and more details needs to be supplied	As set out in ES Chapter 9: Ecology and Nature Conservation [APP-034], no ancient woodland is proposed for removal as part of the Project.
Ecology and Nature Conservation	The Applicant needs to ensure that newly created habitats are monitored and reported to the Local Authorities for a 30-year period minimum.	GAL have committed to the management and monitoring of the habitats to be created, as set out in ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan Parts 1 to 4 – [REP2-021], [REP2-023], [REP2-025], and [REP2-027].
Greenhouse Gases	Horsham District Council declared an Climate and Ecological Emergency in June 23 and agreed a Climate Action Plan in January 24 - expansion of Gatwick is directly in contradiction of these HDC policies.	It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.
Greenhouse Gases	The Applicant has not followed agreed methodology and omitted to include Well to Tank (WTT) emissions during the construction period leading to significant under-reporting - this must be corrected and re-assessed as part of the DCO process.	<p>The assessment does not seek either to develop a Corporate Reporting Account for Gatwick Airport Ltd (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project for a full 120 years study period. The methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment as required by IEMA.</p> <p>It is not disputed that Well-to-tank emissions arise in the supply chain for fuels, and methodologies for estimating these (as an uplift to direct emissions) are well established. However, the approach adopted is based on the assessment process which contextualises emissions against a) the UK carbon budget and b) the Jet Zero Strategy.</p> <p>The RICS Guidance on Whole Life Carbon assessment currently in force dates from 2017. The revised guidance will come into force in July 2024. In neither of these is the assessment of User emissions (within Module B8) a mandatory item for inclusion. As such the assessment exercise within ES Chapter 16: Greenhouse Gases [APP-041] (as required by ANPS) captures a larger scope of emissions than is mandatorily required by RICS Whole Life Carbon assessment guidance by including surface access emissions from passengers, and by including emissions from aircraft.</p> <p>With regards to Well-to-tank considerations – this requires some care regarding the inclusion of WTT emissions arising from different sources when considered in the context of the assessment contextualisation within a UK framework.</p>

Topic	Matter Raised	Applicant's Response
		<p>The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years – see https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero legislation. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it was also removed from other aspects of the GHG assessment.</p> <p>However, it is acknowledged that the inclusion of WTT for Construction, ABAGO, and Surface Access would be useful for contextualisation against the UK Carbon Budgets. The WTT emissions for these will be calculated and provided at Deadline 4.</p>
Greenhouse Gases	<p>The Applicant appears to have excluded emissions sources such as maintenance, repair, and replacement during the operational life cycle stage of the Project, with no justification. This must be corrected and re-assessed as part of the DCO process.</p> <p>The Applicant appears not to have applied the WTT to aviation emissions during the operation of the scheme either. This must be corrected and reassessed as part of the DCO process.</p> <p>These omissions, inconsistencies and failures to adhere to globally recognised GHG Protocol Corporate Accounting Standard means the Applicant has under-reported aviation emissions by around 20% - which means roughly 1MtCO₂e being entirely unaccounted for EVERY YEAR throughout the construction period and led to possible omissions, inconsistencies and failures in the aviation emissions stated during the operation period also. This must be corrected and re-assessed as part of the DCO process.</p>	Please refer to the response above.
Baseline for EIA	A failure from the Applicant to accurately assess worst case for environmental impact of surface transport, noise, air pollution and climate change bearing in mind the increase from 40.9 million passengers per annum (mppa) (2023 figures) to 80.2mppa in 2047 while Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, just 1/3 of this increase. Environmental Assessment guidance is that assessment should be against the realistic worst case. This has not been done. The modelling,	The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment (APP-031), and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42. Gatwick would continue to grow if there was no Northern Runway Project. The methodology is based on assessment of with and without development in future assessment years.

Topic	Matter Raised	Applicant's Response
	<p>scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen and future environmental and local impacts should be no worse than now.</p>	<p>In terms of transport and assessing a realistic worst case, this was raised by the Examining Authority at Issue Specific Hearing 4 and responded to at Deadline 1 in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] (Action Point 1). The Applicant has further explained its position in response to ExA question GEN.1.30 (Doc Ref. 10.16).</p> <p>The Applicant has responded to concerns regarding air quality modelling of future years at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance, the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>Noise modelling has been carried out for a 'slower transition fleet' based on Air Transport Movement forecasts in which the rate of fleet transition is delayed by about five years and which would result in higher noise levels than the central case for the same periods. This represents the realistic worst case for noise effects and is set out in ES Chapter 14: Noise & Vibration [APP-039].</p>
Surface Transport	<p>The Applicant should model transport scenarios with no car growth and no worse crowding on the rail network (noting luggage space too). This would mean new train services to/from the airport and potentially between London and the South Coast elsewhere - which are not feasible. Local traffic congestion and parking impacts in and around Gatwick should not be worse.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and rail impacts, at Section 4.26 of its Relevant Representations Report [REP1-048].</p> <p>The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of the Written Summary of Oral Submissions from Written Summary of Oral Submission from Issue Specific Hearing 4: Surface Transport [REP1-059].</p> <p>On the query on luggage space, the Applicant has provided a response in Appendix C (Rail Passenger Modelling Clarification Note) of The Applicant's Response to Actions from ISH2-5 [REP2-005].</p> <p>Section 12.9 of ES Chapter 12: Traffic and Transport [AS-076] and Section 9 of the Transport Assessment [AS-079] provide the outcomes of the assessment of the effects of the Project on train loadings. The assessment notes that the greatest</p>

Topic	Matter Raised	Applicant's Response
		<p>increases in patronage resulting from the Project would occur in the counter-peak direction or in off-peak periods, when trains are less busy. It concludes that seated and/or standing capacity would remain available in all cases and that no mitigation or additional capacity is required.</p> <p>It should be noted that Commitment 8 in the ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] commits the Applicant to providing funding for local authorities to implement effective parking controls off-airport and undertaken enforcement actions. Paragraph 7 of Schedule 3 of the draft Section 106 Agreement [REP2-004] secures a contribution paid by the Applicant to Crawley Borough Council for the purposes of off-airport traffic management and/or parking control and enforcement with the intention of limiting unauthorised parking, deterring rat running and maintaining traffic flow.</p>
Surface Transport	The Applicant has two highway solutions and model a 33% increase in cars which will clearly be unacceptable in terms of increased traffic, air pollution and CO2 emissions - why has it not even considered increasing investment in coach and rail travel?	<p>Comprehensive strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project see Chapters 12 and 13 of the Transport Assessment [AS-079]. Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works that form part of the Project.</p> <p>Chapter 5 of ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out funding commitments towards bus and coach services at Commitments 5, 6 and 7. The routes which have been identified are considered to be those most likely to have greatest influence on mode shares. These improvements have been tested in the strategic transport model to achieve the mode shares assessed as part of the DCO Application. GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other or alternative services if they would result in an equivalent level of public transport accessibility and support achieving the mode share commitments that GAL is making. Paragraph 5 of Schedule 3 to the draft Section 106 Agreement [REP2-004] secures a minimum £10 million investment from the Applicant to support the introduction or operation or use of bus and coach services.</p> <p>The assessment for the Project shows that there would be no significant adverse effects on rail services which would require mitigation. The assessment highlights that rail services are typically busiest northbound towards London in the morning peak, and southbound towards Gatwick in the afternoon peak. In general, the greatest increases in patronage related to the Project will be in the counter-peak direction. The assessment also confirms that the additional loading caused by the Project on the busiest rail services would be small and that there would still be</p>

Topic	Matter Raised	Applicant's Response
		sufficient capacity on those services even with the inclusion of demand from the Project.
General	As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality. The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated.	<p>ES Appendix 5.2.3: The Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, DCO s106 Agreement or other consents and licences.</p> <p>Noise</p> <p>Please see the information provided in the Relevant Representations Report [REP1-048] Table 4.22.1 in response to the generic comment <i>Concern about the current impact of noise from the airport, including night flights.</i> .</p> <p>The project includes a series of noise mitigation measures including an enhanced noise insulation scheme that addresses all areas affected by aircraft noise in the future case with the Project, regardless of whether the project itself would increase those noise levels and as such addresses the total noise effect the airport not only that of the Project.</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account.</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone.</p>

Topic	Matter Raised	Applicant's Response
		<p>Therefore Gatwick does not envisage a scenario when it would develop a new local source of water.</p> <p>Air Quality</p> <p>Please see the information provided in the Relevant Representations Report [REP1-048] Table 4.3.1 in response to the generic comment <i>Concern that quality will worsen as a result of NRP, increasing pollution from airport and road traffic sources.</i></p>
Noise and Vibration	There should be no night flights, stronger noise limits and a mitigation scheme. The ExA needs to make sure these requirements are included in any consent conditions	<p>Night flights are controlled by the DfT through the Night Flight Restrictions that the environmental noise assessment assumes will continue. It is also confirmed that the northern runway will not be routinely used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport's main runway at the date this Order is made) is not available for use for any reason.</p> <p>In addition, the Noise Envelope to be introduced with the DCO places noise limits on noise levels during the day and night periods.</p> <p>A new noise insulation scheme is also proposed for the Project and (by default) addresses both the baseline noise impacts environment and the increased aircraft noise exposure changes due to the project.</p> <p>All of the above matters are secured by requirements proposed within the Draft Development Consent Order (Doc Ref. 2.1)</p>
Water Environment	The Applicant needs to address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding.	<p>Water Quality</p> <p>The Applicant has demonstrated in the ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that with the provision of a new treatment facility the increased capacity mitigates the increased risk of contaminated water being discharged into receiving watercourses. The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>As stated in ES Chapter 11: Water Environment [APP-036] Table 11.8.1, a proposed water treatment facility will be constructed to mitigate the increase in de-</p>

Topic	Matter Raised	Applicant's Response
		<p>icer contaminated runoff as a result of the NRP. The treatment facility could also reduce the discharge from the pollution storage lagoons into Crawley STW. A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Thames Water's Crawley Sewage Treatment Works. It will also discharge at 100l/s to the watercourse rather than the current 65l/s into Thames Water's Crawley STW, and will in effect provide additional dilution compared to the baseline.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary.</p> <p>Section 4 of ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change the status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore the overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Modelling of the wastewater sewer system undertaken to inform the ES Chapter 11: Water Environment [APP-036] demonstrates that with mitigation measures included in the NRP (see Table 11.8.1), Gatwick Airport's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the NRP. The mitigation measures include the reduction in surface</p>

Topic	Matter Raised	Applicant's Response
		<p>water ingress to the wastewater system as a result of the pumping station upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Flood Risk</p> <p>GAL and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the NRP. The model extends approximately 1.5km downstream of the NRP boundary which is considered sufficient to fully assess any potential downstream effects. The Environment Agency reviewed and accepted the updated baseline model that has informed ES Appendix 11.9.6: Flood Risk Assessment [AS-078] in August 2023. The modelling reported in the FRA demonstrates the NRP would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p> <p>The Project does not change the overall surface water drainage strategy for the airfield; there will be no new surface water outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds prior to discharge. The FRA also demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase as a result of the additional storage and attenuations measures included as mitigation in the NRP, see Table 11.8.1 ES Chapter 11: Water Environment [APP-036].</p>
Section 106 Agreement	The Applicant must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts - as part of a new Section 106 agreement regardless of whether the airport is expanded or not. This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights. In particular there should	The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.

Topic	Matter Raised	Applicant's Response
	<p>be examination of the concerning research of Georgia Gamble PhD student at Imperial College, London as can be viewed on a YouTube video titled 'Cohort 2 Presentation Annual Conference 2023 - Georgia Gamble' around the worryingly high levels (currently unmonitored) of toxic volatile particulate matter.</p>	<p>The Draft Section 106 Agreement [REP2-004] will only apply to the airport in the event that the DCO is granted and then implemented. GAL is in discussions with Crawley Borough Council and West Sussex County Council about a new s106 Agreement that would apply to the airport following the expiration of the 2022 Agreement and prior to the DCO s106 Agreement taking effect.</p>
Greenhouse Gases	<p>Climate change is a significant impact and should be addressed as part of the DCO process. The Applicant must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact. Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.</p>	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Greenhouse Gases	<p>There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should not be supported on climate grounds alone. If consent is granted there should be a binding cap on aviation CO2 emissions.</p>	<p>It is for government to determine whether airport growth needs to be capped, as it monitors and enforces the journey to net zero. The Government has stated directly that its modelling to date does not suggest that it is necessary to exercise demand management at airports.</p>
Policy	<p>Outdated national aviation policy - the Secretary of State should accept that the Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018) is now out-of-date, specifically with respect to climate change. This should be updated before a decision is made by the Secretary of State.</p>	<p>This comment is directed at the Secretary of State, rather than at this application. Government policy is being closely monitored by the Department for Transport but has been confirmed as being up to date.</p>
Water Environment	<p>Impacts on over-abstraction in the Sussex North Water Zone need to be addressed by the Applicant - water knows no boundaries. Can the Applicant give legal guarantees in perpetuity that no water shall be extracted from the Hardham site or anywhere within the Sussex North Water Zone? The ExA needs to be forensic in its examination of this vital aspect to ensure that irreplaceable habitats are not endangered by this project.</p>	<p>While the Airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this area. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project.</p> <p>The Airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for the Applicant to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, the Applicant does not envisage a scenario when it would develop a new local source of water.</p>

23 Cllr Georgia Taylor

23.1.1. Table 23.1 sets out the Applicant’s response to the matters raised in the Written Representation from Cllr Georgia Taylor [REP1-183]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [REP1-048].

Table 23.1 Response to Written Representation from Cllr Georgia Taylor

Topic	Matter Raised	Applicant’s Response
Greenhouse Gases	There are no scenarios where an increase in air travel is consistent with the UK climate targets over the next 30 years; and the carbon emissions in the proposal are not calculated correctly or in line with government guidelines.	<p>The Applicant does not agree and neither does the Government. In its Response to the annual report of the Climate Change Committee, in October 2023, the Government explained that:</p> <p><i>“DfT analysis shows that, in all modelled scenarios, we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock on social and economic benefits.”</i> (emphasis added)</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>The assessment does not seek either to develop a Corporate Reporting Account for Gatwick Airport Ltd (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project for a full 120 years study period. The methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment as required by IEMA.</p> <p>It is not disputed that Well-to-tank emissions arise in the supply chain for fuels, and methodologies for estimating these (as an uplift to direct emissions) are well established. However, the approach adopted is based on the assessment process which contextualises emissions against a) the UK carbon budget and b) the Jet Zero Strategy.</p> <p>The RICS Guidance on Whole Life Carbon assessment currently in force dates from 2017. The revised guidance will come into force in July 2024. In neither of</p>

Topic	Matter Raised	Applicant's Response
		<p>these is the assessment of User emissions (within Module B8) a mandatory item for inclusion. As such the assessment exercise within ES Chapter 16: Greenhouse Gases [APP-041] (as required by ANPS) captures a larger scope of emissions than is mandatorily required by RICS Whole Life Carbon assessment guidance by including surface access emissions from passengers, and by including emissions from aircraft.</p> <p>With regards to Well-to-tank considerations – this requires some care regarding the inclusion of WTT emissions arising from different sources when considered in the context of the assessment contextualisation within a UK framework.</p> <p>The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years – see https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero legislation. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it was also removed from other aspects of the GHG assessment</p> <p>However, it is acknowledged that the inclusion of WTT for Construction, ABAGO, and Surface Access would be useful for contextualisation against the UK Carbon Budgets. The WTT emissions for these will be calculated and provided at Deadline 4.</p> <p>It is acknowledged that maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the Carbon Action Plan, specifically regarding to employing PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon</p>

Topic	Matter Raised	Applicant's Response
		<p>approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>Para 16.4.11 of ES Chapter 16: Greenhouse Gases [APP-041] confirms that the assessment considers emissions in terms of CO2e.</p> <p>Para 16.9.4 of ES Appendix 16.9.4: Assessment of Aviation Greenhouse Gas Emissions [APP-194] confirms that the modelling process estimated fuel consumption from aviation, and this was then converted to estimated tCO2e using the appropriate conversion factor. All aviation emissions within the ES are reported to reflect tonnes of carbon dioxide equivalent (tCO2e).</p> <p>Table 5.3.1 in ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions [APP-191] clearly presents the embodied carbon associated with construction of the Project.</p> <p>The reference to use of Streamlined Energy and Carbon Reporting within the submission ignores the references made to several relevant standards and guidance that have informed the assessment of GHG arising from the Project. Para 3.1.5 of ES Appendix 16.9.2: Assessment of Greenhouse Gas Emissions for Airport Buildings and Operations (ABAGO) [APP-192] clearly sets out the approach taken to incorporating different carbon intensities depending on the source of electricity within the modelled energy consumption.</p> <p>It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following:</p> <p><i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK’s overall 2050 net zero target.”</i></p>

Topic	Matter Raised	Applicant's Response
Forecasting and Need	The baseline air transport figures that impacts are measured from are not the present-day figures, but some projected figures in the future. To see the actual impact from today to the proposed future, the impacts all need to be measured from today.	The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment [APP-031], and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42.
Surface Transport	The transport solutions for getting to and from the airport are too car focused and not enough effort has been put into incentivising public transport use and is incentivizing car use.	The Applicant has responded to issues raised regarding incentivizing the use of public transport in its responses to the transport and traffic matters at Section 4.26 of the Relevant Representations Report [REP1-048]. Chapter 5 of ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out funding commitments towards bus and coach services. The routes which have been identified are considered to be those most likely to have greatest influence on mode shares. These improvements have been tested in the strategic transport model to achieve the mode shares assessed as part of the DCO Application. GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other or alternative services if they would result in an equivalent level of public transport accessibility and support achieving the mode share commitments that GAL is making. Paragraph 5 of Schedule 3 to the draft Section 106 Agreement [REP2-004] secures a minimum £10 million investment from the Applicant to support the introduction or operation or use of bus and coach services.
Surface Transport	There is not enough attention given to the road issues beyond Gatwick – especially the A22 and the A264, which both run through villages and are major roads for accessing the East Grinstead and Crawley area from East Sussex.	The Applicant has responded to issues raised regarding additional vehicles through the local area and villages in its responses to the transport and traffic matters at Section 4.26 of the Relevant Representations Report [REP1-048].
General	The ecological, air quality, water quality and other impact on the Ashdown Forest, local rivers, local nature and wildlife, has not been fully considered. The current negative ecological and climate impacts need to be addressed also, and this is not taken into account.	The Applicant has submitted assessments as part of the DCO Application on all of these topics – ES Chapter 15: Climate Change [APP-040], ES Chapter 16: Greenhouse Gases [APP-041], ES Chapter 9: Ecology and Nature Conservation [APP-034] and ES Chapter 11: Water Environment [APP-036].

24 Communities Against Gatwick Noise Emissions (CAGNE)

24.1.1. Table 24.1 sets out the Applicant's response to the matters raised in the Written Representation from CAGNE [REP1-137]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048]. The Applicant has also provided a separate response in relation to the policy points made by CAGNE at **Appendix B** of this document.

Table 24.1 Response to Written Representation from CAGNE

Topic	Matter Raised	Applicant's Response
National Policy	<p>The Government's policy on airport expansion – and specifically airport expansion in the south east of England – is set out in (i) the "Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England" ("ANPS") and (ii) the "Beyond the horizon – The future of UK aviation – Making best use of existing runways" ("MBU") policy statements (both of which were published in June 2018). To the extent that either policy applies (addressed below at §§11-46), the Application does not comply with this policy. That non-compliance is a key issue which the ExA must duly weigh into its decision-making.</p> <p>In addition, to use the wording of s.104 of the PA 2008, this is a case where a national policy statement has effect, namely the National Networks National Policy Statement ("NNNPS"). While, for the reasons set out above, these representations focus on the issue of conflict with the ANPS, following further hearings and questions from the ExA CAGNE may need to make further representations on NNNPS policy.</p>	<p>The Applicant responded to CAGNE's concerns regarding planning and policy within Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant has developed a specific response to the policy points made by CAGNE in its Written Representations, particularly in relation to MBU and the ANPS. In addition, and to address two further specific elements of CAGNE's submission under this topic area:</p> <p>Cumulative effects</p> <p>CAGNE suggest that there has been a failure to carry out a cumulative impact assessment in relation to the third runway at Heathrow. The Applicant has explained its position in response to ExA question CE1.1, Applicant's Response to ExQ1 (Doc Ref. 10.16). In so far as the CAGNE representations refer to the Project's Scoping Opinion, this was issued in 2019 (see paragraph 81 of the representations); and the latest response of the Applicant was addressed in the ES Chapter 20: Cumulative Effects and Inter-Relationships [APP-045] at Table 20.3.1, which explained that "due to uncertainty around the Heathrow Third Runway Project this has not been included in the main cumulative effects assessment". It added, however, that a separate sensitivity test had been included in the chapter at Table 20.7.2. This Table responds to the Scoping Opinion and provided a qualitative assessment, as far as reasonably possible, of cumulative effects with the third runway project.</p> <p>Further legal submissions</p> <p>CAGNE makes further submissions in relation to sections 104 and 105 of the Planning Act 2008. It states that section 104 applies to the highways-related development, in respect of which the NNNPS is in effect. Although it distinguishes the <u>EFW Group case</u>, and accepts that the Project is a single project, it is unclear from part of the representations whether it has concluded that section 104 applies to the application as a whole, including the airport-related development (see para. 101).</p> <p>The representations go on to suggest that because only a small part of this single project is covered by the NNNPS, this in itself means that the application does not</p>

Topic	Matter Raised	Applicant's Response
		<p>accord with the NNNPS; but it is added that the application still falls to be determined, “outside the strictures” of section 104 (para 105).</p> <p>The Applicant has considered the approach to sections 104 and 105 in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15), in which it refers to the current position of the JLAs which also treats section 104 as applying exclusively to the application. It appears from CAGNE's submissions that any alleged failure of the highways-related works to accord with the NNNPS would still require a decision which considers the proposals in the application as a whole, including the airport-related development. It is not clear what is meant by the application being determined “outside the strictures of section 104”, but just as CAGNE suggest that this approach could lead to the refusal of the application, the Applicant assumes that it is advancing a process which could also lead to a consent, having regard to all important and relevant matters including the ANPS.</p>
Noise	<p>The Applicant's overarching approach to noise assessment does not accord with relevant policy. The Application focuses primarily on mitigation, rather than on recognising reduction and mitigation as separate goals. The Applicant has provided no justification for choosing the year 2013 for the noise reduction assessment. The Applicant seeks open-ended flexibility as regards future noise levels, which does not provide the requisite certainty that these will reduce over time. It is also unclear whether the core case assessed in the ES is the “central case” or the “slower transition fleet”.</p>	<p>Appendix 1 to the Written Submission states that ‘<i>the noise documentation appears to rely heavily on the newly released overarching aviation noise policy statement (ANPS), March 2023 but does not consider that previous policy statements remain in force</i>’. This is not the case. Section 14.4 of the ES Chapter 14: Noise and Vibration [APP-039] describes all the relevant previous policy statements from which the impact assessment methodology is drawn and the assessment carried out is in accordance with all existing policies.</p> <p>The environmental statement includes measures to reduce noise and not just to mitigate the effects. For example, road noise barriers are included within scheme as well as a road traffic speed reduction to reduce noise, ground noise barriers are included within the scheme to reduce noise, and air noise will be reduced through numerous measures that will reduce noise from the increased air traffic generated by the northern runway as set out in ES Appendix 14.9.2: Air Noise Modelling [APP-172].</p> <p>Air noise changes are reported with respect to 2013, but this is not used for the assessment of impacts or to target noise reduction measures. Air noise changes are reported with respect to a 2019 baseline. Air noise impacts are assessed primarily by comparing the predicted air noise levels in a given year against the predicted baseline noise levels in that year.</p> <p>ES Appendix 14.9.7 The Noise Envelope [APP-177] sets fixed noise limits for the first 14 years of operation, which provide certainty It will reduce over time. The review process in Section 8 of the Noise Envelope to establish the noise envelope</p>

Topic	Matter Raised	Applicant's Response
		<p>contours after that period will ensure that the noise envelope limits remain relevant.</p> <p>Noise reduction and mitigation measures for the Project are based on the worst case for noise impacts, which is the slower transition case. Appendix 1 to the Written Representation points out that the ground noise assessment in the ES does not take account of the slower transition fleet case, and because of this asks which fleet has been assumed in the assessment overall. Ground noise has now been assessed for the slower transition fleet as reported in Appendix B – Ground Noise Slower Transition Fleet Assessment of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13).</p>
Air Noise	<p>In terms of air noise specifically, Suono have identified key deficiencies in the ES under the following headings:</p> <ul style="list-style-type: none"> a. Forecasts: The Applicant has not responded to PINS' scoping response requirements in terms of forecasts and has not set out baseline assumptions clearly. This has prevented proper review of the contribution of different aircraft to overall noise conditions in affected communities. b. Methodology: Issues with the Applicant's methodology include failure to refer to the noise intrusion criteria for schools; underestimating the likelihood of awakening by only assessing airborne (and not ground-borne) aircraft; and inexplicably not determining significant effects using secondary metrics. c. Model/Results: The Applicant's model is unclear as to how noise adjustments for next generation aircraft have been determined; assumptions on runways and flightpaths are either not explained or lack necessary information; and the assessment results include inconsistencies and are inadequately explained 	<ul style="list-style-type: none"> a. The applicant has provided details of the numbers of flights as requested by PINS in the ES. However, breakdowns of the aircraft types making up the central case fleet and the slower transition fleet in the various assessment years are now provided in Appendix F – Aircraft Fleets for Noise Modelling of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13). b. The ES reports the largest noise increase at any school from the Project is 1.4dB L_{Aeq} 16 hr. Because of the nature of the Project, in particular it will not change the fleet of aircraft or require new flight paths, noise levels measured over shorter periods of time, such as those referenced in BB93 Building Bulletin 93: acoustic design of schools – performance standards will also not increase by more than about 1.4 dB L_{Aeq}, so significant effects on schools from the Project are not expected, and the scoping criterion of L_{Aeq} 16 hr 51dB for considering schools for noise insulation is considered appropriate. Any school coming forward to be considered for noise insulation under the scheme will be fully assessed using appropriate noise standards including measurements over shorter periods if appropriate. The physiological sleep disturbance assessment see ES Appendix 14.9.2: Air Noise Modelling [APP-172] uses the awakenings dose response from the WHO commissioned systematic review of aircraft noise, not ground noise which is different in character and in particular, ground noise is less peaky and is assessed separately. Appendix 1 to the Written Representation refers to evidence submitted to the Luton Public Inquiry by a member of GAL's Project team stating that criteria for assisting in determining levels of significance within secondary metrics have not been provided. Secondary metrics are generally assessed based on population size and scales

Topic	Matter Raised	Applicant's Response
		<p>for the number of people affected, and are provided in paragraph 14.4.74 of ES Chapter 14: Noise and Vibration [APP-039].</p> <p>c. The noise adjustments for next generation aircraft were derived by the CAA Environmental Research and Consultancy Department (ERCD) for their ANCON noise model, as were other features of the noise model. Assumptions on flight paths are given in ES Appendix 14.9.2: Air Noise Modelling [APP-172]. Runways and aircraft numbers are now provided in Appendix F – Aircraft Fleets for Noise Modelling of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13). The appendix to the Written Representation suggests there are inconsistencies where noise contour areas may for example go up but the population be unchanged. This may be simply because populations provided by ERCD are rounded to the nearest 50 or 100, or it may be where the population density varies so a larger contour may cover less populated areas. In the example given the contour areas are both 2.7km² rounded to the nearest 0.1km² so the area rounding may also lead to the apparent discrepancy. The contours can be viewed in the online air noise viewer to allow direct comparisons to be made. The technical appendix to the Written Representation queries why the Leq noise changes at Charlwood Infant School appear small compared with the changes in N65 day and N60 night. The description of the noise changes expected at this Community Representative Location are described in paragraph 14.9.253 of the ES Appendix 14.9.2: Air Noise Modelling [APP-172], although this paragraph refers to the slower transition fleet whereas the technical appendix to the written representation quotes the central case fleet example. However, the explanation is the same. Whilst the number of Lmax events about 65 dB during the day will increase with the Project in 2032 compared to the 2032 baseline as reported, the noisiest aircraft with Lmax levels above 65 dB by the greatest extent are from the larger aircraft that will remain on the main runway, thus having a smaller effect on Leq levels which sum all aircraft noise, in Charlwood.</p>
Ground Noise	<p>Similar concerns arise in relation to ground noise:</p> <ul style="list-style-type: none"> a. Forecasts: As with air noise, there has been a failure to respond fully to scoping. b. Methodology: Critical information is missing from the ES; the methodology departs from the approach taken to other UK airport expansions, preventing proper assessment of air and ground noise together; use of background noise 	<ul style="list-style-type: none"> a. Please see the response to a) above. b. There is no guidance on ground noise modelling at UK airports and the Applicant has developed a detailed noise model based on details of airport operation and noise from taxiing aircraft measured at the airport for the purpose of this study. This may be different from other airports, but it is considered very detailed, and fully fit for purpose. ES Appendix 14.9.3: Ground Noise Modelling [APP-173] provides full details of the model inputs and surveys results. The Appendix to the CAGNE response requests

Topic	Matter Raised	Applicant's Response
	<p>measurements from 2015 as a proxy for 2019 values is not appropriate; and there has been a failure to include worst-case wind conditions.</p> <p>c. Model/Results: Suono identify various deficiencies in the information about proposed mitigation and errors in the model and results. For example, the ES adopts an incorrect year for the "worst-case" scenario (2047 not 2032) and applies a misleading assumption of equivalence between car pass-bys and engine ground running noise.</p>	<p>further details on ground running splits across locations. This is now provided in Appendix E – Ground Noise Engine Ground Runs of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13). The use of ground noise contours has been discussed with the topic working group, where the Applicant has explained that ground noise contours do not necessarily depict areas of significant effect because the ground noise assessment also considers ambient noise and change above it. However, the Applicant has produced a report on ground noise effects with the slower transition fleet and in this includes ground noise contours as requested, see Appendix B – Ground Noise Slower Transition Fleet Assessment of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13). The ground noise assessment has used the baseline survey carried out in 2016 which reasonably represented the noise baseline in 2019 because conditions in the area changed little over this period as has been discussed and agreed with the Local Planning Authorities in the noise Topic Working Group. The question on wind conditions was raised verbally in Issue Specific Hearing 5 and the Applicant explained a reasonable worst case scenario was assumed in 10.9.7 The Applicant's Response to Actions - ISHs 2-5 [REP2-005]. In relation to methodology, the Appendix to the CAGNE Written Representation also requests information about the use of L_{max} in the assessment. For ground noise, the L_{max} is used as a secondary metric rather than the number above metrics that are used for air noise and threshold criteria are provided at paragraph 14.4.84 of the ES.</p> <p>c. There are five points relating to ground noise that are raised in the CAGNE Appendix, under the heading of 'Assessment results' and these cover the two examples that are provided in the main text of their written representation. The five points within the CAGNE appendix are listed in consecutively numbered paragraphs from 4.20 through to 4.24 and each is addressed in turn below:</p> <ol style="list-style-type: none"> 1. The first point (4.20) notes that the Applicant has focused the ground noise assessment on the worst-case assessment year of 2032 quoting a statement describing this from within the ES. It is considered that this statement holds true and that 2032 is the worst-case assessment year. 2. The second point (4.21) contends that worst-case should be defined by the greatest noise change which does not occur in 2032. The Applicant does not agree with this statement and considers that the

Topic	Matter Raised	Applicant's Response
		<p>worst-case is defined by the '<i>highest combination of predicted noise levels and noise change for development scenario</i>' as noted at paragraph 14.6.28 of ES Chapter 14: Noise and Vibration [APP-039].</p> <ol style="list-style-type: none"> 3. The third point (4.22) queries why higher L_{Amax} results occur during the night than during the day under some scenarios. This is due to the change in operation of the taxiways during the night whereby the north runway will be used for taxiing in line with the current operation of the airport. 4. The fourth point (4.23) contends that predicted EGR L_{Amax} levels at Rowley Cottages cannot be compared with car pass-bys at this location. Whilst it is acknowledged that EGR noise exhibits a different character to that of an individual car pass-by, the Applicant disagrees with this point as there are other elements of context to take into account. EGR noise at these high levels would only occur very sporadically during daytime hours and the number of car pass-bys from the dual carriageway is high enough on this stretch of the A23 to be considered a more-or-less continuous noise source. Given the frequency of occurrence of EGR noise in the context of very high levels of road traffic noise, it is considered that EGR noise would have a negligible effect at this assessment location. 5. The last point (4.24) contends that APU, EGR and EAT usage have the potential to cause '<i>a material worsening of the noise climate</i>' during the night hours. ES Chapter 14: Noise and Vibration [APP-039] has assessed APU usage (see paras 14.9.217- 14.9.218). The assessment has considered L_{max} and L_{eq} noise modelling results and has shown the contributions of maximum noise levels from APU, EGR and EAT usage are either negligible or occur infrequently enough that they are insignificant in comparison to taxiing aircraft. The Applicant is confident that APU usage will not increase materially and procedures are in any case in place at the airport which limit the use of APUs with the aim of using Fixed Electrical Ground Power wherever possible. Compliance monitoring is conducted by the airport to ensure that APU usage is kept to an absolute minimum. Due to the proposed airport operation whereby the northern runway would be used as a taxiway during the night hours (as per current operation), EAT usage would not be necessary and it should be noted that the construction of the EATs is to facilitate the dual runway

Topic	Matter Raised	Applicant's Response
		<p>usage during the day. Appendix E – Ground Noise Engine Ground Runs of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13) highlights the fact that there is a Gatwick Airport Directive which prohibits EGR testing from occurring at night.</p>
Road Noise	<p>In terms of road noise, problems with the Applicant's assessment include deficiencies in the surveys (a 1-hour survey cannot validate the model), and failure to explain why surface access noise results were compared against the ground noise study area.</p>	<p>With regards baseline surveys, the purpose of the one hour surveys reported in the Riverside Garden Park in ES Appendix 14.9.4 was not to validate the road traffic noise model but to gain an understanding of the park environment, as clarified in the noise topic working group. Validation of the traffic noise model is now reported in Appendix D – Traffic Noise Important Area Assessment of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref. 10.13). Section 8 of ES Appendix 14.9.3: Ground Noise Modelling [APP-173] refers to Figure 14.6.33 when comparing predicted levels of ground noise with the existing traffic noise levels presented in that figure.</p>
Noise Envelope	<p>As to the noise envelope, Suono question the extent of the limit values used. They also note that it is unclear how the Airport proposes to monitor performance to achieve contour limits</p>	<p>The appendix to the Written Representation notes that the noise envelope limits set in terms of the day and night noise LOAEL contour areas, and suggests in addition to these limits could be set at higher noise control levels such as the day and night SOAELs to address the possibility of the unexpected consequence of increasing noise at these higher levels. This was discussed in the noise envelope group and it was concluded that because the SOAEL contours are close to the airport, options for varying aircraft operational procedures are very limited and so this unexpected consequence would not happen.</p> <p>The Applicant will develop the system for managing compliance and reporting in the annual Noise Monitoring and Forecasting Reports as described in Section 7 on the ES Appendix 14.9.7: The Noise Envelope [APP-177]. DCO requirements will require those to be produced and to include the relevant forecasting and monitoring information, and that information will be subject to independent review and verification by the CAA, so CAGNE can therefore have confidence that monitoring will be undertaken effectively.</p>
Noise Insulation Scheme	<p>Remarkably, the proposed noise insulation scheme would lead to reduced funding and insulation choice at a number of locations, with funding proposed also materially lower than current best practice. Further, the Applicant's proposal for insulation, suggesting only acoustic ventilators, is likely to create problems with overheating in affected properties. To comply with policy and best practice, the Applicant should update the scheme to ensure</p>	<p>The Applicant has responded to CAGNE's concerns regarding the NIS within Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>The applicant has prepared an update note on the noise installation scheme ES Appendix 14.9.10: Noise Insulation Scheme Update Note [REP2-031] at Deadline 2, that clarifies the ventilation that will be offered to address overheating, how the scheme will be implemented, and other details of the product to be</p>

Topic	Matter Raised	Applicant's Response
	that all residents receive a better offer than currently available, as well as removing the upper funding cap and widening its Application.	provided. The sums to be offered within the three parts of the Outer Zone have been further considered to ensure that, whilst the scheme is more generous overall, no one would receive a lower sum than the recently updated offer in the current scheme i.e. £4,300 plus VAT. An update to the NIS will be provided.
FASI-South	In addition to the findings of Suono's expert report, another key concern for CAGNE is that modernisation of airspace (Future Airspace Strategy Implementation South or "FASIS") will be necessary if the NRP is to go ahead. At the very least, it is realistically possible that FASIS will be necessary, meaning it should have been considered and assessed. However, Gatwick has not included in the noise envelope any modelling of either (a) a future scenario in which airspace modernisation goes ahead, or (b) a future scenario in which airspace is not modernised and congestion then gives rise to a need to use alternative routes. Suono will further address the question of flightpaths in its representations for Deadline 2.	The Applicant has responded to CAGNE's concerns regarding FASI-S within Section 3.24 of the Relevant Representations Report [REP1-048] .
Policy: Transport Policy Framework	<p>The Applicant has applied the transport policy framework inconsistently. For example, the Transport Assessment fails to establish a formal hierarchy of travel modes. Key guidance has not been quoted or engaged with, including:</p> <ul style="list-style-type: none"> a) Department for Transport ("DfT") Circular 01/2022, which replaced Circular 02/2013 in December 2022, in advance of the Application being made. b) The Williams/Shapps Review of the Rail Industry, which confirms the Applicant will have no/limited influence on delivery of rail services. c) Bus Back Better and the West Sussex BSIP, which set out an approach to bus priority provision that has been ignored by the Applicant. d) Gear Change – National Cycling and Walking Strategy 202036 and the West Sussex LCWIP. 	<p>Department for Transport ("DfT") Circular 01/2022 addresses the ways in which National Highways will engage with other parties to assist delivery of sustainable development and includes National Highways' approach to forming new connections to and capacity enhancements to the Strategic Road Network (SRN). The Applicant has held extensive engagement with National Highways about the Project and National Highways' approach will have been informed by the Circular</p> <p>Rail services – While the Applicant cannot directly control the delivery of rail infrastructure and services planned by others, it is reasonable and in accordance with guidance in DfT Transport Appraisal Guidance that known and committed proposals for rail infrastructure or services are included in the future baseline models if they are sufficiently certain. The Applicant has consulted with Network Rail about future rail proposals as part of developing the Uncertainty Log which informs the strategic transport models. As the assessment shows that no mitigation is required in relation to rail capacity, the Applicant is not reliant on other parties in that regard.</p> <p>Bus Back Better and the West Sussex BSI: the Applicant has considered whether bus priority measures would be necessary within the highway works which form part of the Project and has concluded that, given the works lead to significant improvements in the performance of the network in the vicinity of the Airport, and a corresponding improvement in journey times, bus priority measures are not</p>

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		<p>required. The Applicant has committed to provide funding to support implementation of new or enhanced bus services as part of ES Appendix 5.4.1: Surface Access Commitments [AS-090]. Those commitments also include the Sustainable Transport Fund, which could be used to support bus priority measures in the wider area if it is appropriate to do so at a future date.</p> <p>Gear Change – National Cycling and Walking Strategy 202036 and the West Sussex LCWIP. Policy in relation to walking and cycling has been considered as part of preparing the design of the Project highway works, which include new and improved active travel infrastructure provision. This draws upon proposals in the Crawley and Reigate and Banstead LCWIPs, guidance in Local Transport Note 1/20 and a review of a number of options for active travel infrastructure prior to producing the design for the Application.</p>
<p>Surface Transport: Limitations of Transport Modelling</p>	<p>The Applicant's traffic modelling is strategic in nature, with no detailed analysis of the local traffic conditions that would be adversely affected beyond the immediate environs of the airport. Irrespective of this, mitigation proposals are limited and do not address operational resilience of the M23. Due to flaws and limitations in the modelling, the Applicant has not provided a comprehensive traffic impact picture.</p>	<p>The transport modelling covers a large area which includes all roads in neighbouring Districts, as indicated in Diagram 5.3.3 of the Transport Assessment [AS-079]. An assessment of the magnitude of impact of the Project was undertaken across the modelled area to understand the impact of the Project on junctions and links within the model. This process is outlined in ES Chapters 5: Project Description [REP1-016] and in ES Chapter 12: Traffic and Transport [APP-037] and in section 6.12 of Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] of the Transport Assessment. The assessment results are presented in Section 12.8 of Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]</p> <p>Locations across the modelled area that were identified as experiencing an impact (as defined by the criteria set out in Table 12.4.6 of ES Chapter 12: Traffic and Transport [AS-076]) were investigated in further detail to understand whether the impact would lead to a significant adverse effect that would require mitigation. The outcomes are set out in the relevant parts of Section 12.9 of ES Chapter 12: Traffic and Transport [AS-076].</p>
<p>Surface Transport: Strategic Transport Model</p>	<p>The log of schemes has not been corrected following the 9th of March 2023 Written Ministerial Statement on the roads investment programme, nor has it included the latest DfT traffic forecasts and growth factors, which were available before submission. The validation reporting is not sufficiently comprehensive to allow a definitive view to be drawn on its accuracy and reliability. Furthermore, the Applicant's analysis does not consider either the known peak hours of airport operations (0430 to 0600) or impacts</p>	<p>The transport modelling follows DfT's Transport Appraisal Guidance advice relating to the treatment of growth. At the time the transport modelling was undertaken the assumptions regarding infrastructure schemes certainty were detailed and are presented in Chapters 6 to 8 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]. The latest version of DfT traffic forecasts was released in August 2022 after the strategic transport modelling was completed for the application.</p>

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	<p>on the dispersed parking offer prevalent at the airport. The modelled hours present an inconsistent set of time periods that may mask the full extent of traffic issues. The model also misses local links that provide routes to the airport and may be adversely affected.</p>	<p>Due to the Examining Authority making a Procedural Decision dated 24 October 2023 to request the Applicant to look at accounting for COVID-19 in the transport modelling, sensitivity tests have been undertaken which have also looked at changes in infrastructure assumptions and DfT forecasts. These are presented in Accounting for Covid in Transport Modelling [AS-121].</p> <p>The strategic transport demand model covers a 24 hour period, including the early morning period. The strategic highway model reports on the morning and evening peak periods and daytime interpeak. At other times of day, overall traffic flows are generally lower and there is more unused capacity available in the network.</p>
<p>Surface Transport: Local Transport Model</p>	<p>The local traffic model is limited in scope and has required significant manipulation to ensure a suitable level of convergence. The “with scheme” scenarios perform well in terms of vehicle throughput, delay and journey time. Given the concentration of highway mitigation in the modelled area this is unsurprising. However, the model fails to take into account the operational situation at junctions and links further afield.</p>	<p>The highway impacts reported in the Application are assessed using a combination of a strategic highway model and a local VISSIM model. The strategic highway model covers the wider road network covering key local routes and junctions broadly between south London and the south coast and between (and including) the A22 and A24 corridors. The model was validated with a series of journey time routes (21 in total) covering key corridors by time period including the A217, the A23 through Horley and the M23 Spur. Traffic flow validation was also undertaken along these corridors. This provides a level of robustness on the ability of the strategic highway model to provide an assessment of effects and provides a representation of the interactions of different junctions in the system, including the operational situation at junctions away from Gatwick. The VISSIM modelling has been used to assess the impact of Airport traffic in the immediate vicinity of the Airport and to understand the network operation where airport and non-airport traffic is most concentrated. Demand from the strategic models feed directly into the VISSIM models, and as such impacts outside the extents of the VISSIM model are consistently addressed in the strategic modelling.</p>
<p>Surface Transport: Do-Minimum Traffic Levels</p>	<p>The revised Transport Assessment (AS-079 and AS-080) errs in its approach to the growth factors applied to reach the “do minimum” traffic levels for 2029, 2032 and 2047. While the DfT expects scenario-based testing to deal with uncertainty, the Applicant has applied a formulaic single central forecast.</p>	<p>The transport modelling follows DfT’s Transport Appraisal Guidance advice relating to the treatment of growth and develops a core transport modelling scenario based on DfT growth forecasts that were available at the time the modelling was undertaken.</p> <p>The DfT’s guidance around testing of scenarios to deal with uncertainty relates to transport modelling for business case development and details that a proportionate approach is necessary, including the use of sensitivity studies. Therefore, specific sensitivity tests were undertaken to look at developments within the vicinity of Gatwick which are less certain and have not been included in the future baseline as local stakeholders indicated that they wish to understand the potential cumulative traffic and transport impacts of these developments. These are reported</p>

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		<p>in section 14 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]. Furthermore, the influence of COVID-19 on travel demand is also considered and reported in Accounting for Covid in Transport Modelling [AS-121].</p>
<p>Surface Transport: Transport Movements from CARE Facility</p>	<p>The Applicant has also still not properly assessed the impact of the change to a non-incinerating waste disposal plant, which will undoubtedly affect traffic levels.</p>	<p>Table 4 of the Change Application Report [AS-139] sets out the traffic and transport considerations for the Central Area Recycling Enclosure (“CARE”) facility. The Project change would not materially increase the number of construction or operational trips. The volume of operational vehicle trips associated with the proposed replacement CARE facility is expected to be very small, at fewer than six vehicle trips a day.</p>
<p>Surface Transport: Rails Capacity Assumptions</p>	<p>As to specific modes, the Applicant’s analysis is predicated on rail being the principle non-car mode of access for passengers and staff. That analysis fails to consider capacity issues in detail or to acknowledge that the Airport has no or limited influence on the rail timetable, which is controlled by Government with no contractual certainty beyond 2025. The lack of east-west rail connectivity and the fixed hours of operations, which are restricted by Network Rail’s engineering requirements, are further concerns given the proposed staff catchment areas. In all, the Applicant has failed to demonstrate that its rail proposals are achievable.</p>	<p>Rail capacity is included within the modelling and analysis presented in the Application. This adopts DfT based assumptions on train capacity and timetabling agreed with Network Rail. This was further tested in Comments on Accounting for Covid in Transport Modelling [AS-121] where rail services were revised to meet the current expectations of Network Rail. Further details regarding the rail modelling and assessment of rail capacity have been provided in The Applicant’s Response to Actions from ISH2-5 [REP2-005], including at Appendix C to that response: Rail Passenger Modelling Clarification Note. This includes the assessment criteria for passengers standing in section and funding for rail mitigation in Section 8.</p>
<p>Surface Transport: Bus/Coach Commitments</p>	<p>In terms of bus/coach, the Applicant assumes that market forces will dictate service delivery, which again fails to provide any certainty that the mode share target can be achieved. The Transport Assessment evidences Gatwick’s lack of control over bus/coach and lack of commitment to levels of service and funding.</p>	<p>As set out in paragraph 5.2.1 of ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090], the Applicant has an established approach for enhancing the public transport network serving the airport via its Sustainable Transport Fund (“STF”), which is set out in the Applicant’s current Section 106 Agreement, and for working with local and regional bus operators. The STF provides financial support to services ensuring 24/7 access from local areas and has previously supported services to East Sussex, Surrey and Kent. Commitments 5 and 6 of the SACs set out that the Applicant will be providing financial support to enable the services identified, or others which result in an equivalent level of improve public transport accessibility, to sustain their operation and promote their use for a minimum of five years. This is secured in the draft Section 106 Agreement [REP2-004]. The routes identified are based on analysis of passenger and staff journeys to and from the airport, and the services are aimed to serve locations have significant trip making but relatively low public transport mode share. These routes form part of the set of interventions that the Application is proposing in order to achieve the mode share commitments and those interventions have been included in the transport modelling that supports the Application.</p>

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Surface Transport: Sustainable Transport Mitigations	The proposed sustainable transport mitigations are limited in scope and local in nature. The Applicant's uncertain position as regards incentives and active travel measures has led to an undefined and unfunded future surface access strategy, which cannot provide confidence that sustainable travel targets would be delivered. Concerns over the Applicant's commitment to advance active travel and public transport were raised by a number of parties at ISH4 and ISH2.	<p>The Applicant is committed to supporting sustainable travel, as set out in ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090]. The mode share commitments within the SAC represent the position the Applicant is committed to achieve, based on the modelling of mode choice and transport network operation, to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport [AS-076] and in the Transport Assessment [AS-079] are delivered. The SAC also sets out committed interventions. There are further aspirations identified in the SAC which acknowledge that there may be further opportunities to enhance the use of public transport services. In parallel, the Applicant will maintain the operation of the Sustainable Transport Fund to support measures that will help to encourage further shift to sustainable travel modes and this is secured in the draft Section 106 Agreement [REP2-004].</p> <p>The Applicant has responded thematically to comments made within relevant representations regarding active travel connections being improved beyond what is currently proposed by the scheme at Table 4.26.1 of the Relevant Representations Report [REP1-048].</p>
Air Quality – Ultrafine Particles	The AQA fails to assess adequately the impact of the NRP on ultrafine particles ("UFP"), for which PM2.5 is not a good proxy. Evidenced health effects of UFP include increased cardiovascular ischemic heart disease and pulmonary mortality. Whilst there is insufficient information to quantify fully the impact of aircraft on UFP emissions, increasing airport activity is likely to increase emissions in nearby residential areas, such that some qualitative or quantitative assessment should have been carried out.	<p>The Applicant has provided a response to CAGNE's concerns relating to ultra-fine particulate matter (UFPs) at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>An assessment of UFPs has been undertaken and is reported in Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043].</p>
Air Quality – Estimates of emissions, dispersion modelling, and modelled NO2 concentrations	<p>The AQA fails to take proper account of uncertainties relating to estimates of emissions, dispersion modelling, and modelled NO2 concentrations.</p> <p>a) No comparison of the modelled and measured PM10 or PM2.5 concentrations has been provided, such that reliability of the predicted data is unclear. Given acknowledged uncertainties, the 2040 target (as opposed to the interim 2028 target) or a linear interpolation should have been used for PM2.5 concentration modelling in 2029, 2032, and 2038.</p> <p>b) Estimated aircraft Nox emissions are based on uncertain assumptions, limited data and incomplete information.</p>	<p>a – The Applicant has provided a response to CAGNE's concerns relating to PM_{2.5} comparison of modelled and measured data at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>Paragraph 13.5.34 and Table 13.5.3 of ES Chapter 13: Air Quality [APP-038] considers the updated PM_{2.5} future standard within the context of the ES assessment.</p> <p>b – The Applicant has provided a response to CAGNE's concerns relating to robustness of the assessment at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>C - The impact of the presence of buildings on stability of the atmosphere was considered in the dispersion modelling using the Monin-Obukhov length model</p>

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	<p>Further, the considerable uncertainties regarding airport emission inventories and how those impact the robustness of assessments do not appear to have been adequately considered in the AQA.</p> <p>c) Issues with the dispersion modelling include failure to consider effects of the presence of buildings and other barriers on dispersion of emissions.</p> <p>d) APS has concerns with the Applicant's verification of modelled NO2 concentrations. The correlation co-efficient was poor for several monitoring sites (indicating that the model is not representing reality well) and was negative in three zones (which means that as measured concentrations decrease, the modelled concentration increases, indicating poor performance of the model).</p> <p>e) There are also flaws in the Applicant's analysis of hourly mean NO2 standard exceedances, which should have been based on airport measurements rather than locations where road traffic is the dominant source of NO2.</p>	<p>parameter. The Project is not expected to alter dispersion of pollutants at receptor locations from building effects. The dispersion modelling set-up follows Defra LAQM Technical Guidance (TG22) and was agreed with local councils at the modelling methodology workshop in November 2022. Full details of the model methodology are included in ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. Full details of the verification process are included in Section 3 within ES Appendix 13.6.1: Air Quality Data and Model Verification [APP-159].</p> <p>d - The Applicant has provided a response to CAGNE's concerns relating to model verification at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>e – The Applicant has provided a response to CAGNE's concerns relating to short-term assessment of impacts at Section 3.24 of the Relevant Representations Report [REP1-048]. In addition the Applicant has responded to concerns relating to short-term assessment of impacts at 2.2.2.3 of the Statement of Common Ground between Gatwick Airport Limited and Tandridge District Council [REP1-046].</p>
Air Quality – Approach to analysis of significance	<p>APS questions the Applicant's approach to analysis of significance. The air quality impact at human receptors in all future "with NRP" scenarios (including the construction scenarios) are predicted to be not significant. However, it is unclear how the assumptions, limitations and uncertainties of the modelling have fed into these judgements on significance.</p>	<p>The Applicant has provided a response to CAGNE's concerns relating to confidence in results at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>Section 13.6 in ES Chapter 13: Air Quality [APP-038] describes the assumptions and limitations and sets out the conservatism included in the assessment which has been adopted to provide a reasonable worst-case assessment, with further details set out in Section 7 of the ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. Sensitivity tests have also been undertaken to further inform the assessment conclusions, provided in ES Appendix 13.9.2: Air Quality Sensitivity Tests [APP-168]. The approach taken is considered to provide a robust assessment based on the data available.</p>
Air Quality – Operational particulate matter emissions	<p>No proper consideration has been given to operational particulate matter ("PM") emissions from the wear of the runway/roads, re-suspended dust, or the wear of the brakes and tyres. The assessment should not rely solely on modelled data but should consider the methodology and its uncertainties in the round when determining the magnitude of effects.</p>	<p>Aircraft particulate matter emissions from aircraft bake and tyre wear have been assessed and are set out in Section 3.6 of the ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. Assumptions and limitations of the air quality methodology are set out in Section 7 of ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158].</p>

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Air Quality – National Emissions Ceiling Regulations 2018	To understand the contribution of the airport to national emissions, the AQA should have addressed the National Emissions Ceiling Regulations 2018.	The Applicant has provided a response to CAGNE's concerns relating to the ceiling regulations at Section 3.24 of the Relevant Representations Report [REP1-048] .
Air Quality – Impact on other assessments	More generally, APS are concerned that a series of assumptions made at various stages of the AQA generates a lack of confidence that there will be no significant impacts. The consequences of these omissions and errors flow beyond the air quality modelling to other parts of the ES. For example, the Health and Wellbeing chapter has concluded that the UPF effect will not be significant, relying on the AQA	<p>The Applicant has provided a response to CAGNE's concerns relating to confidence in results at Section 3.24 of the Relevant Representations Report [REP1-048].</p> <p>Section 13.6 in ES Chapter 13: Air Quality [APP-038] describes the assumptions and limitations and sets out the conservatism included in the assessment which has been adopted to provide a reasonable worst-case assessment, with further details set out in Section 7 of the ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. Sensitivity tests have also been undertaken to further inform the assessment conclusions, provided in ES Appendix 13.4.1: Air Quality Sensitivity Tests [APP-168]. The approach taken is considered to provide a robust assessment based on the data available.</p>
Socio-Economics – Housing	<p>CAGNE has also produced its own Jobs Creation and Housing Markets Report (January 2023), which concludes that Gatwick's lack of workers is already causing major operational issues and will make a two-runway operation untenable. This accords with the findings of the Airport Commission from 2015. Key factors include poor rail links, nearby local authority areas having comparatively low levels of unemployment, and competition with Redhill Hospital for staff.</p> <p>The jobs offered do not allow workers to afford to live locally without the assistance of local authorities and affordable housing, of which there is a definite lack in areas surrounding the Airport. Indeed, Crawley Borough Council very recently in February 2024 declared a housing emergency.</p> <p>The applicant's assessment of housing and population relies on old data. They should be using up-to-date information, given it will impact on labour supply and housing conclusions.</p>	<p>ES Appendix 17.9.3 Assessment of Population and Housing Effects [APP-201] demonstrates that even under very conservative assumptions for housing and labour market growth, there will be sufficient growth in the number of working age residents across the area to cope with growth at Gatwick as well as forecast growth in other sectors.</p> <p>The Applicant has commented on the declaration of a Housing Emergency by Crawley Borough Council within the Applicant's Response to Actions ISH2-5 [REP2-005], in response to ISH3 Action Point 4, and has provided a position on housing need during the construction phase based on updated data within ISH3 Action Point 5. It should be noted that the assessment based on the updated 2021 Census data does not alter the original conclusions drawn within ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].</p>
Socio-Economics – Job creation	CAGNE also questions the Applicant's suggestion that much of the forecast job creation will come from Gatwick's planned significant growth in freight. Gatwick's planes are 90% short-haul, which do	The estimate of new jobs on the airport is set out in Table A1.1.1 of ES Appendix 4.3.1: Forecast Data Book [APP-075] . This takes account of productivity improvements and includes jobs at a range of skill levels. It also shows that the

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	<p>not carry cargo. Any freight would also have to be moved via the M23, as the railway cannot take freight.</p> <p>The types of jobs being offered in volume tend to be low-skilled, at both Gatwick and associated businesses.</p> <p>As of October 2023, Gatwick is still struggling to fill construction roles, so we question how they will fulfil the requirement for 1,400 jobs for construction of the new runway.</p> <p>There has been no separation of the tourism brought in directly by Heathrow (from where central London is easily accessible) and that of Gatwick (being based further out with poor transport links to the capital).</p> <p>It is therefore hard to see what economic benefits actually filter out to the regions (as detailed by Crawley Borough Council) vs London's dominance in attraction.</p>	<p>jobs will come from a range of activities on the airport of which cargo is a relatively small part.</p> <p>Gatwick's cargo performance has been increasing in recent years reflecting the growth in the number of long haul markets and carriers. The project would facilitate an increase in air freight at Gatwick Airport by increasing the number of ATMs and thereby increasing both the frequency and range of destinations served.</p> <p>Many of these workers will not be employed directly by GAL, so the inferences drawn by CAGNE from its Annual Report are not generally applicable. In particular, for construction, it will be main contractors and sub-contractors who employ the workers and GAL is likely to award contracts to those who have a suitably skilled workforce in place in their supply chain. As is made clear in the ES Chapter 17: Socio-Economic [APP-042] and its appendices ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201] and ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Note [APP-199], the peak of 1,400 workers is relatively short.</p> <p>Tourism benefits are not disaggregated in the application, however, the Applicant has committed through the ES Appendix 17.8.1: Employment Skills and Business Strategy [APP-198] to work with partners to use expansion to boost tourism across the region.</p> <p>The Applicant has responded thematically to comments made within relevant representations regarding the range of employment opportunities and attracting employment during the construction phase at Section 4.25 of its Relevant Representations Report [REP1-048].</p>
Socio-Economics – Long-term employment	<p>In the longer term, employment at Gatwick is uncertain and unsustainable, due to inevitable changes to the low-cost airline market and automation and digitalisation.</p> <p>Aviation must decarbonise and to do this they will have to invest in new technology and greener fuels. This costs money, so we could see low-cost airlines disappearing as ticket prices will have to increase. Fewer flights must surely mean fewer jobs at the airport.</p> <p>Gatwick's business model is not sustainable as it relies on low-cost airlines leisure flights to Europe.</p>	<p>The estimate of new jobs on the airport is set out in Table A1.1.1 of the ES Appendix 4.3.1: Forecast Data Book [APP-075]. This takes account of productivity improvements and includes jobs at a range of skill levels.</p> <p>The Applicant's assessment of economic benefits, including jobs, is based on the Government's Jet Zero strategy. This includes forecasts for passenger demand which take account of the costs of things like the use of sustainable aviation fuels. These costs are therefore already included in the assessment.</p> <p>The Applicant has responded to comments made within relevant representations regarding employment due to automation and low-cost airlines disappearing at Section 3.24 of its Relevant Representations Report [REP1-048].</p>

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Socio-Economics – Freight	<p>CAGNE has prepared a short report on cargo forecasts for Gatwick as compared to other London airports. This identifies two key concerns: the lack of reliable onward surface access available to the airport and freight handler; and Gatwick's lack of suitable on-site infrastructure and logistics to handle increased freight levels. The report notes that Gatwick does not currently attract cargo flights, in contrast with both Heathrow and Stansted.</p>	<p>The Applicant acknowledges that Gatwick currently does not attract cargo flights. However, its cargo performance has been increasing in recent years reflecting the growth in the number of long haul markets and carriers. The project would facilitate an increase in air freight at Gatwick Airport by increasing the number of ATMs and thereby increasing both the frequency and range of destinations served.</p> <p>Freight traffic at Gatwick Airport is provided by bellyhold rather than dedicated freighter aircraft and as a result, an increase in the number of ATMs would have a direct impact on opportunities for freight traffic. This is discussed further in Section 8.3 of Needs Case Appendix 1 – National Economic Assessment [APP-251].</p> <p>In relation to surface access, the projected increase in cargo volume has been taken into account in the strategic and local transport modelling that forms part of the assessment presented in the Application.</p>
Water: Flood and Sewage	<p>CAGNE has serious concerns derived from members' local experiences with the potential flooding and sewage risks of the proposed new runway and taxiways, as detailed in the report it has produced.</p> <p>The Development would add to growing existing problems with flooding and sewage overflow into the waterways that surround and run through the Airport. Prolonged construction could increase pollution. There is no evidence that the new reed beds proposed would control flooding, as the Applicant has failed to assess their capacity to accommodate specific volumes of water and waste.</p> <p>In light of the flood history, CAGNE are particularly concerned by flooding of the River Mole, including when the Airport and sewage treatment plants discharge water in extreme events. Climate change will make such extreme events more frequent and severe. CAGNE has produced a short report on this matter.</p>	<p>Gatwick Airport is currently at risk of flooding from local watercourses such as the River Mole and Gatwick Stream as reported in Section 5 of ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. However, through provision of the mitigation measures listed in Table 11.8.1 of ES Chapter 11: Water Environment [APP-036] the NRP will not increase existing levels of fluvial (river) or surface water drainage flood risk for its lifetime including the predicted impact of climate change. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example, the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p> <p>Climate change will exacerbate both types of flooding relevant to Gatwick Airport (river/fluvial, surface water/pluvial), irrespective of the Project. The average number of days of heavy rain (the Met Office definition when precipitation is greater than 25 mm per day) is increasing for both the construction period for the 2030s (2020-2049) and the 2060s (2050-2079) (see Tables 15.5.5 and 15.5.6 in ES Chapter 15: Climate Change [APP-040]).</p> <p>The Project is not expected to increase future flood risk given the ES Appendix 11.9.6: Flood Risk Assessment [AS-078] which takes into account relevant climate change allowances as agreed with the Environment Agency, and the embedded mitigation as set out in Table 11.8.1 of ES Chapter 11: Water Environment [APP-036], Tables 15.8.4 and 15.9.1 of ES Chapter 15: Climate</p>

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		<p>Change [APP-040] and also summarised specifically for Climate Change in ES Appendix 5.2.3: Mitigation Route Map [REP2-011]:</p> <ul style="list-style-type: none"> • CC-1 Construction management measures – to avoid high flood risk zones, temporary flood protection/floodwater diversion • CC-2 Adverse weather measures in construction – including flood measures • CC-5 Realignment of the River Mole – improve flow and capacity of the river • CC-6 Flood compensation areas – two new areas • CC-7 Additional surface water attenuation – water storage in drainage network • CC-8 Additional water infrastructure – airfield syphons, noise bund syphons, new water treatment works, new pumping station. • CC-9 Highway drainage design – limiting discharges to watercourses. • C-14 Adverse weather plans in operation – during flood events. <p>The River Mole culvert extension, described in Paragraph 5.2.129 of the ES Chapter 5: Project Description [REP1-016], is included in the hydraulic model and was shown to not increase flood risk.</p> <p>The multiple potential risks from river and surface water flooding, collectively with the Project, are deemed not significant.</p> <p>The fluvial and surface water drainage mitigation strategies address the loss of floodplain and increased impermeable area that would result from the Project respectively. This would ensure that there would be no increase in flood risk to other parties for the during of the development, taking the predicted impacts of climate change into account. This is in accordance with the current Environmental Agency guidance (EA, 2022) which is based on the United Kingdom Climate Change Predictions 2018 (Met Office, 2018). Further detail on this is contained in:</p> <ul style="list-style-type: none"> • ES Appendix 11.9.6: Flood Risk Assessment [AS-078] • Surface Access Highways Surface Water Drainage Strategy Summary in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. <p>Regarding the rainfall data used in hydraulic modelling</p> <p>To remain consistent with the Upper Mole Flood Alleviation Model and 2019 Surface Water Model validation, the Applicant has continued to use FEH2009, and</p>

Topic	Matter Raised	Applicant's Response
		<p>consider this is appropriate for the modelling until such time as the Environment Agency Upper Mole model is revalidated or updated.</p> <p>The preliminary design of the drainage elements of the surface access highways works applied FSR rainfall data to undertake preliminary hydraulic calculations.</p> <p>This strategy was presented to LLFA drainage specialists on 7th September 2022 and 17th November 2022, and through subsequent technical engagement and design reviews. No objection was raised for using FSR rainfall data.</p> <p>FEH2022 data will inform the development of the detailed drainage design.</p> <p>The Environment Agency's guidance on the consideration of the impacts of climate change on peak river flows and rainfall intensity have been followed as part of the assessment of impacts reported in the ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. In addition, the impacts of a Credible Maximum Scenario have been assessed and reported in the FRA should current guidance underestimate the predicted impact of Climate Change.</p> <p>Regarding the requirement to follow the drainage hierarchy</p> <p>The surface water drainage design for the Project has followed the drainage hierarchy, following guidance from the LLFAs, Design Manual for Roads and Bridges (DMRB) guidance and industry good practice see ES Appendix 11.9.6: Annex 2 [APP-148].</p> <p>As stated in Section 6.4.5 of ES Appendix 11.9.6: Flood Risk Assessment [AS-078], the clay geology at Gatwick has been assumed to preclude the infiltration of runoff to ground. Additionally, the runoff from the airfield could potentially be contaminated with de-icer and could not be directly infiltrated to ground.</p> <p>Further ground investigation will be undertaken to inform the detailed design, but it is not anticipated that it would alter the current assumption that infiltration of runoff is not practicable.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity</p>

Topic	Matter Raised	Applicant's Response
		<p>to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary.</p>

Topic	Matter Raised	Applicant's Response
		<p>Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Reed Beds</p> <p>The proposed addition of reed beds is not intended for flood risk mitigation but instead the constructed wetlands would increase Gatwick's capacity to treat de-icer contaminated stormwater runoff from the existing pollution lagoons and increase their capacity to address the potential increase in use of de-icer as a result of the Project. As stated in ES Chapter 5: Project Description [REP1-016], these will be subject to regular inspections and maintenance.</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project. The Applicant has further explained its position in response to ExA question WE.1.9, Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, Gatwick does not envisage a scenario when it would develop a new local source of water.</p>

Topic	Matter Raised	Applicant's Response
		<p>Water Quality during Construction</p> <p>ES Appendix 5.3.2: Code of Construction Practice Annex 1 – Water Management Plan [APP-083] sets out the measures that will be used to mitigate potential adverse impacts on the water environment during construction of the Project.</p> <p>ES Appendix 11.9.7: Wastewater Assessment [APP-150] demonstrates that with the provision of new infrastructure as part of the Project, Gatwick's network can safely cope with the additional wastewater flows. The assessment considers the temporary increased demand during construction, demonstrating the wastewater network would have adequate capacity to accommodate the increase in flows and the impact would not be significant.</p> <p>Additionally, ES Appendix 11.9.8: Water Supply Assessment [APP-151] assesses the Project elements that will increase water consumption through increased passengers and temporary construction workforce combined with potential efficiencies to be implemented during construction. To date SESW has not identified any impediment to their meeting the increase in demand.</p>
Greenhouse Gases	<p>CAGNE supports and adopts in full the submissions by both AEF and NEF on the Development's unacceptable climate impacts. CAGNE maintains the detailed objections set out within its RR but does not repeat those here for concision.</p> <p>In short, it is clear that the Development – which would result in a larger increase in passengers and emissions than any airport expansion since the passing of the Net Zero legislation – would bring about a significant increase in greenhouse gas emissions. There is a high risk that the Airport's target CO2 reductions will not be achieved without binding annual emissions caps in line with the Government's own trajectory for decarbonisation. To be effective, any such caps should include sufficient monitoring requirements.</p>	<p>The Applicant has responded thematically to comments made within relevant representations on climate change and greenhouse gases at Sections 4.6 and 4.16, respectively, of the Relevant Representations Report [REP1-048]. The Applicant has also provided responses to both the AEF and NEF Written Representations within this report, including Appendix D which responds to the detailed matters raised by NEF.</p> <p>It is apparent that there is no in principle reason why an application for MBU cannot be of a scale to trigger the requirement for a DCO application – such an outcome is directly anticipated within the MBU policy itself and within the ANPS.</p> <p>It is then a matter of assessment whether the scale of greenhouse gas is such as to conflict with policy. That detailed assessment is set out in ES Chapter 16: Greenhouse Gases [APP-041]. The assessment concludes that the GHG emissions from the application would not have a material impact on the ability of government to meet its climate reduction targets.</p> <p>The question of whether or not caps should be placed on the growth of aviation at Gatwick is a matter to which the Applicant has responded elsewhere – for example, in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

25 Conservators of Ashdown Forest

25.1.1. Table 25.1 sets out the Applicant’s response to the matters raised in the Written Representation from Conservators of Ashdown Forest [\[REP1-152\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [\[REP1-048\]](#).

Table 25.1 Response to Written Representation from Conservators of Ashdown Forest

Topic	Matter Raised	Applicant’s Response
Climate Change: Impacts on ecology	Ashdown Forest consists of some incredibly rare and important habitats. One of these is the wet heath and valley mires that support species that can only be found in a handful of other sites in the South East. These include species like Marsh Gentian (<i>Gentiana pneumonanthe</i>), Sundews (<i>Drosera</i> sp.) and Marsh Fern (<i>Thelypteris palustris</i>). We are already witnessing that a changing climate is impacting habitats and species, as areas that have historically stayed wet throughout the year are becoming drier and staying drier for longer. This in turn allows grass species to dominate, changing the vegetation structure making it less diverse, and impacting on wet heath assemblages. This is only one example of how climate change is negatively impacting vulnerable habitats and why proposals to increase air pollution from air traffic will significantly impact rare and vulnerable species. Off-setting carbon will not help these habitats, only a reduction in carbon/greenhouse gases use will have a sustainable long-term impact.	<p>The potential for climate change to alter the assessment of impacts on ecology receptors has been considered in Section 9.10 of 5.1 ES Chapter 9: Ecology and Nature Conservation [APP-034]. The conclusion of this was that, because the majority of the impacts on ecology receptors due to the Project would happen early in the Project timeline when the effects of climate change may be considered to be less severe, climate change would not significantly change the effects on most receptors.</p> <p>The Applicant has responded thematically to impacts to Ashdown Forest at Section 4.13 of its Relevant Representations Report [REP1-048].</p> <p>ES Appendix 15.9.1: In-combination Climate Change Impacts Assessment [APP-188] for the Project, considers the extent to which climate change exacerbates a potential effect of the Project on an environmental receptor, and looked at the combined impacts from:</p> <ul style="list-style-type: none"> • Hotter and wetter conditions, in-combination with ecology and nature conservation and impacts associated with this on invasive species, pests and diseases to ancient woodland and other habitats. • Drought/drier conditions, in-combination with ecology and nature conservation and impacts associated with this on reductions in river flows and water levels, freshwater flora and fauna, wetter areas/wet grassland habitats. <p>The in-combination climate change impacts assessment concluded that the consequences of the ICCIs are considered minimal, and therefore no significant impacts were identified during the construction or operational periods given the mitigation identified.</p> <p>Ashdown Forest is outside of scope of the Climate Change Resilience Assessment ES Appendix 15.8.1: Climate Change Resilience Assessment [APP-187] which looks at the risks from a changing climate on the Project itself and the receptors within the Project boundary.</p>

Topic	Matter Raised	Applicant's Response
Habitats Regulation Assessment	<p>The HRA report confirms that there will be an increase in traffic through Ashdown Forest yet the methodology to measure the impact on the SAC was limited to a walkover survey on one stretch of the A22. This is not sufficient to determine the effect this will have on the whole SAC. The surveyed area only included the initial 10m from the roadside, which as is correctly stated, is not the correct vegetation assemblage for Lowland Heathland as stated in the SAC designation. The unfavoured vegetation within this 10m strip highlights the significant impact of nutrient enrichment from road traffic on soil and vegetation communities. Increased traffic will impact on the SAC, not just on the A22 but across the Forest and as more nutrients (and pollutants) wash further into the Forest, larger areas of the SAC will be affected.</p>	<p>The Applicant has responded thematically to impacts to Ashdown Forest at Section 4.13 of its Relevant Representations Report [REP1-048].</p>
Habitats Regulation Assessment: Nitrogen Deposition	<p>The figures taken from Natural England already show that the mean average of air traffic over Ashdown Forest is on the higher end of their scale. With the proposed expansion, this is only ever going to increase, which will inevitably increase the amount of nitrogen deposition across the site. Nitrogen deposition affects vegetation communities by enriching the soils. This improves the conditions for more vigorous and undesirable plant species to outcompete the protected dwarf shrub species of the Forest. We use a mixture of grazing and mechanical methods to conserve the SAC vegetation communities, however with further soil enrichment from nitrogen deposition, management of the invasive species (Purple Moor grass, birch and pine scrub and bracken) become increasingly difficult.</p>	<p>The Applicant has responded thematically to impacts to Ashdown Forest at Section 4.13 of its Relevant Representations Report [REP1-048].</p>
Tranquility	<p>Ashdown Forest is governed by the Ashdown Forest Act of 1974 which in part states: "To regulate and manage the Forest as an amenity and place of resort subject to existing rights of common and to protect those rights, to protect the forest from encroachments and to conserve it as a quiet and natural area of outstanding natural beauty". As previously stated, the proposed extension at Gatwick will result in increased road traffic and air traffic which will increase the noise and air quality problems, not just on Ashdown Forest but throughout the High Weald AONB. This impact on air quality and noise will impact on people's ability to enjoy the Forest as a quiet place of natural beauty.</p>	<p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] Section 8.9 includes a thorough assessment of effects on the perception of tranquillity within the High Weald National Landscape and other nationally designated landscapes as a result of an increase in the number of overflying aircraft up to 7,000 ft above local ground level compared to the future baseline situation in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Ashdown Forest). The maximum increase in daily overflights of 15 to 20% is defined in Table 2.2.7 as 'increase in number of daily overflights discernible to people'. It is considered that the increase in overflights may be imperceptible to some receptors. The magnitude of change is generally considered to be negligible and the level of effect up to Minor adverse. Whilst an adverse effect on the perception of tranquillity within nationally designated landscape, including Ashdown Forest, is identified as a result of the Project, it is not considered to constitute significant harm to this perceptual quality or people's ability to enjoy these landscapes.</p>

Topic	Matter Raised	Applicant's Response
Habitats Regulation Assessment	To conclude, based on the evidence provided the Ashdown Forest does not support the proposal of the Gatwick Airport Northern Runway project as it will have a significant impact on the protected SPA, SAC, SSSI of Ashdown Forest and the wider AONB landscape. The methodology to survey Ashdown Forest in the HRA report was not a robust process to truly assess the significant impact, and a further proposed survey in 2038 is not sufficient mitigation against these impacts. We would like to see further vigorous surveys undertaken on the increased road and air traffic, and how this can be mitigated against to protect the heathland habitats and maintain Ashdown Forest as a place of quiet resort, much loved and enjoyed by approximately 1.4m visitors a year.	The Applicant has responded thematically to impacts to Ashdown Forest at Section 4.13 of its Relevant Representations Report [REP1-048] .

26 CPRE Sussex

26.1.1. Table 26.1 sets out the Applicant's response to the matters raised in the Written Representation from CPRE Sussex [\[REP1-153\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 26.1 Response to Written Representation from CPRE Sussex

Topic	Matter Raised	Applicant's Response
Climate Change	<p>We accept that the various policy documents identified by the applicant are indeed relevant to the case although we note the limited policy relevance of Jet Zero – we feel the Jet Zero strategy has more policy weight.</p> <p>We will identify material with which we agree when it comes to any spoken and written submission around the Issue Specific Hearing on Climate Change which is where we will deal with matters related to current and future policy considerations linked to this issue. These will include both Jet Zero and the Jet Zero Strategy as well as the importance attached to meeting the Secretary of State's international obligations etc. They will also deal with matters relating to emissions and impacts of climate change mostly in terms covered by the wide range of matters addressed in the evidence base used by the Climate Change Committee and its Adaptation Committee in the independent views they provide to the UK Government(s).</p>	The Applicant's position on these matters is set out in the Planning Statement [APP-245] ; particularly at Section 8.7.
UK Aviation Policy	The applicant's proposal cuts across established policy (set out in the "important and relevant" Airports NPS) for any new runway in the south-east of	The Applicant has responded to similar issues raised by the Joint Local Authorities in The Applicant's Response to the Local Impact Report (Doc Ref. 10.15). In

Topic	Matter Raised	Applicant's Response
	<p>England to be based at Heathrow. CPRE Sussex view this application as at best premature and at worst highly damaging.</p> <p>The Airports NPS is very clear: any new runway in the south-east should be at Heathrow. Indeed, it explicitly rejects the proposal for a second runway at Gatwick examined by the Airports Commission. In relation to that proposal, the Airports NPS concludes that “expansion at Gatwick Airport would not enhance, and would consequently threaten, the UK’s global aviation hub status” (para 3.19). In addition, “Expansion at Heathrow Airport is expected to result in larger benefits to the wider economy than expansion at Gatwick Airport” (para 3.27), “The number of local jobs created at an expanded Heathrow Airport is predicted to be much greater than at Gatwick Airport...and the jobs would also be created more quickly” (para 3.28), and “Heathrow Airport has advantages over Gatwick Airport with its greater integration into the national transport network, benefitting both passengers and freight operators” (para 3.37). This current proposal for a new Gatwick runway also fails to supply the new runway length and ATM capacity required by the Airports NPS for a new runway in the south-east, that would be supplied by a 3rd Heathrow runway (para 1.15). The proposal goes well beyond ‘making best use of existing runways’: it is, in practice, a new second runway together with extensive new needed construction to support it both within and without the airport. It is important to be clear on the scale of what is being proposed. Gatwick will move from being a single runway airport to one operating two runways simultaneously. The reasonable conclusion to draw is thus that the proposed works in practice create a new second runway.</p> <p>The proposal moves the midline of the existing emergency/relief runway 12m north to comply with minimum runway separations. The applicant stated at Special Issue Hearing 1 that aircraft leaving the two runways would use the same flight paths when departing the airport requiring close air traffic management. The 12m proposed move is not a simple lateral extension of the existing runway (of the kind that has been permitted at Southampton in terms of runway length via local authority decision-making) but one that requires construction of a new runway base about 20m wide along the whole length of the existing runway (even if the northern section of the existing runway can be re-used as the southern part of the new runway), associated and quite extensive reworking of taxiways (for instance, new taxiway surfaces for Taxiway Juliet), then resurfacing and, presumably, removal of runway material</p>	<p>addition, the Applicant’s position is set out in response to Written Representations from CAGNE (Appendix B) and Heathrow Airport Limited (Appendix C).</p>

Topic	Matter Raised	Applicant's Response
	<p>to the south in order to avoid any confusion as to what constitutes any Northern Runway for pilots taking off from an un-instrumented runway.</p> <p>In addition, there is substantial upgrading required to other taxiways and aircraft stands, often to accommodate larger aircraft, together with reworkings of terminals and new-build hotel and carparking – plus a range of associated other work (say, on flood management). Despite all this we believe the reworking of the airport and associated infrastructure is incomplete and that more work will be required in due course. For example, in reality there should also be substantial works linked to further upgrade the recently upgraded railway station which has not been designed to deal with increased passenger numbers included within the proposal over the ones currently anticipated in the next few years. Without this rail passengers will be overcrowded and likely unable to meet the 30min travel period to London the applicant claims to be standard (this is in fact the fastest times available not an average time). This extent and duration of construction is not making best use of existing facilities. However much the applicant would like to present it as being otherwise, this is in practice an application for a new runway in the south-east of England, contrary to the policy set out in the Airports NPS.</p> <p>Given the scale and nature of the works above, looking at policy on “making best use of existing runways” is a distraction and a red herring. It is designed for smaller proposals – and airports other than Gatwick.</p> <p>Even if one (incorrectly in our view) disregards the NPS focus of ‘making best use of existing runways’ as being at airports other than Gatwick, the relevant policy position is set out in Beyond the Horizon: Making best use of existing runways (2018). This makes clear that “making best use” is expected to apply, in the main, to relatively small applications, with planning determinations largely to be made by Local Planning Authorities (as set out in bold in para 1.29 to stress its importance).</p> <p>Gatwick’s proposal exceeds this value and is thus out of scope to be considered best use as defined by “Beyond the Horizon: Making best use.”</p> <p>Indeed, as stated in the Planning Statement (Book 7, p41 Table 3.3 and associated paragraphs) capacity in terms of Base Case passenger numbers could still increase even without the current proposal from the 2019 figure of c. 46million to c.72million in 2040 if there really was demand at such passenger</p>	

Topic	Matter Raised	Applicant's Response
	<p>or ATM levels. We note that no detailed explanation is given as to how the base case level of growth would be achieved.</p> <p>So, a new runway is not required for Gatwick to “make best use” of its existing facilities. A similar conclusion can be reached by using passenger numbers. For example, the additional benefit to Gatwick of the new runway project would be 13m extra passengers per year. This is well above a 2% increase over the base case they provide.</p> <p>Furthermore, constructing a new second runway and the extensive reworking of the airport is beyond what would be expected under making best use and also deprives the Las of their ability to influence development in the area as much of the proposal would normally be dealt with by the local planning process.</p> <p>The proposal is well beyond the scope of “making best use” in terms of the nature and scale of the works, and the number of ATMs it expects to generate. It is in practice a new second runway at Gatwick and thus contrary to the “important and relevant” Airports NPS. The main conclusions of the NPS must still stand and they should withdraw the application or it should be refused.</p>	

27 Crawley Borough Council

- 27.1.1. Table 27.1 sets out the Applicant's response to the matters raised in the **Written Representation from Crawley Borough Council** [REP1-067]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048], the response to the Joint West Sussex Authorities in **The Applicant's Response to Local Impact Reports** (Doc Ref. 10.15) and the **Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council** [REP1-032].
- 27.1.2. The Applicant also considers that both the Local Impact reports of the West Sussex Authorities and the written representations of the authorities, including Crawley, are notable for the fact that they do not acknowledge or apply the terms of national policies for aviation, which are at least important and relevant and which should provide a balanced framework for the consideration of the application. Accordingly, **Appendix A** of this Response sets out those policy matters which the Applicant considers should have been acknowledged in the Written Representations and to which significant weight should be attached in any attempt to strike the planning balance in this case.

Table 27.1 Response to Written Representation from Crawley Borough Council

Topic	Matter Raised	Applicant's Response
Consultation	CBC and other Local Authorities had raised concerns regarding the meaningfulness of the Applicant's handling of pre-application consultation and engagement, including the lack of detailed information supporting the consultations previously carried out. This was set out by the Authorities in their	Full details of the pre-application consultation carried out by the Applicant is set out in the Consultation Report [APP-218] and Appendices [APP-219 to APP-244]. The application was subsequently accepted for Examination as shown in the Notification of Decision to Accept Application [PD-001] on the basis that the

Topic	Matter Raised	Applicant's Response
	<p>Joint Adequacy of Consultation report. These shortcomings appear to have continued with regard to the recent consultation on the proposed changes to the DCO and concerns about this are also reflected in CBC's response to the Applicant's recent consultation.</p>	<p>Applicant had complied with the pre-application procedure requirements under Part 5, Chapter 2 of the Planning Act 2008 and having regard to Adequacy of Consultation representations received.</p> <p>In respect of the Change Request 1 Consultation, the Applicant carried out consultation in line with the proposed consultation approach set in the Notification of Proposed Project Changes Report [AS-113], which the ExA confirmed "provides an appropriate basis for non-statutory consultation" in Examining Authority's Response to Applicant's Change Notification [PD-008]. The Applicant also followed the advice given within the ExA's Procedural Decision, such as extending the consultation period to provide additional time over the Christmas / New Year holiday period. In respect of engagement with CBC and as explained in the Consultation Report Addendum [AS-142], the Applicant held a briefing session with the ten Local Authorities (including CBC) before the start of consultation and has responded to all consultation feedback received, including from CBC, within the Consultation Report Addendum (Table 5). The changes have subsequently been accepted by the ExA into the Examination and can be viewed in the Rule 8 Letter [PD-011].</p>
General	<p>Fundamental concerns regarding the extent and robustness of the assessment work undertaken within the DCO submission across a range of topics, including defective baseline assessments and a lack of published information. CBC therefore believes there are fundamental flaws in the conclusions that the Applicant has brought forward to justify its DCO application. These include:</p> <ul style="list-style-type: none"> • The Applicant's inability to present an appropriate need/capacity case for progressing the Northern Runway Proposals including issues with the aircraft sequencing, the bottom-up demand approach adopted giving rise to over optimistic forecasts of capacity and therefore of the derived economic benefits arising from such growth, with resulting significant consequential impacts on mitigation triggers. • The lack of evidence of specific measures to demonstrate that the various targets set by the Applicant can be met or that mitigations can be achieved e.g surface access targets or other environmental parameters associated with noise and air quality. 	<p>The Applicant has responded to Crawley Borough Council's detailed comments in the various topic sections of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
General	<p>CBC considers that the Applicant is offering wholly insufficient funding to support action plans (or outline action plans) intended to deliver the targets used to substantiate the proposals such as the surface access targets, the</p>	<p>The Applicant has responded to Crawley Borough Council's detailed comments regarding targets in the various topic sections of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	employment, skills and business aspirations for the local economy, air quality action plans or an effective noise envelope.	
General	The West Sussex LIR identifies wide ranging negative impacts across all topic areas. CBC is also of the view that the scope and scale of mitigations or compensation proposed are wholly insufficient to overcome the expected adverse impacts arising from the proposals. Whilst it is acknowledged that there are some economic benefits arising from the scheme, even these give rise to concerns particularly regarding how they can be secured for the local community which the CBC believes that the Applicant has fallen well short of addressing. This in turn undermines the ability for CBC to weigh such benefits positively against the wide ranging negative environmental and social impacts arising such as those topics cited previously.	The Applicant has responded to Crawley Borough Council's detailed comments regarding mitigation in the various topic sections of The Applicant's Response to the Local Impact Reports (Doc Ref. 10. 15).
General	<p>The control mechanisms set out in the draft Development Consent Order (dDCO) and its supporting control documents are not sufficiently detailed, effective, or enforceable, with much being left to subsequent approvals or discharge of requirements. There has to date been limited discussion or engagement with the Applicant about the resources, timings and costs involved with addressing these matters.</p> <p>Of particular concern, is the lack of sanction against the Applicant should the continued growth of the airport envisaged by GAL give rise to consequences which exceed expected environmental parameters without any clear accountability to the Local Authorities or the local community. CBC believes there should be effective and robust thresholds to prevent further growth of air traffic movements should the airport growth give rise to any anticipated or actual exceedance of such thresholds. This would be most effective in controlling air and ground noise, air quality, surface access modal shift and greenhouse gas emissions.</p>	The Applicant has responded to the Joint West Sussex Authorities' detailed comments on the Draft DCO at Appendix C to The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
General	There appears to be a lack of clarity on the approach to be taken as regards the identification, management, enforcement and where necessary, the funding of local impact mitigation given the longevity of the operation of the proposals and the potential for circumstances and potential impacts to change over time.	The Applicant has responded to Crawley Borough Council's detailed comments regarding mitigation and targets referred to in the various topic sections of The Applicant's Response to the Local Impact Reports (Doc Ref. 10. 15).
Agricultural Land Use and Recreation	Additionally, the DCO proposals do not recognise the opportunities for improving sustainable links and connectivity beyond the confines of the airport and its immediate environs including active travel, recreation, ecological and landscape connections.	The Applicant has responded to Crawley Borough Council's detailed comments on active travel at Section 4.8 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15)

Topic	Matter Raised	Applicant's Response
Ecology and Nature Conservation	Similarly, the significant felling of trees arising from the proposals has not been fully assessed nor is there acknowledgement of the need for adequate compensation through replanting and/or compensation through contributions to off-site replacement as expected through adopted Local Plan policy and reinforced by the government's new Environment Act legislation, which passed into law in November 2021.	The Applicant has responded to Crawley Borough Council's detailed comments regarding arboriculture at Section 4.6 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
Section 106 Agreement	CBC is also concerned that there would be significant future resource implications for the discharge of all the Requirements within the deadlines expected by the applicant, increased further by the required monitoring responsibilities associated with the DCO. The Council would expect full remuneration to resource these additional demands, as well as associated agreements to ensure appropriate and fully funded pre-requirement discharge discussions take place.	Paragraph 3 of Schedule 11 of the draft DCO (Doc Ref 2.1) requires the undertaker to pay a fee to the relevant discharging authority where it makes an application to a discharging authority in respect of a DCO Requirement in Schedule 2 of the draft DCO. Schedule 11 also sets out the prescribed level of these fees. Where an application is made to CBC for its agreement or approval pursuant to a DCO Requirement, CBC will receive the relevant fee.

28 David Gill

28.1.1. Table 28.1 sets out the Applicant's response to the matters raised in the Written Representation from David Gill [\[REP1-155\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 28.1 Response to Written Representation from David Gill

Topic	Matter Raised	Applicant's Response
Socio-Economics	<p>The continuous expansion at Gatwick allowed me to offer long term employment and security for many people with the opportunity for them to develop both personally and in skill set. As a construction company the local supply chain is of paramount importance and if this scheme is allowed to proceed this will enhance the local economy and employment opportunities.</p> <p>As a local resident living in Horsham for the last 17 years and with a strong sense of community, I have also experienced the benefits to our town parallel to steady growth at Gatwick over the years.</p> <p>I am not supporting this proposal for personal work/employment benefits as I will hopefully be retired by the time construction works are well underway. I genuinely believe this is a win -win for everyone in terms of all local towns and every business connected with the supply chain for Gatwick airport as a whole.</p>	Noted. The Applicant welcomes the comments in support for the Project.

Topic	Matter Raised	Applicant's Response
	With excellent facilities and transport links the expansion in my opinion, can only enhance the town and surrounding areas which has recently accommodated a new school with 1600 pupils at Bohunt as well as the ongoing project of building an additional 7000-8000 new homes moreover, in the past 5 years so much of the infrastructure is primarily in place.	

29 David Wilson

29.1.1. The Written Representation from David Wilson [\[REP1-156\]](#) has been entirely redacted by the Planning Inspectorate and therefore the Applicant is unable to provide a response.

30 Dorothy Thorp

30.1.1. Table 30.1 sets out the Applicant's response to the matters raised in the Written Representation from Dorothy Thorp [\[REP1-157\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 30.1 Response to Written Representation from Dorothy Thorp

Topic	Matter Raised	Applicant's Response
Air Quality and Noise	This is to much we are overloaded with planes ;in the last few years they have turned over our house out of the older flightpath Since 1970 been here used to occasionally use binoculars to see a plane Less pollution and noise is needed no more.	The Applicant has provided a response to thematic concerns regarding increased air quality and noise at Sections 4.3 and 4.22 in its Relevant Representations Report [REP1-048] .

31 Dr David Tayler

31.1.1. Table 31.1 sets out the Applicant's response to the matters raised in the Written Representation from Dr David Taylor [\[REP1-158\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 31.1 Response to Written Representation from Dr David Taylor

Topic	Matter Raised	Applicant's Response
Noise and Vibration	I am concerned about noise from Gatwick flights and do not think that the applicant has considered this sufficiently. The applicant only seems to consider noise close to the airport, but it is suffered a long way away over very many communities.	The Applicant has provided a response to thematic concerns regarding increased noise at 4.22 in its Relevant Representations Report [REP1-048] . The assessment of noise impacts follows the appropriate guidance including CAA CAP1616. Noise is modelled and assessed using a series of noise metrics including Leq 16 hr, Leq 8 hr, N60 and N65, across the range of levels specified in that guidance. At great distances the effect of the increased numbers of flights from the project is illustrated through overflight mapping which has been completed up

Topic	Matter Raised	Applicant's Response
		to 35 miles from Gatwick accounting for the numbers of flights at heights of up to 7000 feet above local ground level in accordance with that guidance.
Landscape: Impacts on Ashdown Forest	I am concerned about the Ashdown Forest, which is an important area for the health and well being of local people and visitors as it provides a space for outdoor recreation. It is also an important area for conservation and environmental protection. Gatwick should reduce the already unacceptable noise over it rather than increase it. It is important for the local economy as it supports businesses that are selling tranquillity and need tourism to survive. These rural business may be anything that needs peaceful outdoor space to thrive. These rural businesses are pubs, restaurants, hotels, heritage attractions, open gardens, B&Bs, campsites, riding schools, wedding venues. The list goes on and on and there has not, as far as I can see, been any thought at all about the impact the more noise and traffic from Gatwick.	The Applicant has provided a response to thematic concerns the impact of enjoyment of nationally designated landscapes resulting from overflights at Section 4.19 of its Relevant Representations Report [REP1-048]. ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor adverse effects on the perception of tranquillity which is not significant. The special qualities that people living within and visiting nationally designated landscapes experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived.
Noise and Vibration	This concern is in addition to the effect of noise over peoples' houses and schools. Please could the Planning Inspectorate think about all the people who would be adversely affected by a Gatwick almost as big as Heathrow is today. People would not generally choose to spend precious holiday time next to Heathrow, so that is what Gatwick expansion will do to the Surrey, Sussex and Kent areas that suffer from Gatwick overflight. The noise would drive people seeking leisure time out of the area and businesses would suffer.	The Applicant has provided a response to thematic concerns regarding increased noise at 4.22 in its Relevant Representations Report [REP1-048].

32 Dr Frederic Jean Sage

32.1.1. Table 32.1 sets out the Applicant's response to the matters raised in the Written Representation from Dr Frederic Jean Sage [REP1-159]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 32.1 Response to Written Representation from Dr Frederic Jean Sage

Topic	Matter Raised	Applicant's Response
Surface Transport	There are no clear plans to mitigate impacts on local area whether in terms of noise pollution or ground pollution from increase traffic.	The Applicant has responded to concerns that air quality will worsen as a result of the Project, increasing pollution from airport and road traffic sources in Section 4.3 in its Relevant Representations Report [REP1-048], including the measures proposed in response. Similarly, Section 4.22 of the Relevant Representations Report [REP1-048], addresses noise concerns.

33 East Sussex County Council

33.1.1. The Applicant’s response to the matters raised in the Written Representation from East Sussex County Council [\[REP1-071\]](#) are contained at Section 2 of the **Applicant’s Response to Local Impact Reports** (Doc Ref. 10.15) and therefore has not reproduced those responses in this report.

34 Environment Agency

34.1.1. Table 34.1 sets out the Applicant’s response to the matters raised in the Written Representation from the Environment Agency [\[REP1-072\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [\[REP1-048\]](#) and **Statement of Common Ground between Gatwick Airport Limited and the Environment Agency** [\[REP1-034\]](#).

Table 34.1 Response to Written Representation from the Environment Agency

Topic	Matter Raised	Applicant’s Response
Water Environment: Project description (ES Chapter 5)	<p>Page 5-40 Paragraph 5.2.165 Museum Field; and Page 5-41 Paragraph 5.2.173 Car Park X Flood Compensation Areas:</p> <p>These Paragraphs seem reasonable. We have noted that the proposed capacities of both the FCAs are different in the updated Project Description to those in the November 2023 Flood Risk Assessment. We would question what capacities of FCA’s were modelled as part of the with scheme modelling.</p>	<p>The ES Chapter 5: Project Description [REP1-016] states potential storage capacities and design footprints, while the ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078] states the actual volume of flood water stored in each modelled event. Therefore, the FCA capabilities modelled followed those listed in Paragraphs 7.2.7 and 7.2.8 in the ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078]. Details of the hydraulic modelling are presented in of ES Appendix 11.9.6: Flood Risk Assessment – Annex 5 [APP-149].</p>
Water Environment: Fish Passage and Floodplains	<p>Page 5-42 Paragraph 5.2.178 We welcome the description of Weir and Fish Pass to the River Mole and that reference is now made on ES Figure 5.2.1e (which is an updated map). The wording on Figure 5.2.1e states ‘weir on the River Mole Runway Culvert’ and doesn’t specifically mention the additional fish pass to the weir slightly upstream. This should be included in the description.</p> <p>Note: We cannot find any reference in the updated Project Description regarding proposed syphons on Taxiway East, Taxiway West, through the Noise Bund and as part of the active travel scheme at Longbridge roundabout. This is a point of concern as these syphons/culvert were proposed to maintain floodplain connectivity and flow paths.</p> <p>The applicant referenced in the November 2023 Flood Risk Assessment paragraphs 7.2.9, 7.2.10 and 7.2.11) and are shown in ES Appendix 11.9.6 (the FRA) Figure 7.2.1.</p>	<p>The provision of syphons has been included in the Design and Access Statement Appendix 1: Design Principles [REP2-037]. Requirements 4 and 5 of the Draft Development Consent Order (Doc Ref. 2.1) require detailed design to be in accordance with these Design Principles.</p> <p>ES Figure 5.2.1e will be updated to include a label to the location of the proposed fish pass upstream (south) of the River Mole Runway Culvert. Construction of the weir and fish pass is secured in the Draft Development Consent Order (Doc Ref. 2.1) Works No. 42.</p> <p>The taxiway and noise bund syphons are secured via the design principles DBF13 DDP2, DDP13, DDP18 in Appendix 1 of the Design and Access Statement Appendix 1: Design Principles [REP2-037].</p>
Water Environment	<p>Page 5-67 Paragraph 5.3.131: The following text should be amended as follows:</p>	<p>The quality of runoff from the surface access improvement works has been assessed following National Highways HEWRAT process as reported in ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144]. The</p>

Topic	Matter Raised	Applicant's Response
	<p>The drainage would be designed to attenuate runoff rates in rainfall events up to the 1% (1 in 100) annual exceedance probability event to rates no higher than existing and to ensure any discharge to local watercourses or the existing drainage network is similarly attenuated. Suitable treatment <u>must</u> also be provided to manage the water quality of discharges to watercourses.</p>	<p>assessment concludes that the Project would have no detrimental impact upon the water quality of receiving watercourses.</p>
Water Environment	<p>Page 5:41: Paragraph 5.2.176: This describes the Car park Y flood storage tank but there is no reference to it in the Environmental Statement Chapter 11: Water Environment or the Development Consent Order document.</p> <p>Informative: Fine sediment will deposit in a flood storage tank fed by a river. Removal of this from a tank may be very difficult. Careful thought should be given to the design in terms of desilting.</p>	<p>The new drainage attenuation tank beneath Car Park Y is referred to in ES Chapter 11 Water Environment [APP-036] Paragraph 11.7.24 and Table 11.8.1 and ES Water Environment Figures [APP-057] Figure 11.8.1.</p> <p>Work No. 30 within Schedule 1 of the Draft Development Consent Order (Doc Ref. 2.1) describes Car Park Y as including “Earthworks and works to construct an attenuation storage facility with a capacity of up to 32,000 m³.”</p>
Water Environment	<p>Page 5-42 Paragraph 5.2.178:</p> <p>The effect of the weir on the eastern culvert is not only about enabling fish passage but also to prevent the culvert(s) from silting up and therefore reduce Gatwick Airport’s expenditure and decrease the chance of environmental incidents during desilting works.</p>	<p>Noted.</p>
Water Environment	<p>Page 11-107 Paragraph 11.9.17:</p> <p>Requirement: If flow into the Car Park X and Y flood compensation area is to be taken directly off the Crawters Brook, this will highly likely cause a shoal of sediment in the Crawters Brook directly opposite the offtake. This is because the Crawters Brooks is morphologically damaged and highly prone to siltation. A bathymetric survey should be conducted each time the flood storage area is used and necessary dredging conducted to ensure that the channel bathymetry and therefore flood risk remains the same.</p> <p>Informative: To avoid the need for the above requirement, it is recommended that this flood compensation area is fed either from the River Mole (which is less damaged morphologically) or from surface water.</p>	<p>Neither Car Park X or Car Park Y are filled via Crawter’s Brook. As stated in Paragraph 7.2.8 of ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078], Car Park X receives flow from the River Mole and this is demonstrated in Figure 5.2.1 of ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078]. Paragraph 7.3.3 of ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078] indicates Car Park Y is a surface water drainage mitigation measure incorporated into the airfield surface water drainage network. Therefore, Car Park Y has no association with any fluvial flooding nor watercourses.</p>
Water Environment: Project Change 3: Water Treatment Works	<p>Concerned about Project Change 3 which proposes the construction of 6 reedbeds to the south of Crawley Sewerage Treatment works.</p> <p>There is not enough information on the new proposal and what is being proposed. We would like to see information on the following:</p> <ul style="list-style-type: none"> • Details of the potential drainage impacts to the watercourse and nearby floodplain. 	<p>The proposed constructed wetland treatment system (reed bed) is intended as mitigation for the potential increase in de-icer use as a result of the Project. It will receive flow from the existing long-term storage lagoons and treat is prior to discharge to the Gatwick Stream, currently such flows are treated via Thames Water’s Crawley STW. The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> Information on the impact the change will make to fish and biodiversity. Clarity on pollution prevention methods proposed. <p>The proposed reed bed treatment process for de icer would require a permit. As this is not clean rain or groundwater, a water discharge permit would be required to cover the activity as there is a treatment taking place to remove pollutants.</p> <p>The discharge would have to satisfy the criteria which is decided separately by our National Permitting Team.</p>	<p>treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge to Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licences [APP-264].</p> <p>The design of the new facility would include testing of the effluent and the means to return it to the storage lagoons for re-treatment if of insufficient quality for discharge.</p>
Water Environment	<p>Paragraph 22 Discharge of Water:</p> <p>(6) This section states 'The undertaker must not, in carrying out or maintaining works under this article, damage or interfere with the bed or banks of any watercourse forming part of a main river, save where such damage or interference is required for the purpose of carrying out works authorised under this Order'. This could potentially avoid possible damage to main river if the works fall under the DCO.</p> <p>(10), Not applicable.</p> <p>Paragraph 24 Authority to survey and investigate the land</p> <p>This paragraph describes trial pits and boreholes. It may be necessary to gain a FRAP or an Exemption for trial pits and boreholes on the floodplain or in proximity to main river. This isn't currently mentioned.</p>	<p>The Applicant does not understand the EA's comment on article 22(6), that it could "potentially avoid possible damage to main river if the works fall under the DCO", and the EA is invited to clarify any proposed amendments to the drafting. In this regard, the Applicant reiterates that the form of wording in this paragraph is precedented in article 25(5) of the Sizewell C (Nuclear Generating Station) Order 2022.</p> <p>The Applicant notes the EA's comment on article 22(10) and that this is detailed and responded to below.</p> <p>The Applicant notes the EA's comment on article 24. The Applicant has already submitted its List of Other Consents and Licences [APP-264] which acknowledges that Flood Risk Activity Permits will be required for works within the floodplain or near to main rivers or flood defences. It is not considered necessary to refer to this statutory requirement on the face of the DCO, in the same way that other additional consents that may be required for the Project are not referenced.</p>
Draft Development Consent Order	<p>Description of Works.</p> <p>We cannot find any reference amongst the numbered list of Works to the proposed syphons. For example, Works No.18 references the removal and replacement of the western noise mitigation bund, but there is no reference in the description regarding the provision of syphons.</p>	<p>The provision of syphons has been included in the Design Principles (Appendix 1 to the Design and Access Statement Volume 5 [APP-257]). Requirements 4 and 5 of the Draft Development Consent Order (Doc Ref. 2.1), require detailed design to be in accordance with these Design Principles.</p>

Topic	Matter Raised	Applicant's Response
Draft Development Consent Order	<p>Work No.31 Car Park X, the description seems reasonable but there is no reference to the approximate storage capacity (given as 55,000m³ in the updated project description). There is an approximate capacity associated with Car Park Y which is for surface water storage. We request this approximate storage volume for Car Park X is written into the Draft DCO.</p> <p>Proposed works to bridges over the River Mole are referenced in Works No. 36, No.37 and No. 40.</p>	<p>We have added “approximately 55,000m³” into the Works No descriptions and the final scale of the storage capacity will be subject to the EA’s approval through a FRAP which will be applied for following detailed design and will justify the final proposed storage capacity on the basis of the evidence at the time.</p>
Draft Development Consent Order	<p>Work No.38 Museum Field Flood Compensation Areas. The description appears reasonable, but like Car Park X, an approximate capacity of 57,600m³ is described in the updated Project Description. We request this approximate storage volume is written into the Draft DCO.</p>	<p>We have added “approximately 57,600m³” into the Works No descriptions and the final scale of the storage capacity will be subject to the EA’s approval through a FRAP which will be applied for following detailed design and will justify the final proposed storage capacity on the basis of the evidence at the time.</p>
Draft Development Consent Order	<p>Page 63 Paragraph 23 Flood Compensation Areas. In (1), various Work Numbers are listed indicating that none of those should commence until the Flood Compensation Areas (FCAs) are in place. For Works 36 and 37, there are some works highlighted to the Longbridge Roundabout and the North Terminal access works but we request confirmation that the FCA’s do not need to be put in place prior to the works taking place to the existing road bridge over the River Mole, otherwise those should also be added to Paragraph 23.</p> <p>We consider that Work No.18 Western Noise Bund could be added here. This is associated with the syphons which are not referenced in this paragraph. Reference to the syphons could also be made in this Paragraph There is currently no reference in Schedule 2 which covers syphons.</p> <p>In addition to a flood compensation delivery plan being required which is already set out in the draft wording, we would request that ‘must be submitted to and approved by the relevant planning authority in consultation with the Environment Agency’. Is added to the FRA to both Section (1) and (2) of Paragraph 23.</p> <p>We would request to amend the text ‘flood compensation delivery plan’ to flood compensation and mitigation delivery plan’.</p> <p>It is not clear how the temporary works, such as construction compounds, which are proposed for flood risk areas are covered by a proposed planning requirement? Flood risk should not be increased throughout the duration of the</p>	<p>The FCDP must be approved before the commencement of development of the first of a set of work numbers that are located in the floodplain and could conceivably remove floodplain and therefore increase flood risk. In response to these comments specifically in relation to Work Nos. 36 and 37 the Applicant has updated the DCO Requirement to remove Work No. 25 from this list and to add Work numbers 36(c), 37(b), 37(f-j) and 37(l).</p> <p>As detailed design is developed, further flood modelling will take place which will confirm when the flood compensation elements need to be in place. The FCDP is to ensure that the flood compensation elements are delivered in advance of the relevant works in the flood plain.</p> <p>The FCDP must set out the timeframe for delivering the following elements which are proposed to compensate for the loss of floodplain due to the project and to ensure no increase in flood risk to third parties:</p> <ul style="list-style-type: none"> • Work No. 31(b) (constructing a flood compensation area at Car Park X), • Work No. 38(a) (constructing a flood compensation area at Museum Field) and • Work No. 39(a) (diverting and extending the River Mole) <p>Work No. 18 (the western noise bund) is not required for flood-related mitigation and therefore does not need to be included in the FCDP. The syphons that are required for the western noise bund will be confirmed through the detailed design phase. The detailed designs must be in accordance with the Design Principles [REP2-037] under DCO Requirement 4. Specifically, design principle DDP18 requires syphoned connections to be installed beneath the noise mitigation feature.</p>

Topic	Matter Raised	Applicant's Response
	<p>works and it has been highlighted that at least one of the construction compounds is located within the floodplain.</p> <p>Further provision should be made for the Environment Agency under Schedule 9 Protective Provisions, so we are able to exercise our permissive powers as required throughout the duration of the works.</p>	<p>The Design Principles also require syphons to be incorporated into other relevant detailed designs through DBF 13, DD2, DDP13 and DDP18. As these are secured through the detailed design phase it would not be appropriate for new syphons to be explicitly referenced in Schedule 1 or 2 of the dDCO.</p> <p>In Version 5.0 of the Draft Development Consent Order (Doc Ref. 2.1) Requirement 23 provides that the flood compensation delivery plan (FCDP) must be submitted to and approved by Crawley Borough Council in consultation with the Environment Agency and that the authorised development must be constructed in accordance with this plan unless otherwise agreed in writing with Crawley Borough Council in consultation with the Environment Agency.</p> <p>The Applicant's intention is to retain the wording as a 'Flood Compensation Delivery Plan'. The works compensate for the loss of floodplain due to the Project, mitigation in a wider flood mitigation/alleviation context could be inferred as an intention to provide betterment against the baseline situation.</p> <p>ES Appendix 11.9.6: Flood Risk Assessment Version 2 [AS-078] includes an assessment of flood risk impacts during construction, see Section 7.5. There are construction compounds located within the floodplain which have been taken into account in the hydraulic modelling of the construction periods that has informed the assessment of impact. As reported in the FRA, flood risk would not be increased during the construction period.</p> <p>The Applicant has invited the Environment Agency to share the protective provisions that they consider necessary for consideration.</p>
Draft Development Consent Order	<p>Page 14 (a): Street Works: break up or open the street, or any sewer, drain or tunnel under it.</p> <p>Requirement: For watercourses (i.e. not pipes going to sewage treatment), breaking up should include adequate pollution mitigation, with fine sediment trapping devices e.g. Sedimat or similar to capture fine. There should also be monitoring of silt pollution including baseline check of suspended solids before works start and then a daily check of the suspended solids in the watercourse in comparison to this. Works should cease and fine sediment trapping devices should be adjusted if there is a notable difference from the baseline.</p>	<p>We assume that this comment relates to article 10 of the dDCO. We are not aware of made DCOs which have incorporated the kind of detail on mitigation measures referenced in the EA's comment, and the EA is invited to reference such examples and justify any wording proposed to be included.</p> <p>GAL considers that this matter is adequately addressed through the mitigations specified in ES Appendix 5.3.2: Code of Construction Practice [REP1-021] ("CoCP") and that document's Annex 1 – Water Management Plan [APP-083]. Requirement 7 of the dDCO requires that construction of the authorised development is carried out in accordance with the CoCP (including its annexes). Section 10 of the ES Appendix 5.3.2 Annex 1: Water Management Plan [APP-083] sets out control measures that would be adopted during construction, including those to address the potential of discharge of sediment to watercourses.</p>

Topic	Matter Raised	Applicant's Response
Draft Development Consent Order	Page 21 point 6: Flood Risk Activity Permits will be required for any construction which falls under this area of regulation, in which case the Environmental management of these activities can be considered specifically.	Noted.
Draft Development Consent Order	Page 21 points 8 and 10: The Environment Agency do not own any of the sewers/watercourses involved in the Project scope. Note that existing permits may need revision if the activity changes to the extent that a permit variation might be required. Any variation would be considered on its merits, and it is not a given that the variation would be accepted.	Noted.
Draft Development Consent Order	<p>Page 22 point 10: The Environment Agency is deemed to have granted consent under paragraph (3) where the watercourse, public sewer or drain belongs to the Environment Agency and an environmental permit under regulation 12(1)(b) (requirement for an environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016 has been granted in respect of the discharge.</p> <p>Note: The Environment Agency do not own any of the sewers/watercourses involved in the Project scope</p>	Noted. The Applicant considers that it is appropriate to retain this provision in case the EA were to acquire any watercourses, public sewers or drains within the Order limits prior to completion of construction of the Project. In the event that this does not occur, the provision will not be triggered.
Draft Development Consent Order	Page 23 Point b): Groundwater Investigation Consent may be required to carry out borehole investigations.	Noted.
Draft Development Consent Order	<p>Page 42: Works No. 1:</p> <p>Request for more information: This should reference the additional open culvert extension to the River Mole with associated mitigations.</p>	Works to construct and amend the existing River Mole culvert and syphon that convey the watercourse beneath the runways are included in Work No. 39.
Draft Development Consent Order	Page 46 Work Nos. 30 and 31: – There are limited details here.	Noted. The Applicant will consider whether it is necessary and appropriate to provide further detail.
Draft Development Consent Order	<p>Page 51 (a): divert and extend river course; (b) construct culverts and syphons.</p> <p>Request for more information: These should have grid references and locations specified.</p>	The Works Numbers in Schedule 1 of the draft DCO relate to the Works Plans [AS-129] which show the locations of where each corresponding Work Number may be carried out (under Article 6 of the draft DCO).
Draft Development Consent Order	<p>Page 47 Work no. 35: The widening and realignment of the mainline carriageway of Gatwick Spur/Airport Way, approximately 1740m long, to include a new flyover over the South Terminal Roundabout and the provision of a third lane eastbound on Gatwick Spur between South Terminal Roundabout and M23 Junction 9;</p> <p>Note: This should reference the additional culvert section for the Gatwick Stream.</p>	There is no additional culvert proposed as part of Work Number 35 on the Gatwick Stream. There is a culvert proposed on the Burstow Stream which is included as Work Number 35(x).

Topic	Matter Raised	Applicant's Response
Draft Development Consent Order	<p>Page 50: Works No. 37: The widening and realignment of the existing A23 London Road between Longbridge Roundabout and the A23 London Road bridge over the River Mole, approximately 130m long, to include the provision of three lanes northbound;</p> <p>Note: This should state as bridge rather than culvert.</p>	Work Number 37(a) in the draft Development Consent Order (Doc Ref. 2.1) refers to a bridge not a culvert.
Draft Development Consent Order	<p>Page 50: drainage (n) The modification of the existing A23 Brighton Road Culvert located to the east of the River Mole.</p> <p>Request for more information: The exact modification should be specified. Lengthening? By how much?</p>	The outline highways design assumes that the culvert would be extended by approximately 6 metres, however the exact length of the extension would be subject to detailed design and approval under Requirement 5. It should be noted that this culvert is considered to be a flood relief culvert designed to convey out of bank flows and is dry in non-flood conditions.
Draft Development Consent Order	<p>Page 51 Work no. 43 – to construct water treatment works.</p> <p>This is for a reed bed system which is a form of water treatment works but not as originally described. More details are required before it can be scoped and agreed. Any new discharge activity from a treatment facility will require an Environmental Permit application.</p>	Noted
Draft Development Consent Order	<p>Page 108 SCHEDULE 9 Article 50, Protective Provisions</p> <p>Further provision should be made for the Environment Agency under Schedule 9 Protective Provisions, so we are able to exercise our permissive powers as required throughout the duration of the works.</p> <p>The Environment Agency should have greater mention under this section.</p>	Noted – the EA is invited to please share the provisions that are considered necessary so that the Applicant can review these.
Draft Development Consent Order	<p>55 9-(3) to be amended to read:</p> <p>(3) Where the conclusions of the risk assessment required and approved under sub-paragraph (2) determines that remediation of contamination identified in, on, or under land from detailed site investigations, or as an unexpected discovery, is necessary, a remediation strategy comprising a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the relevant planning authority, following consultation with the Environment Agency on matters related to its functions.</p>	In the Draft Development Consent Order (Doc Ref. 2.1) submitted at Deadline 3, the Applicant has clarified that the determination in Requirement 9(3) will be based on the risk assessment required to be carried out pursuant to Requirement 9(2).

35 Estelle Sexton

35.1.1. Table 35.1 sets out the Applicant’s response to the matters raised in the Written Representation from Estelle Sexton [\[REP1-167\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [\[REP1-048\]](#).

Table 35.1 Response to Written Representation from Estelle Sexton

Topic	Matter Raised	Applicant’s Response
Noise and Vibration	I am supporting the camping to recognise the noise, emissions and inconvenience to the planned expansion at Gatwick. I live in [redacted] and the changes will have a great deal of impact to my home and garden with additional noise from aircraft overhead making a disturbance to our tranquil part of Reigate. I am especially worried about the impact that it will have to the woodland to the rear of our property, which is full of bird life and wildlife. Amazing mix of birds, it is a very balanced ecosystem and it would be tragic if this was disturbed or heaven forbid lost. I strongly oppose all the planning that is associated with the enlargement of the Gatwick airport facilities and the runways.	The Applicant has responded to concerns regarding increased noise, impacts on tranquillity and ecology at Sections 4.22, 4.19 and 4.13 respectively of the of the Relevant Representations Report [REP1-048] .

36 Gareth Hayton

36.1.1. Table 36.1 sets out the Applicant’s response to the matters raised in the Written Representation from Gareth Hayton [\[REP1-169\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [\[REP1-048\]](#).

Table 36.1 Response to Written Representation from Gareth Hayton

Topic	Matter Raised	Applicant’s Response
Policy	Gatwick’s proposal flies in the face of the government’s Levelling Up policy, putting yet more infrastructure and economic capacity in the South East of the country. It does not comply with the findings of the Airports Commission, nor with the Airports National Policy Statement, nor with the government’s Jet Zero policy, nor with the Climate Change Committee’s requirements.	The Applicant’s Need Case [APP-250] makes clear that the application does not assume any increase in the share of aviation demand catered for in the south-east. The Applicant considers the proposals to be directly consistent with the policy expressed in the ANPS at paragraph 1.39 that airports beyond Heathrow should make best use of their existing runways. Compliance with the Government’s policies set out in the Jet Zero Strategy is explained in the Planning Statement [APP-245] at Section 8.7.
General	Gatwick claim 78% of “local” people support its expansion. This is extremely surprising. In 2013/14 Gatwick wanted to put their three alternative proposals for a second runway to local people in a series of presentations all around the airport. Attendees were to be asked which of the three alternative runway	The survey referred to in the response was the most recent commissioned by the Applicant between 18 th May and 1 st June 2023. This has been conducted separately from any consultations undertaken as part of the DCO application process.

Topic	Matter Raised	Applicant's Response
	<p>proposals they preferred. Gatwick at the last minute succumbed to pressure and included a fourth option – none of the above.</p> <p>Nevertheless, 66% of respondents chose the option hidden away on page 16 of the glossy brochure and rejected all of Gatwick's proposals for expansion. Attitudes have hardened since then due to ever increasing flights, traffic, noise, pollution and the ongoing failure of Gatwick's Noise Management Board to address public concerns. Yet astonishingly Gatwick now claim that 78% of local people support expansion. This figure was arrived at by a YouGov poll following exhibitions by Gatwick, So what has bought about this dramatic turn around in public opinion? There appear to be six reasons:</p> <ol style="list-style-type: none"> 1. Gatwick asked an over simplistic question, whether the respondents supported “,,plans to bring its standby runway into routine use.” No reference at was made as to what this would entail. 2. The exhibitions were held in areas where the negative effects of the airport are not apparent. The operational axis of the airport is east/west, yet the two principal exhibitions were held some distance away to the north and south of the airport in Croydon and Brighton, neither of which are overflowed, nor could they be said to be especially affected by Gatwick road traffic, noise, or air pollution, the former being in greater London and the latter on the south coast. 3. Croydon and Brighton are centres of population that have lower cost housing and a higher proportion of Gatwick's largely lower paid workforce live in these two urban centres. 4. The remaining exhibitions were held in towns which are not overflowed, but are also home to significant numbers of Gatwick workers, EG Horley and Horsham. 5. Gatwick then massaged the resultant figures by excluding the high proportion of respondents who did not express an opinion, presenting the results with a caveat as “78% of local people <i>who expressed an opinion</i> support airport expansion.” 6. In reality about 600 people, about 13% of those who responded to the poll, “strongly support” the proposal. That is not “78% of local people” and is totally insignificant given the population in the area around the airport. 	<p>The survey was conducted via online interviews administered to members of the YouGov Plc UK panel (over 2.5 million individuals) with the total sample size of the survey being 3,180 adults (age 18+) living in Croydon, Surrey, Kent or Sussex. Of those 3,180 respondents, 1,716 respondents expressed an opinion in support or opposition for the Applicant's plans to bring its standby runway into route use alongside its main runway. The remaining 1,464 respondents did not express an opinion. Of this sample, 78% of respondents indicated they were in favour of the NRP proposals (either 'strongly support' or 'tend to support', with 22% of respondents in opposition (either 'strongly oppose' or 'tend to oppose').</p>

Topic	Matter Raised	Applicant's Response
General	<p>The Airports Commission's report stated that airports other than Heathrow were "... to make best use of existing infrastructure." The amount of new infrastructure now proposed by the applicant is out of all proportion to the narrow strip of existing tarmac which "best use" is to be made of.</p> <p>The findings of the Airports Commission was that Heathrow was to be the site of principal expansion, not Gatwick. Nor is the current proposal all that is needed, it is likely the thin end of a wedge for Heathrow currently has five terminals whereas Gatwick has just two. If a second runway were to go ahead it seems highly likely that Gatwick's two terminals would be insufficient to handle the same number of passengers as Heathrow's five terminals do now and so further development would be needed, yet there is no mention of this requirement.</p>	<p>The DCO Application proposals include enhancements to the existing terminal buildings at Gatwick but there is no proposal for additional terminal buildings and no such proposal is necessary to cater for the forecast growth at Gatwick.</p>
Noise	<p>Gatwick have claimed that a reduction in individual aircraft noise of 2dBA will offset the increased number of flights they are proposing. This is totally unrealistic and is not accepted. The human ear can barely differentiate a change of 2dBA and most people will not notice the slight reduction, but they will most certainly notice an increase of up to 105,000 unwelcome noise events per annum.</p>	<p>The reduction in 2dB stated in the representation may be a reference to next generation aircraft being quieter than current aircraft. This has been factored into the noise modelling for future years and, as reported in ES Chapter 14: Noise and Vibration [APP-039], goes some way to offsetting increased in noise over time. The assessment includes quantification of the additional number of noise events the Project is expected to generate above Lmax 65dB in the day (N65) and above Lmax 60dB at night (N60), see for example paragraphs 14.9.152 to 14.9.158 which provides this for the 7 community representative locations. The online noise viewer provides this information for all postcodes in the area.</p>
Noise: Night Flights	<p>At 15,000 per annum Gatwick already has more night flights than any other airport in the country, and most of them in the summer when windows need to be open at night, something that climate change is exacerbating. Gatwick claim that three aircraft rotations per day is part of their business model and that night flights are essential. Interrupted sleep has been proven to be detrimental to human health. Regardless of any business model, new developments should not facilitate activities that are now known to be damaging to human health.</p>	<p>The Applicant has responded to the concerns regarding night noise within Section 4.22 of the Relevant Representations Report [REP1-048] under the heading Concern about the impact of future increases in levels of noise as a result of the Proposed Development.</p>
Surface Transport	<p>Gatwick is served by the Brighton line. This is already a very busy line which is frequently standing room only now and it is understood it may not be expanded due to physical constraints north of the airport. The increased passenger capacity necessary for the proposal is simply unavailable via the rail connection.</p> <p>International airports are invariably connected to the mass transit systems of the cities that they serve, the Paris Metro, New York Subway etc etc. The</p>	<p>The assessment for the Project shows that there is no significant adverse impact on rail services. The assessment highlights that rail services are typically busiest northbound towards London in the morning peak, and southbound towards Gatwick in the afternoon peak. In general, the greatest increases in patronage related to the Project will be in the counter-peak direction.</p> <p>Gatwick Airport station is well connected to the London Underground, including fast</p>

Topic	Matter Raised	Applicant's Response
	<p>London Underground is the capital's mass transit system, and in a low carbon future mass transit will become increasingly important. The Underground is amongst the largest such systems in the world with 252 miles of track, 272 stations and it carries around five million passengers a day. You would expect it to connect to London Gatwick, but there is no connection the airport. The nearest tube station is 20 miles away</p>	<p>services to London Victoria and London Bridge stations, as well as through services on the Thameslink.</p>
Surface Transport	<p>Because of the limited rail and non existent Underground connections outlined above most passengers and staff will access the airport by road. Gatwick is served from the north by the M23 alone, and from the south by the A23. Access from east and west from south of the M25 is extremely poor. For example, rather than travel around three sides of a square, traffic from the areas south west of the M25 converges on to the A25 outside Guildford heading east, then via a variety of country lanes to the south of that road, through an area of National Landscape (formally known as an AONB) to access Gatwick. The village of Charlwood is just one of the necks of this funnel as it were. A 2018 traffic survey in the village revealed more than 54,000 vehicles a week were using The Street, an unclassified road through the village. Expansion of the airport is going to worsen this unacceptable situation on a large number of totally unsuitable rural roads and lanes both east and west of the airport.</p>	<p>As set out in paragraph 2.1.5 of ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] document, in pursuing an increase in public transport mode share, Gatwick has consistently out-performed other major UK airports over the last 10-15 years, seeing considerable growth in the percentage of trips using sustainable modes, where other London airports have experienced lower or little improvement in mode shares.</p> <p>The highway model used for the assessment covers a large area around Gatwick and examines the impact of the additional traffic arising from the Project. The assessment considers the impacts indicated by the highway model and uses the ES assessment criteria (identified in Section 12.4 of ES Chapter 12: Traffic and Transport [AS-076] to determine whether these impacts would give rise to significant adverse effects that would require mitigation.</p> <p>In terms of the comment regarding Charlwood, Diagrams 12.3.2 and 12.3.3 of the Transport Assessment [AS-079] indicate the proportion of airport traffic on the wider highway network, which shows the majority dissipates along the strategic highway network</p>
Water Environment	<p>Increasing the numbers of passengers using Gatwick, doubling the area of parking, and increasing the area of concrete and tarmac will put an increased load on the drainage systems for both surface water and foul drainage. Climate change will increase heavy rainfall and therefore increase the load and the risk of pollution on the River Mole.</p>	<p>Surface Water Drainage</p> <p>ES Appendix 11.9.6: Flood Risk Assessment [AS-078] demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase. The Project incorporates SuDS and attenuation measures to restrict runoff rates and provide storage of additional runoff.</p> <p>The Project complies with the Environment Agency's guidance on the consideration of the predicted impacts of climate change, see Section 3.7 of the ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The mitigation measures will ensure no increase in flood risk to other parties for the lifetime of the development, including an allowance for the predicted impacts of climate change. See Table 11.8.1 of ES Chapter 11: Water Environment [APP-036].</p>

Topic	Matter Raised	Applicant's Response
		<p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation</p>

Topic	Matter Raised	Applicant's Response
		<p>and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p>
Socio-Economics: Housing	<p>Gatwick's proposal states that 14,000 additional workers will be needed, a figure that is questionable due to increasing automation and AI, but if it is correct, where will these new workers come from and where will they live? Gatwick is an area of low unemployment and with a shortage of housing for purchase or rental, together with already stretched schooling and medical facilities. Additionally environmental damage has been found to be caused by a falling water table due to previous excessive water abstraction. Because of this there is currently a moratorium on other than water neutral development over much of the area. If the new workforce commutes from further afield then there are additional carbon emissions, traffic congestion and pollution considerations.</p>	<p>The 14,000 workers will be in jobs spread across a wide area – the six Local Authorities (Croydon, East and West Sussex, Surrey, Kent and Brighton). The Applicant estimates there will be just over 3,000 jobs on-site. This estimate takes account of productivity. An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p> <p>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201] address the issue of Water and Nutrient Neutrality in Section 4.3.</p> <p>The Applicant has responded to concerns that air quality will worsen as a result of the NRP at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>Section 16.4.28 of the ES Chapter 16: Greenhouse Gases [APP-041] sets out the methodology for estimating emissions arising from Construction. Emissions associated with the transport of workers is estimated at approximately 2% of Construction related emissions. Should the workforce commute from further afield then the GHG emissions associated with this would increase, but it is not expected that the increase would be so great as to affect the conclusions of the GHG assessment.</p>

Topic	Matter Raised	Applicant's Response
Climate Change	<p>It is notable that none of the local councils adjacent to Gatwick support its expansion. When West Sussex County Council debated the matter it was stated that Gatwick's expansion was the single most environmentally damaging planning proposal that had ever come before the Council. This is typical of the view expressed by other councils, most of which have formally recognised that there is a climate emergency and that they must respond to it.</p>	<p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in Paragraph 16.10.4 of ES Chapter 16: Greenhouse Gases [APP-041] that references the IEMA Guidance noting that "<i>The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that 'effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other'.</i>"</p>
Climate Change	<p>The elephant in the room. Gatwick airport prides itself that it has a relatively low carbon footprint but this is completely irrelevant. Gatwick's sole purpose is to facilitate aviation, the proposal seeks to expand that. Minute by minute flying is the most environmentally damaging activity that humans undertake and extraordinarily difficult to de-carbonise. While most businesses and the majority of people are on a successful drive to reduce carbon emissions, Gatwick's proposal is the reverse, increasing emissions by over one million tons of CO2 per annum. This is totally unacceptable. If aviation is to be expanded then a means of making it carbon neutral needs to be found first. This is very difficult and may require entirely new technology. We are probably 20 plus years away from achieving carbon neutral aviation on a commercial long distance scale and until we do there should be demand limiting as proposed by the Climate Change Commission, not further airport expansion.</p>	<p>The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government's target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government's most recent response responded to the Progress Report 2022.</p> <p>The Government responded directly to the 2022 recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> • "197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway. • Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict

Topic	Matter Raised	Applicant's Response
		<p><i>environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</i></p> <p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • <i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. • The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. • If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK’s overall 2050 net zero target.”</i>
Greenhouse Gases	<p>An application to drill for oil, coincidentally not far from Gatwick, is currently being considered by the Supreme Court having been through the planning process, the High Court and the Court of Appeal. The matter hinges around whether the downstream emissions from a development need to be considered in the Environmental Impact Statement. The applicant, Sarah Finch maintains that they do, whereas current planning requirements require that they do not. The Supreme Court’s decision is therefore relevant to the DCO application because the downstream emissions from Gatwick’s proposal are over 1m tons of CO2 emissions per annum.</p>	<p>The case of <i>R (oao Finch on behalf of the Weald Action Group) v Surrey County Council and others</i> regarding the grant of planning permission for commercial extraction of crude oil at Horse Hill was heard by the Supreme Court in June 2023 and judgment is awaited.</p> <p>Both the High Court and Court of Appeal rejected Mrs Finch’s claim that Surrey County Council erred in law by not requiring the EIA of downstream emissions of oil extracted. Upholding the High Court’s conclusion, the Court of Appeal held that whether downstream emissions needed to be assessed was a question of fact and evaluative judgment for the planning authority, challengeable only on a public law irrationality basis.’</p> <p>This development challenged in Finch – a facility for the extraction of hydrocarbons – differs significantly from the Northern Runway Project. In any event, and as detailed in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041], the EIA for the Northern Runway Project has taken a conservative approach to assessing GHG emissions to avoid underestimation of impact. The assessment factors in all emissions from the take-off, climb, cruise and descent and landing stages of outward flights.</p>
Greenhouse Gases	<p>Absolute zero, the lowest temperature that can be achieved is -272C. Hydrogen evaporates just above this at -256C at atmospheric pressure. It must be kept below this temperature or be pressurised to above about 8,000 psi/550</p>	<p>The Applicant has responded thematically to comments made within relevant representations on the Jet Zero position on uncertainty around future technological</p>

Topic	Matter Raised	Applicant's Response
	<p>bar, to remain in liquid state. Being in the dense liquid state is the only way that the gas can contain sufficient energy to fuel an aircraft over even modest distances.</p> <p>Gatwick makes much of using hydrogen as a fuel, and maintains that in the near future its use will remove the greenhouse gas emissions from flying. Gatwick cites that it has buses running on this fuel now. Having a bus running on hydrogen is reasonably straightforward; the bus has a limited daily range, can refuel during its daily operation if needed, operates in a relatively narrow temperature range and has no significant volume or weight considerations. If there is a failure of the safety features, the bus can stop and the passengers may disembark.</p> <p>An aircraft has entirely different requirements, passenger space must be maximised and weight kept to a minimum. An aircraft must also accommodate huge temperature variations, from +55C on the tarmac in Dubai to -70C at 35,000 feet, together with significant air pressure variations. Added to which is the overriding problem that the passengers may only disembark once the plane has safely landed.</p> <p>The ultra low temperature refrigeration needed – cryogenics – is complex, bulky and heavy. Very high pressure vessels, which the hydrogen tanks would certainly be, would need to be spherical to accommodate the huge pressure and temperature differences they would be subjected to. This would preclude the use of conventional wing tanks. Hydrogen is highly flammable and under immense pressure it poses great safety problems.</p> <p>Additionally, the airport is currently continuously supplied with aviation fuel via a 8” diameter pipe pumped under pressure from the Fawley oil refinery, near Southampton. This would be unsuitable for hydrogen and all the alternative fuel would need to arrive by road, adding to congestion, emissions, and worsening air quality.</p> <p>Gatwick seeks to gloss over all these huge difficulties, clinging to the totally unrealistic holy grail that hydrogen fuelled long haul aircraft will be in common use in the near future.</p>	<p>development at Section 4.16 of the Relevant Representations Report [REP1-048].</p>

37 Gatwick Area Conservation Campaign (GACC)

37.1.1. Table 37.1 sets out the Applicant's response to the matters raised in the Written Representation from GACC [REP1-173]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 37.1 Response to Written Representation from GACC

Topic	Matter Raised	Applicant's Response
General: Future Baseline	<p>Increase from 40.9m in 2023 to 80.2m in 2047 is an increase of around 39m passengers per annum. GAL has compared environmental impacts against a future baseline of 67.2 mppa in 2047, just 1/3 of the increase from 2023.</p> <p>Environmental Assessment guidance is that assessment should be against the realistic worse case. This has not been done.</p> <p>The modelling, scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen.</p>	<p>The Applicant has responded directly to GACC's point on the future baseline at Section 3.36 of the Relevant Representations Report [REP1-048].</p> <p>It is clearly material that the airport is currently uncapped in relation to both air traffic movements and passenger numbers. An important consequence is the expectation that Gatwick will continue to grow existing aircraft and passenger numbers incrementally through a combination of steady increases in aircraft size and load capacity together with growth in runway use in off-peak periods.</p> <p>The assumptions and forecasts for this incremental growth are set out in the submitted Needs Case [APP-250] at Section 6.3. It is estimated that Gatwick will grow to be able to serve some 67.2 mppa in 2047 – an increase of around 20 million passengers (30%) on 2019 levels. Aircraft movements are forecast to grow to approximately 326,000 commercial ATMs, reflecting an increase of around 10% compared to 2019 throughput. The submitted evidence shows that the demand exists for this incremental increase in capacity, which can be achieved without the grant of further planning permissions.</p> <p>It does follow that the net impact of the Northern Runway Project would be an increase in ATMs and passenger numbers above that which can be achieved in the future baseline. The same documents show this to be a forecast increase of c.13 mppa and c.60,000 flights per annum. The impact of that net increase is fully assessed in the submitted Environmental Statement.</p> <p>Further detail on the future baseline has also been provided by the Applicant at Deadline 1 Technical Note on Future Baseline [REP1-047].</p>
Transport	<p>GAL should define and model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere.</p>	<p>The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of The Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 4: Surface Transport [REP1-059].</p>

Topic	Matter Raised	Applicant's Response
	<p>Local traffic congestion and parking impacts in and around Gatwick should not be worse.</p> <p>As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality.</p>	
Night Flights	No Night Flights as this area of existing impact is unacceptable.	<p>The Applicant has responded directly to GACC's point on night flights at Section 3.36 of the Relevant Representations Report [REP1-048].</p> <p>Night flying controls at Gatwick are a matter for government.</p> <p>The aircraft noise assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the total number of people affected by noise at night with the Project will be less than in the 2019 baseline. This is not the case for daytime as discussed elsewhere.</p> <p>The Government has recently published proposals for consultation which would extend the current night regime at Gatwick to 2028.</p>
Noise Limits	Stronger noise limits and mitigation scheme.	The Applicant has responded directly to GACC's point on the noise limits and mitigation in Section 3.36 of the Relevant Representations Report [REP1-048] .
Flooding and Foul Water	Address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding	The Applicant has responded directly to GACC's point regarding the impact on wastewater and surface water flooding at Section 3.36 of the Relevant Representations Report [REP1-048] .
Section 106 Agreement	<p>Gatwick has not taken seriously its impact on the environment and must sign a new Section 106 agreement, agreeing conditions to limit all these impacts, regardless of whether the airport is expanded or not.</p> <p>This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.</p>	<p>The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, Section 106 Agreement or other consents and licences.</p> <p>The Draft Section 106 Agreement [REP2-004] once finalised and entered into will only apply to the Airport in the event that the DCO is granted and then implemented. The Applicant is in discussions with Crawley Borough Council and West Sussex County Council about a new Section 106 Agreement that would apply</p>

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		to the airport following the expiration of the 2022 Agreement and prior to the DCO Section 106 Agreement taking effect.
Climate Change	<p>Gatwick must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact.</p> <p>Increasing Gatwick to the size of Heathrow would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.</p> <p>There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should not be supported on climate grounds alone.</p>	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Policy	<p>The Secretary of State should accept that the Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018) is now out-of-date, specifically with respect to climate change. This should be updated before the Secretary of State makes the decision.</p>	<p>Existing policies are up to date – they have been confirmed as being up to date by the Government itself – for example in its Jet Zero Strategy and through its recent decisions on airport expansion proposals.</p>
Need	<p>GACC challenges the economic assessment made by GAL. This submission includes concerns raised by New Economics Foundation in their relevant representation. GACC believe that the economic benefits are overstated by the applicant, and the economic and environmental downsides are understated. When the relevant scheme costs, benefits, their balance of equity, and the long-term societal risks are taken into account, the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and international wellbeing. Many of the arguments set out here are supported by evidence set out in NEF's recent report titled Losing Altitude: The Economics of Air Transport in Great Britain.</p> <p>The ANPS (Airports National Policy Statement, 2018) requires airports seeking to expand (other than Heathrow) to demonstrate sufficient need, additional to (or different from) that met by provision of the Northwest Runway at Heathrow. Gatwick has not done this.</p> <p>Gatwick should also provide the data and assessment to justify the need for increased use of its existing runway above 2019 levels, without development of the Northern runway. This should be contrasted with historic growth rates of flights and passengers (including allowance for Covid impacts), global economic trends, increasing awareness and need for legislation to limit aviation's climate impacts and changes in how international business operates.</p>	<p>The Applicant has responded directly to GACC's point regarding the demonstration of sufficient need at Section 3.36 of the Relevant Representations Report [REP1-048].</p>

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	<p>It is unlikely that any additional capacity or the Northern Runway will ever be needed.</p> <p>The future baseline currently used for comparison in the DCO itself represents a massive increase in flights and passengers. GACC are not yet confident that Gatwick's future baseline air traffic movements and passenger volumes are achievable, or whether they are supported by sufficient physical infrastructure in the 'without project' (future baseline) case. All assessments, including the EIA, should assess the aggregate impacts associated with both increased use of the existing runway and those associated with the Northern Runway, so the overall impacts of Gatwick's planned growth can be clearly understood against the current level of flights and passengers using the airport.</p>	
Socio-Economics	Overstatement of benefits due to business passenger numbers.	The Applicant has responded directly to GACC's point regarding national impacts assessment at Section 3.36 of the Relevant Representations Report [REP1-048] .
Socio-Economics	No disaggregation of benefits arising to UK and non-UK residents.	The Applicant has responded directly to GACC's point regarding disaggregation of benefits at Section 3.58 of the Relevant Representations Report [REP1-048] .
Need and Forecasting	Displacement of business travellers from other airports has no overall UK economic benefit.	The Applicant has responded directly to GACC's point regarding displacement of business passengers at Section 3.36 of the Relevant Representations Report [REP1-048] .
Need and Forecasting	<p>No evidence supporting "output change in imperfectly competitive markets". Analysis should distinguish how much business travel:</p> <ul style="list-style-type: none"> • Benefits to UK residents against non-UK residents • Is displaced from other UK airports, so no change in UK benefit; and • Is constrained (as opposed to leisure travel) in GAL's future baseline case – i.e. how much business travel occurs within the future baseline as opposed to within the additional project related increase in air passenger numbers. 	The Applicant has responded directly to GACC's point regarding business travel at Section 3.36 of the Relevant Representations Report [REP1-048] .
General: Terminal and Land Requirements	GACC would therefore request that GAL explain how they can accommodate such growth in passenger numbers at Gatwick with the terminal, pier and stand capacities set out in this DCO application. If Gatwick actually intend to construct a new terminal, as the existing terminals appear to be inadequate to support the proposed increase in passenger throughput, then this should be included as part of this application. Not including it at this stage risks masking the overall land-take required for the development, such as through shifting buildings and infrastructure that is currently within the red line that denotes the	The Applicant does not intend to build a new terminal but rather to expand the existing North and South Terminals to make the best use of their combined residual capacity. A range of terminal options, including a third, additional building were considered, a summary of which can be found in Section 3.6.33 of ES Chapter 3: Alternatives Considered [APP-028] , Table 1. 5. 1 ES: Appendix 3.5.1 Option Appraisal Tables [APP-073] , and Figure 3.3.4 in ES: Alternatives Considered Figures [APP-049] . The Applicant has provided further information

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	<p>extent of this development beyond this boundary. The ecological and other impacts of wider development, should they be needed as a direct consequence of this development, should be able to be assessed so the worse case impact to the surrounding area is understood through this DCO examination.</p> <p>GAL are still seeking to safeguard land for what they describe as a future second runway to the South of the airport. The GAL 2019 Masterplan notes that this would increase passenger numbers to 95 mppa. GAL should confirm whether this envisaged capacity is still correct. GACC contend that this safeguarding should be specifically struck out of consideration as part of this DCO, before the existing scheme is permitted. This should be explicated excluded from the Section 106 agreement.</p> <p>GACC request that GAL confirm what additional buildings, and infrastructure, and such land requirements would be required to increase the airport to a capacity of 386,000 ATMs and 80.2 million passengers each year, and how this is reflected in their environmental statement.</p> <p>GACC would like GAL to confirm the ecological impact has been assessed for the land proposed to be used as construction sites for the project, inclusive of access routes, including both Riverside Garden Park and use of the land to the north of the South Terminal Roundabout.</p> <p>GAL should demonstrate that sufficient surface infrastructure (e.g. terminals, stands, piers, car parking, hotels, offices) have been provided to fully accommodate the level of growth set out in both the future baseline, and the project case.</p>	<p>regarding terminal capacity in response to ExA question GEN.1.17, Applicant's Responses to ExQ1 (Doc Ref. 10.16).</p> <p>Land to the south of the existing runway at Gatwick has been safeguarded through local planning policy for a new full length additional runway after it was first required to be safeguarded in the Government's 2003 Aviation White Paper – The Future of Air Transport (Dec 2003), DFT, para 11.11. This requirement was adopted into local planning policy through the Crawley Borough Council Core Strategy in 2007 and restated again in the adopted Crawley Borough Local Plan (2015 – 2030) published in December 2015 (see Chapter 9 and policy GAT2).</p> <p>The current Gatwick Airport Master Plan was published in July 2019 and confirmed that Gatwick is no longer actively pursuing plans for an additional runway to the south, but nevertheless also confirmed that there remains a possibility of building and operating one in the future. Following an extensive amount of work undertaken during the Airports Commission process in 2015, no further work has been undertaken by GAL on reviewing the capability of a new additional runway to the south of the existing airport. However, the Master Plan acknowledges (para 5.4.5) that any additional new runway to the south of the airport to provide a new full length runway at sufficient separation from the existing main runway to allow independent runway operations would add significant additional capacity to the airport. Any proposal to bring forward a new additional runway to the south of the existing airport would in itself, require the submission of an application for a Development Consent Order under the 2008 Planning Act and would require its own environmental impact assessment and supporting documentation.</p> <p>The safeguarding of land is considered as part of the local plan making process and there is no requirement for the safeguarding of land for a new additional runway to the south of the airport to be considered as part of the current DCO planning process. Indeed, the Draft Crawley Borough Local Plan (2024 – 2040) Submission Publication Consultation May – June 2023, (which is currently being independently examined by the Secretary of State) is considering land safeguarding. The Draft Local Plan confirms that land at Gatwick is still required to be safeguarded for a potential southern runway (see para 10.17 and 10.18) and, as such, draft policy GAT2 continues to identify a significant amount of land that is safeguarded from development which would be incompatible with the expansion of the airport to accommodate the construction of an additional wide spaced runway. Following public hearings in November 2023 and January 2024, the Inspectors set out their initial preliminary findings including on the Draft Local Plan's general</p>

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		<p>approach to Gatwick Airport being sound albeit matters of detail need to be addressed. The Draft Local Plan is currently under-going further consultation on the Main Modifications, but with the principle of continued safeguarding having been established.</p> <p>Section 5.2 of ES Chapter 5: Project Description [REP1-016] summarises all the key components of the Project, including airfield works, reconfiguration and extensions to the existing terminals to facilitate additional passenger processing, works to existing and construction of additional aircraft parking stands and a new pier and works to existing and construction of new hotels, office and car parks. The proposals are further detailed and illustrated in Section 5.7 of the Design and Access Statement - Volume 3 [APP-255] (Northern Campus) and Section 5.10 of the Design and Access Statement – Volume 4 [APP-256] (Southern Campus). These works will allow the airport to handle the additional ATMs and passenger and all of them, including temporary works such as construction compounds, have been included in the environmental assessments.</p>
<p>Greenhouse Gases; Future Baseline</p>	<p>GACC is concerned that an over-optimistic estimate of what the without project 'future baseline' is could lead to the increased flights and passengers associated with the project to be understated. However, the environmental impact should (as highlighted by questions from the ExA in ISH4) be measured against the current extent of environmental impacts to the full as project case.</p> <p>Referencing the Horse Hill Supreme Court case, GACC contend that the environmental impact assessment should consider the impact of enabling flights just as drilling for oil must consider the impact of its downstream emissions: burning oil.</p> <p>This should be reflected in the Section 106 Agreement and applied to all areas where the project has environmental affects that should be controlled.</p> <p>GACC would like to reiterate the comments made to pre-examination hearing regarding sufficiency of data sets and information shared by GAL to enable full examination of the DCO application. GACC contend that so far Insufficient detail has been provided by GAL and that this lack of sharing of what underpins their submission, risks putting the overall effectiveness of the DCO examination in to jeopardy.</p>	<p>The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment (APP-031), and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42.</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>The case of <i>R (oao Finch on behalf of the Weald Action Group) v Surrey County Council and others</i> regarding the grant of planning permission for commercial extraction of crude oil at Horse Hill was heard by the Supreme Court in June 2023 and judgment is awaited.</p> <p>Both the High Court and Court of Appeal rejected Mrs Finch's claim that Surrey County Council erred in law by not requiring the EIA of downstream emissions of oil extracted. Upholding the High Court's conclusion, the Court of Appeal held that whether downstream emissions needed to be assessed was a question of fact and</p>

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		<p>evaluative judgment for the planning authority, challengeable only on a public law irrationality basis. A majority of the court upheld the Council's approach as lawful.</p> <p>The development challenged in Finch – a facility for the extraction of hydrocarbons – differs significantly from the Northern Runway Project. In any event, and as detailed in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041], the EIA for the Northern Runway Project has taken a conservative approach to assessing GHG emissions to avoid underestimation of impact. The assessment factors in all emissions from the take-off, climb, cruise and descent and landing stages of outward flights.</p>
Ecology	<p>GAL should provide a full schedule setting out the type and total area of habitat that would be lost, and the subsequent mitigation and compensation, for each of these habitats in turn.</p> <p>GACC shares Sussex Wildlife Trust's concern that there is currently a lack of a landscape scale approach to assessing impacts. GAL set out how they have assessed the biodiversity impacts of the time lag between habitat loss and subsequent habitat creation and maturity, particularly with respect to woodland. GAL to set out how Biodiversity Net Gain (BNG) is to be delivered, such as to ensure it is separate from and additional to requirements under the mitigation hierarchy. GAL should provide full details to ensure appropriate monitoring and management of newly created habitats. GAL should provide details of the alternative site assessment for consideration of the alternative ecological sites to offset the sites that would be lost as a result of this project.</p> <p>The assessment of ecological impact of increased flood risk (including due to Thames Water sewage works outfalls in the River Mole and tributaries) and the impact on water resource neutrality of the additional water extraction proposed for this project should be fully assessed. GAL request that the Phase 1 Habitat Survey be extended to cover the extent of the River Mole and other watercourses whose ecology is impacted by this major development, so the full impact is understood and can be mitigated</p>	<p>The Applicant has responded directly to GACC's point regarding the timing of habitat creation at Section 3.36 of the Relevant Representations Report [REP1-048].</p> <p>As set out in Section 9.4.6 <i>et seq.</i> in ES Chapter 9: Ecology and Nature Conservation [APP-034], the study area considered the landscape surrounding the Project and, where necessary, surveys were undertaken for mobile species away from the Project site. This included with respect to bats, where a landscape-scale radio tracking study was completed and is reported in ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys [APP-131, APP-132]. This ensured that there could be consideration of potential effects at a landscape scale.</p> <p>The approach of the Project to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136].</p> <p>Details of monitoring and management of newly-created habitats are set out in ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan [REP2-021], [REP2-023], [REP2-025], and [REP2-027]</p> <p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project.</p> <p>Separately to the Project, Gatwick is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of</p>

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		<p>Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, Gatwick does not envisage a scenario when it would develop a new local source of water.</p> <p>The habitat surveys completed as part of the Project included those areas where potential effects could be identified. Surveys of the River Mole were conducted outwith the Project site for riparian mammals that could move onto the site. These are reported in ES Appendix 9.6.2: Ecology Survey Report [APP-124]- [APP-130].</p>
Surface Transport	<p>Gatwick Airport Limited (GAL) surface transport proposals suggest low commitment to sustainable travel, with weak sustainable travel targets leading to an increase in car traffic. The proposals will lead to increased highway travel times and increased crowding on busy mainline rail services.</p> <p>The proposals from Gatwick Airport need to be honest in that they are adding highway transport capacity, which could encourage car use in travel to/from the airport. Additional highway capacity can provide, at best, a short-term benefit in reducing congestion and improving journey times, but the benefit will erode, as new or more traffic is attracted by the extra capacity which gradually fills until rising congestion again acts as a deterrent. The net effect is more traffic on the roads, and precisely the opposite of the transport response required to tackle the climate emergency and other environmental targets (including through a modal shift to walking and cycling, buses and trains).</p> <p>GACC's view is that the DCO is incorrect to have responded to National Highways to increase road transport capacity (reducing congestion and therefore incentivising car travel both for airport and non-airport related journeys) whilst ignoring completely calls for increased public transport modal share from that set out in the GAL 2021 consultation and completely ignoring calls for increased investment in greater public transport capacity (principally rail, but also bus and coach). Instead the GAL 2022 consultation and subsequent DCO have watered down the public transport modal shift targets, and failed to back up even this poorer ambition with meaningful investment</p>	<p>The Applicant has responded directly to GACC's points at Section 3.36 of the Relevant Representations Report [REP1-048], including in relation to investment in sustainable travel and rail capacity.</p> <p>The Applicant is committed to supporting sustainable travel, as set out in ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090]. The mode share commitments within the SAC represent the position the Applicant is committed to achieve, based on the modelling of mode choice and transport network operation, to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport [AS-076] and in the Transport Assessment [AS-079] are delivered. There are further aspirations identified in the SAC which acknowledges that there may be further opportunities to enhance public transport services and the Applicant is committed to using the Sustainable Transport Fund to support measures that will help to achieve the mode share commitments.</p> <p>In response to the additional comments made by GACC: No car growth - The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of The Applicant's Written Summary of Oral Submissions from ISH4 Surface Transport [REP1 059].</p> <p>The Applicant has responded thematically to comments made within relevant representations regarding car parking at Section 4.26 of its Relevant Representations Report [REP1-048]. The Project will result in net increase of</p>

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	<p>proposals. Overall this will lead to increased surface transport carbon emissions.</p> <p>It is unclear why GAL has produced this particular transport plan. What objectives were GAL trying to meet, what ranges of alternative transport plans were tested and what criteria were used to assess the alternatives? Was a no car growth scenario examined and tested and, if so, why was it rejected? If not, why was this not considered, with expenditure directed to improve rail and bus/coach access rather to expand overall highway capacity?</p> <p>Why has GAL chosen mode share targets that allow car growth, and a parking strategy that includes additional car parking spaces? Why has GAL put forward a transport strategy that includes major highway changes that increase highway capacity and also has increased the supply of car parking? Would a lower car growth strategy remove the need for the major highway works included with the project and release funding that could then be applied to improved sustainable transport measures?</p> <p>Network Rail noted that Gatwick rail station capacity improvements were designed to accommodate demand up to 2036 and did not include the additional passengers associated with the Northern Runway Project. This throws doubt on the ability of Gatwick station to accommodate the levels of demand resulting from the project. What operational strategies would be implemented on occasions when the station became overcrowded and what impact would these have on train services?</p>	<p>1,100 spaces, which is equivalent to a 2% increase on the future baseline car parking provision.</p> <p>The capacity and performance of Gatwick Airport station with and without the Project has been assessed, as set out in Chapter 10 of the Transport Assessment [AS-079] and in Transport Assessment Annex D – Station and Shuttle Legion Modelling Report [APP-262], which demonstrated that the Project does not require any additional mitigation at the station.</p>
Climate Change	<p>The submission by GAL understates the increased carbon emissions associated with the proposed expansion of Gatwick Airport, and underplays their significance. This DCO would clearly have a material impact of the ability of the UK to meet its carbon reduction targets, and future carbon budgets. If expansion were permitted Gatwick alone would be responsible for over 3-5% of the UK's sixth carbon budget, with or without Jet Zero mitigations. Approval would require government to ignore the Climate Change Committee's 2023 Progress Review recommendation to not permit any airport expansion without a UK-wide capacity-management framework being in place.</p> <p>Planning must consider significance of emissions from all airport expansions not just on a case-by-case basis. Significance should be assessed against the 1.5°C compliance trajectory as in Institute of Environmental Management and</p>	<p>The Applicant has responded directly to GACC's point regarding: the increase in Carbon Emissions; assessment against a 1.5°C compliant trajectory; and compliance with the Aviation Strategy: Making Best Use of Existing Runways (2018); impacts from surface access; and mitigation of construction emissions at Section 3.36 of the Relevant Representations Report [REP1-048].</p> <p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>

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	<p>Assessment (IEMA) guidance (Assessing GHG emissions and their significance, 2022).</p> <p>GAL should be required to assess the cumulative impact of its plans against the internationally accepted 1.5°C limit on global temperature increase and the UK government's legal requirement to limit greenhouse emissions to net zero by 2050. Gatwick Airport needs to explain how expanding one of the hardest to decarbonise sectors of the economy is consistent with the radical decarbonisation that is required across all sectors of the UK economy to meet the net zero target.</p> <p>GAL must explain why it believes it is acceptable to expand to 80 mppa, which is inconsistent with the Aviation Strategy: Making Best Use of Existing Runways (2018). It is not acceptable to simply assume later Jet Zero reductions can be achieved within climate limits.</p> <p>GAL's submission should include all of the greenhouse gas impacts of flying (e.g. including non-carbon aspects such as contrails that are currently omitted) and the overall impact of airport expansion on the climate (including inbound international flights which will increase carbon emissions overseas). It is disingenuous to treat these as zero, or assume that all Jet Zero assumptions can be achieved, without any evidence: both are in breach of the Precautionary Principle and IEMA guidance.</p> <p>The carbon emissions from additional surface transport journeys are not insignificant, and must be assessed separately against both national road sector targets and policies and Surrey and Sussex transport plans and climate strategies.</p> <p>GAL's plans to reduce embodied carbon from construction should be clearly set out, beyond the Climate Action Plan (CAP)'s high-level target currently included. The CAP should be expanded to include full surface access and flight emissions. GAL must set binding limits to constrain and reduce all these GHG emissions.</p> <p>In conclusion, this plan to significantly expand Gatwick Airport, its flights, and its surface transport, will significantly increase greenhouse gas emissions. This will have a significant, negative, impact on the ability of the UK government to</p>	<p>These matters were considered at the Stansted inquiry in 2021 where the Inspectors concluded:</p> <p><i>“98, in this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the proposed development, particularly bearing in mind the government's established policy objective of making the best use of MBU Airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity – changing development, including at MBU airports, which seems far removed from the government's intention.”</i></p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>The Government has set out its continuing approach to policy development in relation to non-CO2 GHG, both in the Jet Zero Strategy and most recently in Jet Zero One Year On (which confirms at page 33 that the Government is committing to further researching the effect of non-CO2 impacts in order to develop any necessary policy response).</p> <p>The exclusion of inbound flights from the assessment is wholly consistent with the assessment framework which is contextualising against a) the UK's carbon budgets and b) the Jet Zero Strategy.</p> <p>It is noted that various stakeholders have their own commitments and reductions trajectories however the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in ES Paragraph 16.10.4 of ES Chapter 16: Greenhouse Gases [APP-041] that references the IEMA Guidance noting that <i>“The inappropriateness</i></p>

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	<p>deliver its Net Zero strategy, stay within its legally binding carbon bindings and meet its international climate commitments.</p> <p>GACC highlight the points made in ISH4 about the need to consider the worst case scenario in the Environment Assessment, which would mean comparing the with-project case (2047) with the current (2019) baseline, as opposed to the future baseline presented by the applicant. For climate change, this means the full impact from the current situation to future project impact should be considered for carbon emissions associated with the project. GACC take the position that this should be extended to include aircraft emissions as well as construction, on-site operations and surface transport emissions, as stated separately</p>	<p><i>of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that ‘effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other’.</i></p>
Air Quality	<p>GACC have a number of serious concerns regarding the air quality chapter, assessing the impacts of the airport development over future years. This is specifically regarding the modelling calculations and assumptions it is reliant upon. As a result of this crude, largely desktop-based modelling, GAL is only, at best, able to infer that the airport's growth has limited adverse impact because of the positive measures of government and local councils towards improving air quality levels, to minimise health impacts of air pollution. As such the development undermines the achievements that have been made and will continue to undermine future achievements.</p> <p>2. By way of context, air quality modelling is used to predict air quality (air pollution) levels at various geographic locations. National and international guidelines to protect people and habitats from air pollution focus on key pollutants (nitrogen dioxide (NO₂), and particulate matter (PM) in particular, though other pollutants can be significant depending on the source of the pollutant emissions). Pollutants are emitted from various pollution sources (e.g. cars, chimneys, aircraft, waste sites, construction sites). The pollutants diffuse, disperse, react and settle, according to the prevailing weather conditions and combine with background pollutant levels. The resulting air quality at a given location can be measured by various monitoring devices; ranging in cost, complexity and accuracy; and based near roadsides or in urban or rural locations.</p> <p>3. Air quality modelling usually calculates two-dimensional contours of air quality levels over a specified geographical area: e.g. a part of a town or an area surrounding a planned development that is expected to be affected by the pollutant emissions arising from that development and the levels at various</p>	<p>The Applicant has responded thematically to air quality concerns at Section 4.3 of its Relevant Representations Report [REP1-048]. Section 4.3 addresses concerns that air quality will worsen as a result of NRP, concerns on modelling of future years and concerns regarding monitoring and mitigation.</p> <p>The Applicant addresses the topic of averaging times impacts at Section 3.24 of its Relevant Representations Report [REP1-048].</p> <p>The Applicant has responded to concerns regarding the confidence of modelling for future years, model verification and the future baseline at Section 3.36 of its Relevant Representations Report [REP1-048].</p> <p>In order to manage future emissions, measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. This includes the commitment to produce future emission inventories.</p>

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	<p>locations can be identified. Calculations are made of air pollutant values averaged over different periods of time: e.g. over minutes, hours or a year, according to the predicted health impacts of the pollutants being considered, describing the short-term and longer-term effects of these pollutants on health and habitats. Air quality modelling relies on: a) historic weather data; b) baseline and future pollutant emissions assumptions (based on the predicted emissions sources); c) baseline measured background air quality levels. All of these have their own inherent uncertainties. Weather data is itself a snapshot of averaged, spot measurements, and the future year weather is not known with any certainty. Emissions inventories are also dependent upon assumptions with regards to road traffic levels, industrial emissions sources and airport related emission sources. Background air quality (i.e. the level measured at schools, at hospitals and in people's gardens) is often based on very crude monthly-averaged measurement devices (e.g. diffusion tubes for NO₂) or roadside emissions monitors, which are very limited in number. Together all of these uncertainties are combined within the crudeness of the available air quality models, which ideally should only be used to compare different development scenarios rather than be relied upon to calculate absolute air quality levels with any accuracy (since they are using so many assumptions in their input data).</p> <p>The confidence in the modelled air quality levels for future years is severely undermined by substantial inaccuracies in all of the aforementioned items. In particular the values for the baseline-modelled year (2018, especially for NO₂) are crudely adjusted to force a fit to the monitored air quality data. For this reason GACC propose that the model is made available for public scrutiny and that an independent statistical review is carried out to validate the assumptions and adjustments to better align the model data to the monitoring data and to review the quality of the monitoring data that is being used.</p> <p>In our view, the modelling must not be relied upon to demonstrate that the future project impacts are not significant.</p> <p>To make this data more robust, GAL should be required to annually review the accuracy of modelled data throughout the development stages, ensuring appropriate mitigation measures are in place should significant impacts be found. This should include reviews on the robustness of pollutant emissions inventories, with revisions of the air quality modelling to reassess and redefine the air quality impacts of the project at each stage to ensure no significant</p>	

Topic	Matter Raised	Applicant's Response
	<p>impacts are missed and not mitigated in a development of this scale. Furthermore, GAL should commit to substantially increasing the level of monitoring (covering the key pollutants of concern, particularly at sites vulnerable to project impacts e.g. schools, hospitals and homes likely to be impacted by an increase in road traffic or other airport-related emission levels) to ensure better quality baseline levels for future years upon which the project impacts are superimposed.</p> <p>In addition, a true future baseline should be provided that is independent of any increase in passenger numbers at Gatwick.</p>	
<p>Water Environment: Water Supply, Waste Water and Flood Risk Assessment</p>	<p>This representation considers the impact on water supply, wastewater management and flooding, and the River Mole water environment: including river habitat, water quality and access for recreation/health and wellbeing.</p> <p>GACC request that the evidence supporting SESW's assertion that they can meet the additional demands for the project should be shared for public examination and the proposed assessment of impact by SESW should be completed now so that it can inform this examination, and include both cumulative impact of other developments in the same water supply area, and the impacts of climate change. A water supply assessment, such as from SESW should be required to be provided, and presented on in an Open Hearing, as a matter of urgency such that it can inform the examination.</p> <p>A wastewater impact assessment, such as from Thames water, on the operation of Horley and Crawley STWs should be required to be provided, and presented on in an Open Hearing, as a matter of urgency such that it can inform the examination.</p> <p>It is our view that the shorter return period chosen by GAL for the airfield is not acceptable and that a 100-year design life, and the climate change allowances for safety critical infrastructure should be equally applied to highway infrastructure and airfield/runway infrastructure. Choosing to under-model the flood impact by selecting a shorter (40-year) design life for runways should not be judged to be acceptable.</p> <p>The River Mole has been the source of extensive flooding to residential areas between Gatwick and entering the River Thames at Hampton Court. GAL's proposal gives insufficient detail on the potential flooding effects of the project on those residential areas, including the effects of climate change.</p>	<p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project. The Applicant has further explained its position in response to ExA question WE.1.9, Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>Separately to the Project, Gatwick is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore Gatwick does not envisage a scenario when it would develop a new local source of water.</p> <p>Wastewater Impact Assessment</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The</p>

Topic	Matter Raised	Applicant's Response
		<p>mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline, Applicant's Response to ExQ1 (Doc Ref.10.16).</p> <p>Airfield Design Life</p> <p>It is considered that a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. Assessment of climate change allowances over a longer design life is therefore considered disproportionate as the aviation industry has changed considerably during the past 40 years and this rate of change is anticipated to continue. That approach notwithstanding the Project mitigation strategy for fluvial flood risk is designed to ensure no increase in flood risk to other parties up to the 1% (1 in 100) Annual Exceedance Probability (AEP) event plus an allowance of +20%, equivalent to the consideration of a 100-year design life for the airfield. As noted in ES Appendix 11.9.6: Flood Risk Assessment [AS-078] the mitigation strategy is designed to the 1% (1 in 100) AEP event plus 20% climate change.</p> <p>Flood Risk</p> <p>Gatwick and the Environment Agency collaboratively constructed the Upper Mole (UM) model that has been used to determine the fluvial flood risk baseline and the potential impacts of the Project. The model extends approximately 1.5km downstream of the Project boundary which is considered sufficient to fully assess any potential effects. The Environment Agency reviewed and accepted the updated baseline model that has informed ES Appendix 11.9.6: Flood Risk Assessment [AS-078] in August 2023. The modelling reported in the FRA demonstrates the Project would not increase existing flood risk or peak water levels on the River Mole for its lifetime, taking the predicted impacts of climate change into account.</p>

Topic	Matter Raised	Applicant's Response
Noise and Night Flights	<p>GACC believes that GAL has failed to apply government aircraft noise policy properly in several key respects and that its proposals therefore require significant revision.</p> <p>GAL's choice of the level at which significant adverse effects are experienced by people is not consistent with government policy. The 57dB Laeq 16 hour contour should be regarded as the level from which significant adverse effects occur and accordingly, in accordance with the Airports National Policy Statement (ANPS), development Consent should not be granted unless effects above that level have been avoided.</p> <p>GAL has applied the government's Lowest Observed Adverse Effects Level (LOAEL) metrics improperly. As a result, it has materially understated the effects of aircraft noise. It should be required to report and cost noise impacts using the limits strongly recommended by the World Health Organisation. In addition, the CAA should be asked to advise whether the ongoing Aircraft Noise Attitudes Survey suggests any change in attitudes to aircraft noise.</p> <p>GAL should be required to engage properly, under independent chairmanship, to develop new noise envelope proposals. To comply with policy, if development consent was granted, the noise envelope should ensure that noise reduces as capacity grows, at a pace that achieves a genuine sharing of the benefits of growth between industry and communities. In addition, the noise envelope should cover all periods of the year and reflect a best-case fleet transition that incentivises airlines to introduce quieter Aircraft quickly. The noise envelope should be based on a suite of metrics and limits to be agreed with all stakeholders, not a single average noise metric. New noise envelope review, compliance and breach arrangements should be developed and agreed.</p> <p>In compliance with the Airports National Policy Statement (ANPS, 2018) there should be a ban on night flights as a condition to any approval of the DCO</p>	<p>The Applicant has responded directly to GACC's points on noise policy, LOAELs, SOAEL, the noise envelope and consultation at Section 3.36 of the Relevant Representations Report [REP1-048] and at Issue Specific Hearing 5: Aviation Noise.</p>

38 Gatwick Diamond Initiative

38.1.1. Table 38.1 sets out the Applicant's response to the matters raised in the Written Representation from Gatwick Diamond Initiative [\[REP1-175\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 38.1 Response to Written Representation from Gatwick Diamond Initiative

Topic	Matter Raised	Applicant's Response
General	<p>We now write to you again to reiterate our support as Gatwick's planning application, to bring its Northern Runway into routine use, makes its way through the Development Consent Order process.</p> <p>Since 2021, the support from the business community has significantly increased, both in numbers and geography. Today, 52 business groups, representing over 55,000 businesses across this Region & the UK have pledged support for Gatwick's Northern Runway Project.</p> <p>This increase demonstrates the appetite from the UK business community to support Gatwick's future and to recognise the national importance of this application.</p> <p>The South East has worked hard to recover from the impact of the Covid pandemic and navigate the current economic challenges. With the Northern Runway plans delivering new global and regional connections, not to mention more than 14,000 jobs and a significant economic boost of over £1bn per year in the Region, the opportunity to support the nation's economy and increase our resilience is one we are proud to support.</p> <p>We welcome Gatwick's commitment to ensure local people are supported through new jobs, education and skills, as well as giving regional businesses opportunities for inclusion in the airport's supply chains. This will help increase local businesses' investment and create opportunities now for residents, and for future generations.</p> <p>Finally, but no less important, we also welcome the airport's plans in relation to the impact on the environment and note the airport's commitment to a global low carbon future for aviation. This aligns with the wider UK aviation sector's ambitions to achieve net zero aircraft emissions and supports the Government's climate targets.</p>	<p>Noted. The Applicant welcomes Gatwick Diamond Initiative's support for the Project.</p>

39 Gatwick Obviously Not

39.1.1. Table 39.1 sets out the Applicant's response to the matters raised in the Written Representation from Gatwick Obviously Not [\[REP1-179\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 39.1 Response to Written Representation from Gatwick Obviously Not

Topic	Matter Raised	Applicant's Response
Policy	Gatwick has not put forward a policy compliant needs case. The ANPS requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which would be met by the provision of a Northwest Runway at Heathrow. Gatwick has instead assumed that there will be no development at Heathrow.	The Applicant has responded to similar points raised by others in The Applicant's Response to Local Impact Reports (Doc Ref. 10.15) and its response to written representations from CAGNE (Appendix B) and to Heathrow Airport Limited (Appendix C) of this document (Doc Ref. 10.14).
Forecasting and Need	In our view there is not a credible needs case for the proposed development because the airport has substantial surplus passenger and ATM capacity without it. Gatwick's projects that it can handle 67.2m passengers and 326,000 ATMs without the proposed development. It is , therefore currently using less than 79% of its current ATM capacity and only some 61% of current passenger capacity. Our analysis of historic growth rates shows that it took over 24 years, pre-COVID, i.e. from 1995 to 2019, for the airport to grow by the amount of surplus passenger capacity that currently exists and over 20 years for it to grow by the amount of ATM capacity that still exists. Based on historic growth, we estimate that Gatwick will not utilise its existing surplus passenger capacity until the 2050s and its existing ATM capacity until the 2040s. When allowance is made for impacts of the pandemic and increasing climate awareness on air travel, and for future economic or other shocks, it is very likely that there will never be a need for additional capacity at Gatwick. By contrast, Gatwick's air passenger and ATM forecasts are characterised by excessive and unsubstantiated optimism. They assume sustained levels of growth in the period before and after 2029 that are substantially out of line with recent pre-pandemic growth and which Gatwick has not achieved historically.	<p>UK and London aviation demand forecasts highlight the lack of airport capacity in the Southeast today. This will only become more pronounced with demand forecast to increase by nearly 50% in 2050 (UK DfT / Jet Zero forecasts). Airport projections highlight that demand will significantly exceed capacity leading to a loss of connectivity, demand, jobs and economic benefits.</p> <p>Gatwick currently experiences excess demand with airlines already unable to get slots to serve the networks they wish to operate. Gatwick is the only airport able to add capacity in the next decade as other potential schemes are considered unlikely to be delivered in that timescale (e.g. LHR R3) or not able to deliver significant capacity until the late 2030s (e.g. LTN). Gatwick's NR will help serve some of the otherwise unmet demand in the 2030s and beyond.</p>
Socio-Economics	We dispute Gatwick's assessment of the economic and employment benefits of the project. GON believes that the economic benefits are overstated and the economic and environmental downsides are understated. When the relevant scheme costs, benefits, their balance of equity, and the long-term societal risks are taken into account, we believe the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and international wellbeing. Many of the arguments set out here are supported by evidence set out in NEF's recent report titled Losing Altitude: The Economics of Air Transport in Great Britain.	The Applicant has responded to the New Economics Foundation more fully at Appendix D to this document, Response to New Economics Foundation Written Representation (Doc Ref. 10.14). The Applicant has responded thematically to comments made within relevant representations regarding overstatement of economic benefits and understatement of the downsides created by the Project at Section 4.25 of the Relevant Representations Report [REP1-048].
Surface Transport	We are concerned about the effects of the project on local roads and air quality near the airport, on water supply and flooding and on congestion on the rail	The Applicant has responded thematically to comments made within relevant representations regarding traffic and transport, at Section 4.26 of its Relevant Representations Report [REP1-048].

Topic	Matter Raised	Applicant's Response
	<p>and trunk networks which airport traffic uses but which are vital for communities much more widely.</p>	<p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project. The Applicant has further explained its position in response to ExA question WE.1.9, Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>Separately to the Project, Gatwick is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for Gatwick to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore Gatwick does not envisage a scenario when it would develop a new local source of water.</p> <p>Flood Risk</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account.</p>
<p>Greenhouse Gases</p>	<p>In relation to climate change issues:</p> <p>a) The proposed development is incompatible with the Government's objective to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing emissions.</p>	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and</p>

Topic	Matter Raised	Applicant's Response
	<p>b) The proposed development would have a material impact on the Government's ability to meet its carbon reduction targets. It is therefore incompatible with the ANPS and consent should be refused.</p> <p>c) IEMA guidance requires assessments to consider the certainty of mitigation proposals and whether they are realistic and achievable. Neither Gatwick nor the government have carried out any such assessment. It is highly likely that an IEMA assessment would conclude that the Jet Zero assumptions relied upon by GAL are subject to significant uncertainty, not supported by credible evidence, inconsistent with the precautionary principle and beyond the Government's and the applicant's control. Consequently, Gatwick's mitigation assumptions do not comply with IEMA guidance and should be reassessed on a compliant basis.</p> <p>d) The Climate Change Committee's most recent Progress Report characterised the approach of the Jet Zero Strategy as "high risk due to its reliance on nascent technology".</p> <p>e) Gatwick has failed to quantify the non-CO2 effects of the project. These should be modelled, costed and weighed in the planning balance. The CCC states in its sixth carbon budget advice that "non-CO2 effects contribute around two-thirds of the total aviation effective radiative forcing – twice as much as historical CO2 emissions from aviation."</p> <p>f) If development consent is it should be subject to a binding set of annual emissions caps in line – at least – with the Government's proposed CO2 trajectory for aviation.</p>	<p>the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government's target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government's most recent response responded to the Progress Report 2022.</p> <p>The Government responded directly to the 2022 recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> • <i>"197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway.</i> • <i>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure."</i> <p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • <i>"We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. • The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net</i>

Topic	Matter Raised	Applicant's Response
		<p>zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</p> <ul style="list-style-type: none"> • <i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target.</i> <p>The Government has set out its continuing approach to policy development in relation to non-CO2 GHG, both in the Jet Zero Strategy and most recently in Jet Zero One Year On (which confirms at page 33 that the Government is committing to further research the effect of non-CO2 impacts in order to develop any necessary policy response).</p> <p>These matters were considered at the Stansted inquiry in 2021 where the Inspectors concluded:</p> <p><i>“98, in this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the proposed development, particularly bearing in mind the government’s established policy objective of making the best use of MBU Airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity – changing development, including at MBU airports, which seems far removed from the government’s intention.”</i></p>
Noise and Vibration	<p>In relation to noise issues:</p> <ol style="list-style-type: none"> We believe the Applicant has failed to apply government aircraft noise policy properly in several key respects and that its proposals therefore require significant revision. The Applicant’s choice of the level at which significant adverse effects are experienced by people is not consistent with government policy. The 57dB Laeq 16 hour contour should be regarded as the level from which significant adverse effects occur and accordingly, in accordance with the Airports National Policy Statement (ANPS), development consent should not be granted unless effects above that level are avoided. The Applicant’s has applied the government’s Lowest Observed Adverse Effects Level (LOAEL) metrics improperly. As a result, it has materially understated the effects of aircraft noise. It should be required 	<p>The Applicant has responded directly to GON's points on noise policy, LOAELs, SOAEL, the noise envelope and consultation and a night ban at Section 3.36 of the Relevant Representations Report [REP1-048] responding to GACC’s similar comments, and in Written Summary of Oral Submissions from Issue Specific Hearing 5: Aviation Noise [REP1-060].</p>

Topic	Matter Raised	Applicant's Response
	<p>to report and cost noise impacts using the limits strongly recommended by the World Health Organisation. In addition, the CAA should be asked to advise whether the ongoing Aircraft Noise Attitudes Survey suggests any change in attitudes to aircraft noise.</p> <p>d) The Applicant should be required to engage properly, under independent chairmanship, to develop new noise envelope proposals. To comply with policy, if development consent was granted, the noise envelope should ensure that noise reduces as capacity grows, at a pace that achieves a genuine sharing of the benefits of growth between industry and communities. In addition, the noise envelope should cover all periods of the year and reflect a best-case fleet transition that incentivises airlines to introduce quieter aircraft quickly. The noise envelope should be based on a suite of metrics and limits to be agreed with all stakeholders, not a single average noise metric. New noise envelope review, compliance and breach arrangements should be developed and agreed.</p> <p>e) In compliance with the Airports National Policy Statement there should be a ban on night flights as a condition to any approval of the DCO.</p>	
Forecasting: Future Baseline	We are not confident that Gatwick's ATM and passenger volumes baseline is achievable with existing consented infrastructure, i.e. without the proposed development. If baseline conditions are not achievable, the environmental and noise effects of the proposed development will be understated.	GAL has explained its approach to the Future Baseline in a number of documents, most recently in its Technical Note on the Future Baseline [REP1-047] .

40 George Upton

40.1.1. Table 40.1 sets out the Applicant's response to the matters raised in the Written Representation from George Upton [\[REP1-180\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 40.1 Response to Written Representation from George Upton

Topic	Matter Raised	Applicant's Response
Greenhouse Gases: Environmental Impact	I strongly object to this application on the grounds of climate change affected by more pollution	The Applicant has responded thematically to comments made within relevant representations regarding greenhouse gases, at Section 4.16 of its Relevant Representations Report [REP1-048] .
Surface Transport	More congestion.	The Applicant has responded thematically to comments made within relevant representations regarding traffic and transport, at Section 4.26 of its Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
Noise	More noise.	The Applicant has responded thematically to comments made within relevant representations regarding noise, at Section 4.22 of its Relevant Representations Report [REP1-048].
Local Road Disruption	More local disruption. The only road improvements will be directly around the perimeter. All other roads will have increased damage and congestion.	The Applicant has responded thematically to comments made within relevant representations regarding traffic and transport, at Section 4.26 of its Relevant Representations Report [REP1-048].

41 Gillian Perry

41.1.1. Table 41.1 sets out the Applicant's response to the matters raised in the Written Representation from Gillian Perry [REP1-184]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 41.1 Response to Written Representation from Gillian Perry

Topic	Matter Raised	Applicant's Response
Surface Transport: Baseline data for transport modelling	One of them is about the methods of assessing increased surface transport options and the plans that have been put before the enquiry. How did Gatwick arrive at this surface transport plan? Are the dates picked for baseline data the right ones?	Section 12.4 ('Methodology for Baseline Studies') of the ES Chapter 12: Traffic and Transport [AS-076] explains the baseline data and further information is provided in Section 6 of the Transport Assessment [AS-079] and in Section 4 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]. The assumptions related to the Project and proposed transport interventions are set out in Section 7 of APP-260 and Section 7 of AS-079. Note that further modelling has been undertaken to account for post-Covid in transport modelling at the request of the Examining Authority which is reported in Accounting for Covid-19 in Transport Modelling [AS-121 and AS-122].
Surface Transport: Rail	I understand that the recent railway station developments that have taken place at Gatwick are to meet current demand up to 2036 and were not designed to cope with further airport expansion. However, the tunnels and bridges cannot be made bigger to cope with more tracks so the capacity cannot be increased for the planned additional passengers up to 80,000,000 pa. This suggests that rail transport options cannot be made adequate and they should have been a key component.	A comprehensive assessment has been undertaken for rail capacity as part of the strategic transport modelling work and this is set out in Chapter 9 of the Transport Assessment [AS-079] and Section 12.9 of ES Chapter 12: Traffic and Transport [AS-076]. The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but the greatest additional demands arising from the Project would occur in the counter-peak direction or off-peak periods, when trains are less busy. No significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users. Mitigation is not therefore required.
Surface Transport: Rail	the enquiry heard that the baseline for data on expected increased passenger numbers was 2019 (46.6 million) but in fact most current data for 2023 shows only 40.9 million passenger journeys. Demand therefore will increase doubly from now to 80 million if the runway is built. Already the railway carriages are	The Applicant has responded thematically to comments made within relevant representations regarding rail impact at Section 4.26 of the Relevant Representations Report [REP1-048].

Topic	Matter Raised	Applicant's Response
	full to capacity from Gatwick to London (I use them regularly) and the facilities for storing luggage on the Thameslink trains are wholly inadequate. Can the figures for rail passengers be reconsidered and the possibilities for public transport to the airport given more priority?	On the passenger growth, this query was raised by the Examining Authority at Issue Specific Hearing 4 and responded to by the Applicant at Deadline 1 in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065]
Surface Transport: Road transport	driving to the airport is a more polluting method of getting there and is likely to use up more land (loss of biodiversity) in creating extra car parks. Whilst it is understood that parking is a good way to collect revenue for the airport, it would be better for the area to reduce road traffic movements by encouraging better bus, coach and rail options than are presently being suggested.	The Applicant has responded thematically to comments made within relevant representations regarding Traffic and Transport, at Section 4.26 of the Relevant Representations Report [REP1-048] .
Greenhouse Gases: Baseline for EIA	The environmental impact of all methods of getting to the airport should be better reflected in the proposals. Rather than picking an arbitrary baseline, the expansion impacts should be compared with NO expansion, especially against a backdrop of measures like air quality in the UK generally being likely to improve over the next 30 years, whereas the air quality at Gatwick is likely to worsen. Heathrow is already the largest single emitter of greenhouse gas in the UK, and I would question why we need a second emitter of huge proportion	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The increase in emissions from a range of GHG sources arising from the proposed Development has been quantified and assessed within the ES. That GHG emissions will increase compared to the Do-Minimum scenario is not disputed.</p> <p>The CAP focuses on three key airport emission sources: airport buildings and ground operations, aviation and construction. Under each heading the CAP sets clear outcomes that GAL is committing to deliver. To achieve those outcomes, GAL will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve.</p> <p>The IEMA guidance does not direct that emissions cannot increase from a project, but that the conclusion drawn on significance of these must draw not only on the scale of emissions, but also the mitigation adopted to (where possible) reduce these, and also whether sufficient action is being undertaken to achieve a rate of reduction that complies with up-to-date policy.</p>
Mitigation	Can Gatwick have control over any negative impacts on air quality, noise from night flights and air quality in future? Or be required to respond to worsening of environmental impacts by changing operational methods (properly banning night flights for example)	The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.

Topic	Matter Raised	Applicant's Response
Surface Transport: Impacts of surface transport proposals	From what I understand, more time is needed for a thorough and fully worked assessment of all aspects of environment impact, and this should lead to a reprioritisation in the planning of how passengers get to and from Gatwick in future. Current plans for surface transport will not adequately protect the air, biodiversity or health of the population locally	The assessment presented with the Application is comprehensive and accords with the scope set out in the Scoping Opinion from PINS ES Appendix 6.2.2: Scoping Opinion [APP-095]. The Applicant's proposals for transport mode share and transport interventions are set out in ES Appendix 5.4.1: Surface Access Commitments [APP-090].

42 Govia Thameslink Railway (GTR)

42.1.1. Table 42.1 sets out the Applicant's response to the matters raised in the Written Representation from GTR [REP1-185]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 42.1 Response to Written Representation from GTR

Topic	Matter Raised	Applicant's Response
Surface Transport: Transport Assessment	<p>GTR disputes the applicant's statement and conclusion on Page 103 of Transport Assessment "There is generally standing on services in both directions between East Croydon and London Bridge and London Victoria in 2029 and 2032, in the future baseline and with Project scenarios. The travel time for this section of the route is within the 20minute threshold that DfT use as guidance for acceptable standing, as long as the standing capacity is not exceeded." Implying there is no standing from Gatwick Airport and a false conclusion that "The rail crowding assessment indicates that no additional mitigation is required because of the Project."</p> <p>At the hearing the applicant stated "we did use GTR data to validate the model", However, their baseline was 2016 a time when passenger growth was stalled due to reduced capacity into London Bridge that was being rebuilt for the Thameslink project.</p> <p>GTR shared 2013 passenger census with advice to uplift. We also shared the 2019 passenger census when it became available which demonstrated how passenger demand had bounced after the implementation of the Thameslink Programme with Passengers in Excess of Seats (PIXS) extending into the off peak.</p> <p>The GTR consultation response, 1st December 2021, we challenged the applicant's assertion that no additional mitigation was required</p>	<p>The Applicant has responded to concerns about rail crowding in Section 3.41 in its Relevant Representations Report [REP1-048].</p> <p>The assessment which supports the Application is based on the transport model suite which was built and validated in accordance with available data. It was based on data from the period before significant disruption took place at London Bridge during construction of the Thameslink Project. The assessment notes that the greatest additional rail patronage related to the Project would occur in the counter-peak directions in peak periods, or in off-peak periods when trains are less busy. It also demonstrates that services would have residual seating and/or standing capacity following the introduction of the Project and that no mitigation is required.</p> <p>In relation to luggage space, the Applicant has provided a response in Appendix C (Rail Passenger Modelling Clarification Note) of The Applicant's Response to Actions from ISH2-5 [REP2-005].</p> <p>Following comments raised at the Issue Specific Hearing 4, the Applicant is continuing technical discussions with Network Rail and GTR on the points raised. This will inform the Statement of Common Ground (SoCG) with Network Rail and The Applicant will provide further updates to the SoCG in due course.</p> <p>The Applicant has also provided additional information in its response to ExA question TT.1.15 (Doc Ref. 10.16t).</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • demonstrating that morning peak pre-covid there was 4.2% Passengers in excess of Seats (PIXS) departing Gatwick Airport on fast line trains (30-40 minutes therefore unacceptable standing) that became severe standing north of East Croydon 10.9% towards Victoria and 22.5% towards London Bridge. • Concluding that as a minimum the applicant should provide funding to help secure the Brighton Mainline Upgrade Programme (BMUP), especially the Croydon Area Remodelling Scheme (CARS) • Advising to secure world class access to Gatwick Airport the applicant should work with investors to deliver a new railway as proposed to the DfT London and South Coast Corridor Study by GTR 	
Surface Transport: Passenger Crowding	<p>At the hearing GTR stated that demand had bounced back stronger than expected Autumn 2023 Passenger census midweek just 9% below pre pandemic, weekends 13% higher than pre pandemic. This has resulted in 16.3% PIXS morning peak from Gatwick Airport on fast line trains very severe north of East Croydon 20.2% on trains towards Victoria and 49.4% towards London Bridge, with a busy off peak hour typically having 1.6% PIXS departing Gatwick Airport all on Victoria trains increasing to 5.6% north of East Croydon although in the short term this could be eased if the pre-covid level of train service were funded and resourced.</p> <p>The applicant stated, "We have a considerable amount of overall capacity on rail services coming through Gatwick and stopping at Gatwick", but omitted to say that capacity was fully utilised at busiest times peak, off peak and weekend, or that variability of demand results in standing even during hours when the average train loads do not have passengers in excess of seats.</p> <p>For airport passengers with luggage a train is uncomfortable even when not all seats are taken because of the space taken up by luggage.</p> <p>Our table demonstrates the need for more capacity on the railway though Gatwick Airport. These are train loads at East Croydon of fast Gatwick Airport to London trains. OTA is the load arriving East Croydon i.e. load departing Gatwick Airport and OTD is the load departing East Croydon.</p> <p>Red indicates passengers in excess of seats, Orange indicates nearly full, which means some standing as trains do not load evenly and is difficult, stressful and uncomfortable for airport passengers with luggage.</p>	As above.

Topic	Matter Raised	Applicant's Response
	<p>The trains shown as pass in the departure time column are Gatwick Express trains which are the most lightly loaded trains for several reasons including not stopping at key stations like Clapham Junction</p>	
<p>Surface Transport: Track Capacity utilisation</p>	<p>As explained at the hearing, pre-pandemic the railway between Gatwick Airport and Central London was making the maximum robust use all available track capacity peak and off peak, and squeezing any additional trains would inevitably result in small delays causing widespread disruption. The Croydon area handles more trains than any other railway in the UK except the approaches to London Bridge, and East Croydon station handles more trains than the total of Inter City trains between London, the Midlands, North and Scotland to/from Euston, St Pancras and Kings Cross combined.</p> <p>Subject to funding the pre-covid level of train service can operate which is 5 more paths in the busiest peak hour, and 2 more paths off peak paths and increasing 8 car trains to 12 car. However, growth will result in that level of train service being full by the 2030's with passenger journeys peak and off peak becoming more uncomfortable as demand continues to increase.</p> <p>Without additional capacity, to accommodate the additional passengers some people will choose not to travel by train to Gatwick Airport e.g. may choose to travel by taxi, or use another airport.</p> <p>Inevitably if Gatwick Airport funds road network expansion, while the railway remains capacity constrained, there will be modal shift away from rail to road making sustainable travel targets unattainable a trend made even worse as passenger expectations are increasing with people becoming less tolerant of travelling in discomfort.</p>	<p>As above.</p>
<p>Surface Transport: Future Growth</p>	<p>Growth driven by economic activity, population growth and airport growth has resulted in full track utilisation and crowded trains peak and off peak on the Brighton Mainline through Gatwick Airport to London. Although Covid set passenger demand back and has changed the way people work, passenger demand has bounced back faster than expected, and will continue to grow so that even without additional airport capacity, by mid century rail use will be far in excess of what the current Brighton Mainline can accommodate.</p> <p>Even once the train service restored to pre-covid levels, the maximum the infrastructure can accommodate, growth by mid-century is expected to</p> <ul style="list-style-type: none"> • cause discomfort for passengers 	<p>As above.</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • result in people choosing not to travel, or find a different way to travel o with more airport passengers using road to access the airport • suppress economic growth. <p>Requirement to accommodate airport passengers:</p> <p>Increased rail capacity to accommodate additional air passengers.</p> <p>As a minimum, a reasonable proportionate contribution as Network Rail suggests towards increasing rail capacity to accommodate increase of airport passengers</p> <p>Gatwick Airport should not treat this as a cost to get their DCO approved, but consider it an investment to enable their customers to access air travel in reliable comfort.</p> <p>Failure to invest will</p> <ul style="list-style-type: none"> • undermine the viability of airport expansion, • condemn the travelling public to uncomfortable unreliable travelling conditions. • Gatwick Airport should be as visionary about accessing the airport as they are about expansion and improving the airport. • GTR contribution to the London and South Coast Corridor Study • demonstrated that even CARS and BMUP was not sufficient for the long term, • presented a visionary transformation for the BML and access to Gatwick Airport with a very strong business case, • Gatwick Airport 15 minutes from central London every 5 minutes • Gatwick Airport should look at this contribution “New London Gatwick Sussex Railway” and work to make this transformational surface access for Gatwick Airport become a reality. 	

43 Green Party Group of County Councillors, East Sussex County Council

43.1.1. Table 43.1 sets out the Applicant's response to the matters raised in the Written Representation from the Green Party Group of County Councillors, East Sussex County Council [[REP1-188](#)]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [[REP1-048](#)].

Table 43.1 Response to Written Representation from the Green Party Group of County Councillors, East Sussex County Council

Topic	Matter Raised	Applicant's Response
Climate change and Greenhouse Gases	There are no scenarios where an increase in air travel is consistent with the UK climate targets over the next 30 years; and the carbon emissions in the proposal are not calculated correctly or in line with government guidelines.	The Applicant has responded thematically to comments made within relevant representations regarding Climate Change and Greenhouse Gases, at 4.6 and 4.16, respectively, of the Relevant Representations Report [REP1-048].
Modelling assumptions	The baseline air transport figures that impacts are measured from are not the present-day figures, but some projected figures in the future. To see the actual impact from today to the proposed future, the impacts all need to be measured from today.	The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Statement [APP-031]. The Applicant has further explained its position in response to ExA question GEN.1.30, Applicant's Response to ExQ1 (Doc Ref. 10.16).
Surface Transport	The transport solutions for getting to and from the airport are too car focused and not enough effort has been put into incentivising public transport use and incentivising car use.	The Applicant has responded thematically to comments made within relevant representations regarding Traffic and Transport at 4.26 of the Relevant Representations Report [REP1-048]. This covers questions relating to concerns already made that the solutions are too car focused.
Surface Transport	There is not enough attention given to the road issues beyond Gatwick – especially the A22 and the A264, which both run through villages and are major roads for accessing the East Grinstead and Crawley area from East Sussex.	Comprehensive strategic transport modelling has been undertaken as set out in Chapter 9 of the Transport Assessment [AS-079] and Diagram 5.3.3 to [AS-079] shows the Area of Detailed Modelling, which includes the A22 and A264. The potential impact of the Project on these routes has therefore been considered as part of the assessment, which indicates that there would not be significant adverse effects requiring mitigation as a result of the Project. The journey time assessment contained in the Transport Assessment [AS-079] includes routes on the A22 and the A264, as shown in Diagrams 12.5.5 and 12.5.6 of the Transport Assessment [AS-079].
Ecology and general environmental assessments	The ecological, air quality, water quality and other impact on the Ashdown Forest, local rivers, local nature and wildlife, has not been fully considered.	The Applicant has responded thematically to comments made within relevant representations regarding Air Quality, Water Environment, Ecology and Nature Conservation at 4.3, 4.27 and 4.13, respectively, of the Relevant Representations Report [REP1-048].
EIA	The current negative ecological and climate impacts need to be addressed also, and this is not taken into account	The Applicant has responded thematically to comments made within relevant representations regarding Ecology and Nature Conservation, and Greenhouse Gases at 4.13 and 4.16, respectively, of the Relevant Representations Report [REP1-048].
EIA	The application should assess the worst-case scenario for environmental impact of surface transport, noise, air pollution and climate change. The number of passengers is projected to increase from 40.9m in 2023 to 80.2m in 2047, which is an increase of around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental	This query was raised by the Examining Authority at Issue Specific Hearing 4 and responded to by the Applicant at Deadline 1 in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment [APP-

Topic	Matter Raised	Applicant's Response
	<p>impacts of the proposal against a future projected baseline of 67 mppa (in the do nothing scenario) in 2047. So they are calculating an increase of just 13.2 mppa just 1/3 of the actual increase.</p> <p>The Environmental Assessment guidance indicates that the assessment should be made against the realistic worse case. This has not been done. (The Traffic & Transport Chapter of the Environment Statement has been undertaken in accordance with rescinded guidance by IEMA: Guidelines for Environmental Impact Assessment of Road Traffic (1993). This was replaced in July 2023 by Environmental Assessment of Traffic and Movement. Therefore, if there are future updates to the Environmental Statement, this should be reviewed against the latest guidance and amended. As necessary.)</p> <p>The modelling, scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion and growth is seen.</p>	<p>031], and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42 as set out in the response to Ben Bennat at Section 9 of this document. The Applicant has further explained its position in response to ExA question GEN.1.30, Applicant's Response to ExQ1 (Doc Ref. 10.16).</p>
<p>Surface Transport – public transport</p>	<p>More emphasis is needed on an increase in public transport use and incentivising the use of cars. Rail capacity needs to be increased, better bus services locally, with an emphasis on building up bus services in neglected rural areas – A22, Crowborough, Uckfield and Heathfield.</p> <p>Future environmental and local impacts should be no worse than now – especially for land transport considerations.</p> <ul style="list-style-type: none"> • GAL should model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere. • Local traffic congestion and parking impacts in and around Gatwick should not be worse – so modelling on how to achieve that and what it would look like is required. • As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality. This has not been shown. <p>ESCC requires measures that reduce traffic through sensitive locations near and through Ashdown Forest Special Area of Conservation (SAC) / Special Protection Area (SPA) and along the A22. There is a concern about the project's impacts on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, SAC, and a Site of</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding Traffic and Transport at 4.26 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	Special Scientific Interest (SSSI). As a consequence, there is a need for GAL to consider these impacts in respect of air quality and nitrogen deposition issues as part of their modelling work.	
General	<p>The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated. In particular the proposal should commit to:</p> <ul style="list-style-type: none"> • No night flights • Stronger noise limits and mitigation scheme. • Addressing existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. 	<p>Noise</p> <p>Please see the information provided in the Relevant Representations Report [REP1-048] Table 4.22.1 in response to the generic comment <i>Concern about the current impact of noise from the airport, including night flights.</i></p> <p>The Project includes a series of noise mitigation measures including an enhanced noise insulation scheme that addresses all areas affected by aircraft noise in the future case with the Project regardless whether the project itself would increase those noise levels and as such addresses the total noise effect the airport not only that of the Project.</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p>

Topic	Matter Raised	Applicant's Response
		<p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through</p>

Topic	Matter Raised	Applicant's Response
		<p>the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example, the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p>
<p>Section 106 commitments</p>	<p>Gatwick must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts – as part of a new Section 106 agreement regardless of whether the airport is expanded or not.</p> <p>This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.</p> <p>GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport.</p>	<p>ES Appendix 5.2.3: The Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.</p> <p>The DCO s106 Agreement will only apply to the airport in the event that the DCO is granted and then implemented. The Applicant is in discussions with Crawley Borough Council and West Sussex County Council about a new s106 Agreement that would apply to the airport following the expiration of the 2022 Agreement and prior to the DCO s106 Agreement taking effect.</p> <p>Strategic modelling has been undertaken for the region, as shown in Diagram 5.3.3 of the Transport Assessment [AS-079] which includes the routes approaching the A23/M23 corridor, including the A22, A264 and the southern section of the M25. Based on the modelling assessments, with the proposed highway improvement works in place the Project is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation additional to the highway works already proposed.</p>
<p>Climate Change and Greenhouse Gases</p>	<p>Climate change is a significant impact and should be addressed.</p> <p>Gatwick must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact.</p> <p>Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.</p> <p>There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. On climate grounds alone the airport's expansion is unjustifiable.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding Greenhouse Gases at 4.16 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
<p>GHG – Well to Tank emissions and embodied carbon.</p>	<p>The environmental statement does not calculate well-to-tank emissions (WtT), which is noncompliant with the globally recognised GHG Protocol Corporate Accounting Standard and goes against the UK Government's carbon accounting methodology (BEIS, 2022). Using WtT emissions methodology would raise GHG emissions associated with aviation by approximately 20.77%.</p> <p>It is not clear if a conversion was undertaken from CO₂ to CO₂e for aviation emissions, which would result in a 0.91% increase in all aviation emissions (BEIS, 2023). This needs to be clarified.</p> <p>Further clarity is required on whether embodied carbon from construction materials has been considered in the assessment.</p>	<p>The assessment does not seek either to develop a Corporate Reporting Account for Gatwick Airport Ltd (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project for a full 120 years study period. The methodology has been developed to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment as required by IEMA.</p> <p>It is not disputed that Well-to-tank emissions arise in the supply chain for fuels, and methodologies for estimating these (as an uplift to direct emissions) are well established. However, the approach adopted is based on the assessment process which contextualises emissions against a) the UK carbon budget and b) the Jet Zero Strategy.</p> <p>The RICS Guidance on Whole Life Carbon assessment currently in force dates from 2017. The revised guidance will come into force in July 2024. In neither of these is the assessment of User emissions (within Module B8) a mandatory item for inclusion. As such the assessment exercise within ES Chapter 16: Greenhouse Gases [APP-041] (as required by ANPS) captures a larger scope of emissions than is mandatorily required by RICS Whole Life Carbon assessment guidance by including surface access emissions from passengers, and by including emissions from aircraft.</p> <p>With regards to Well-to-tank considerations – this requires some care regarding the inclusion of WTT emissions arising from different sources when considered in the context of the assessment contextualisation within a UK framework.</p> <p>The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years – see https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes) and as a result WTT emissions would predominantly fall outside the scope of the UK carbon budgets and the Net Zero legislation. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it was also removed from other aspects of the GHG assessment.</p> <p>However, it is acknowledged that the inclusion of WTT for Construction, ABAGO, and Surface Access would be useful for contextualisation against the UK Carbon</p>

Topic	Matter Raised	Applicant's Response
		<p>Budgets. The WTT emissions for these will be calculated and provided at Deadline 4.</p> <p>It is acknowledged that maintenance and repair of the newly constructed elements within the Project will be required. A full life cycle carbon assessment would seek to quantify this over a defined study period, which would likely extend beyond the 2050 assessment period (which is used based on assessing risk to UK achieving carbon targets). Within the timescales between opening year (2029) and the end of the assessment year (2050) it is considered unlikely that maintenance, repair, replacement, and refurbishment GHG emissions would be so great as to materially change the assessment of operational emissions. The mitigation set out in the Carbon Action Plan, specifically regarding to employing PAS2080 as a Carbon Management System, would necessitate GAL adopting a whole life carbon approach in the management and mitigation of emissions from Modules B2-B5 as part of their wider carbon management approach.</p> <p>Para 16.9.4 of ES Appendix 16.9.4: Assessment of Aviation Greenhouse Gas Emissions [APP-194] confirms that the modelling process estimated fuel consumption from aviation, and this was then converted to estimated tCO₂e using the appropriate conversion factor. All aviation emissions within the ES are reported to reflect tonnes of carbon dioxide equivalent (tCO₂e).</p> <p>Table 5.3.1 in ES Appendix 16.9.1: Assessment of Construction Greenhouse Gas Emissions [APP-191] clearly presents the embodied carbon associated with construction of the Project.</p>
Climate Change and Greenhouse Gases	<p>Use of offsets and off-site renewable generation, including the following three points.</p> <ul style="list-style-type: none"> The environmental statement suggests reliance upon Renewable Energy Guarantees of Origin (REGO) certificates to achieve net zero emissions. REGOs do not guarantee that additional renewable generation will be brought online to match demand. Guidance in the UK Government's Streamlined Energy and Carbon Reporting (SECR) should be followed to accurately report emissions from electricity consumption. The Environmental Statement describes use of carbon offsets. Various risks have been identified by the scientific community around offsetting schemes. GAL should specifically state which offset scheme they intend to use so research can be conducted into the robustness of the scheme. 	<p>The reference to use of Streamlined Energy and Carbon Reporting within the submission ignores the references made to several relevant standards and guidance that have informed the assessment of GHG arising from the Project. Para 3.1.5 of ES Appendix 16.9.2: Assessment of Greenhouse Gas Emissions for Airport Buildings and Operations (ABAGO) [APP-192] clearly sets out the approach taken to incorporating different carbon intensities depending on the source of electricity within the modelled energy consumption.</p> <p>It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following:</p> <p><i>"We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the</i></p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> The Environmental Statement assumes that the Government's Jet Zero Strategy will ensure aircraft emissions remain compatible with the UK's net-zero targets. Recent developments call this assumption into question, most notably advice from the Climate Change Committee in their 6th Budget Report. Further sensitivity analysis should be undertaken, exploring scenarios where uptake of Sustainable Aviation Fuels and electric aviation take place at slower rates or, in the latter case, fail to achieve commercial uptake. 	<p><i>Strategy in 2022. The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."</i></p>
Landscape, Ecology, Noise and Health	<p>Human and animal wellbeing need to be considered more carefully. Clarification is required on how the proposal aligns with dark skies policy Outlined in local protected landscape strategies e.g. High Weald, South Downs National Park. The noise and vibration impacts on health and well-being of local communities and wildlife need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups and species within this, that may be more affected by the impacts of noise (and vibrations). A Health Impact Assessment should outline population health impacts for East Sussex and appropriate mitigations proposed and provided to protect human and animal population health and any impact on local services and infrastructure</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding health and wellbeing, and landscape matters at 4.17 and 4.19 of the Relevant Representations Report [REP1-048]. The Applicant has also responded to the ExA's question on animal wellbeing at LU.1.3 of the Applicant's Response to Written Questions – Land Use and Recreation (Doc Ref. 10.16).</p>

44 Greensand Holdings Limited

44.1.1. Table 44.1 sets out the Applicant's response to the matters raised in the Written Representation from Greensand Holdings Limited [REP1-189]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 44.1 Response to Written Representation from Greensand Holdings Limited

Topic	Matter Raised	Applicant's Response
Socio-Economics: Employment Land	<p>Greensand Holdings Limited, is a wholly owned subsidiary of Reigate and Banstead Council. Any points raised by Greensand Holdings Ltd are also the views of the Council. Policy HOR9 of the Reigate and Banstead Local Plan Development Management plan (adopted in September 2019), is allocated for a strategic business park to provide up to 200,000 sqm of B1 floorspace and 10,500 sqm for community facilities. The Council via Greensand Holdings Limited owns 8.82ha of the allocated land (28%), 19.9 ha of the land (64%) is</p>	N/A

Topic	Matter Raised	Applicant's Response
	<p>owned by Surrey County Council and the remainder, 2.5 ha (8%), is owned by Threadneedle, which has recently acquired its interest. A plan showing the allocation is attached. This recent acquisition by Threadneedle illustrates the potential interest from large investors in the employment opportunity on the allocated land.</p> <p>The principal access to the proposed business park will be via a new Spur Road to the M23, giving direct access to the strategic road network and direct connectivity to the regional transport network. There is no alternative access to the site which provides this.</p>	
Socio-Economics: Impact on Local Economy	<p>The proposal to use the access land to the site as a works compound will effectively prevent the promotion, sale and development of the land for a strategic business park for a very considerable period. This will have a detrimental impact on the local economy by significantly delaying the development of this important piece of economic infrastructure. It is also considered unreasonable that Gatwick Airport Ltd delay the development of the business park whilst bringing forward competing new hotel and office space on land it already owns.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding local economic growth, at Section 4.25 of its Relevant Representations Report [REP1-048].</p> <p>The Applicant makes reference to Horley Strategic Business Park within Table 17.11.1 of Cumulative Effects Assessment within ES Chapter 17: Socio-Economic [APP-042] and at para 17.11.16. The completion assumption for the business park is 2040 and therefore is beyond the Project period assessed within the Environmental Statement. This assumption is based upon the lack of agreed masterplan (as required by policy) or planning application for the business park; this means there is no detailed basis upon which to assess the timing or degree of any potential disruption effects, or certainty regarding delivery of the site.</p> <p>The Applicant met with SCC and their appointed agents on the 1st February 2024 to review and discuss concerns including disruptions and potential means for mitigation in Bayhorne Farm where the Horley Strategic Business Park is located. The Applicant awaits technical data from SCC to support proposed mitigation strategies. Without this data, a substantial response cannot be provided or substantive progress made. Engagements and negotiations continue with SCC.</p>
Surface Transport	<p>It will be unacceptable on safety grounds to have the construction traffic of the airport and the business park both using the M23 spur. It will also be unacceptable for developers, investors and occupiers of the offices to be sharing this space with the airport construction traffic.</p>	<p>The M23 Spur is part of the strategic highway network and is public highway. Construction traffic will be managed by a Construction Traffic Management Plan, as anticipated in ES Appendix 5.3.2: Code of Construction Practice Annex 2 [APP-085]. The modelling for the assessment has been carried out in accordance with methodology set out in the DfT's Transport Appraisal Guidance, which takes account of other developments based on the degree of certainty that they will come forward within the timescales being modelled. The Applicant anticipates that the promoter of the business park would need to demonstrate the acceptability of its</p>

Topic	Matter Raised	Applicant's Response
		impacts on the highway network at the time that a planning application comes forward.
Compulsory Acquisition	There has been no pre-application consultation with Greensand in respect of the use of the land as a works compound.	<p>The Applicant consulted with Greensand Holdings Limited via their appointed agent and had an initial meeting on the 12th December 2022. This consultation was based on the inclusion of land owned by Greensand Holdings Limited within the Order Limits at that time. Prior to DCO submission the Order Limits were revised, and Greensand Holdings land was removed. Greensand Holdings Limited, as an affected party have remained as consultees and have received all relevant consultation. No requests for further meetings or questions have been raised to the Applicant or their appointed agents since December 2022.</p> <p>The Applicant confirms that Greensand Holdings Limited is listed in the scheme as a Category 3 interest.</p>
Compulsory Acquisition	It is considered that the Compulsory Purchase Code will not provide sufficient compensation for the loss and harm to Greensand Holdings Limited and the local economy caused by the delay in the provision of the business park by the use of parcel 4/468 as a works compound. Greensand Holdings Limited, therefore, requests that the DCO is modified to remove parcel 4/468.	<p>The Applicant confirm that Greensand Holdings Limited do not own land within the Order Limits, but is listed in the scheme as a Category 3 interest.</p> <p>The Applicant will be obligated to meet all justified and mitigated claims arising out of the scheme, in accordance with the relevant legislation, including the Compensation Code.</p> <p>The Applicant is in discussions with Surrey County Council who own the land at parcel 4/468, these discussions are documented at Row 2.7.1.21 of the Statement of Common Ground between Gatwick Airport Limited and Surrey County Council [REP1-045] and in the Land Rights Tracker [PDLA-010].</p>

45 Growing Gatwick Lobby Group

45.1.1. Table 45.1 sets out the Applicant's response to the matters raised in the Written Representation from Growing Gatwick Lobby Group [\[REP1-190\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 45.1 Response to Written Representation from Growing Gatwick Lobby Group

Topic	Matter Raised	Applicant's Response
Socio-Economics, local infrastructure, needs case	Many of those who are involved in the group were directly & negatively affected by recent downturns at the Airport, not least during Covid. The recovery that we have seen in the local economy has been greatly helped by the recovery in aviation & at Gatwick.	Support for the application is noted and welcomed.

Topic	Matter Raised	Applicant's Response
	<p>The primary reasons for support expressed by followers of the Group include:</p> <ul style="list-style-type: none"> • Economic growth for the region & the country. • Direct & indirect employment opportunities for residents in the area. • New routes to new destinations & greater frequencies to existing destinations for leisure & business travel, including domestic destinations where rail isn't an option (such as Jersey!). This will bring greater competition & so be of benefit to consumers. • Inbound tourism to the local area along with inward investment bringing opportunities for employment & business growth in other industries. • Increased infrastructure & transport investment which will benefit both businesses & residents. • Operational resilience for the London Airport network. • Matching increasing demand for air travel (especially as we hear rumours that Heathrow may delay the planned capacity increase from their proposed 3rd runway) <p>There are concerns expressed about the impact of the increase in flights & passenger numbers, but these are being addressed by investment in the local road network. We have also seen Gatwick invest around £40m (c20%) in the rail station to support increased use of public transport along with subsidies to buses operating 24/7 to provide direct public transport into the Airport. Just yesterday we read that the airside vehicle fleet will be powered by HVO.</p> <p>In terms of the environment, aviation is constantly evolving & many of the contributors to the Group comment on the difference in noise from the BAC 1-11 & DC10 aircraft operating in the 1980s compared with the very modern aircraft we see in operation today. As one commentator posted, Airlines don't burn fuel for fun. The industry is highly motivated to minimise fuel burn as well as explore alternative & more green fuels such as SAF &, eventually, Hydrogen.</p>	

46 Heathrow Airport Limited

46.1.1. The Applicant's response to the Written Representation from Heathrow [REP1-192] is enclosed at **Appendix C**.

47 Herbert John Doree

47.1.1. Table 47.1 sets out the Applicant's response to the matters raised in the Written Representation from Herbert John Doree [\[REP1-193\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 47.1 Response to Written Representation from Herbert John Doree

Topic	Matter Raised	Applicant's Response
Needs case, and policy	There is no economic case given reduced demand from the public due to environmental concerns, possible future Government constraints to achieve targets, reduced business flight demand due to internet conferencing and capacity expansion at Heathrow.	The Applicant has responded thematically to comments made within relevant representations regarding the demand forecasting, including in the context of Jet Zero at 4.21.1 of the Relevant Representations Report [REP1-048] .
General: Local Infrastructure	Unacceptable increase in local traffic on country roads around Gatwick, increase in noise, increase in flooding and insufficient sewage treatment plants.	The Applicant has responded thematically to comments made within relevant representations regarding traffic and water infrastructure, at 4.3.1 and 4.13.1 (respectively) of the Relevant Representations Report [REP1-048]
Socio-Economics	Biased financial appraisal to justify expansion whereby Gatwick gets all the benefits of expanded income but does not bear the full costs of the environmental damage Regional airport expansion has been shown to be a better alternative.	The National Economic Impact Assessment [APP-251] has been produced in line with the DfT Transport Appraisal Guidance in an unbiased manner.

48 Historic England

48.1.1. Table 48.1 sets out the Applicant's response to the matters raised in the Written Representation from Historic England [\[REP1-072\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#) and **Statement of Common Ground between Gatwick Airport Limited and Historic England** [\[REP1-035\]](#).

Table 48.1 Response to Written Representation from Historic England

Topic	Matter Raised	Applicant's Response
Heritage	We support the thoughtful approach taken to undesignated heritage assets to include unlisted but significant historic buildings, areas of enhanced archaeological potential and the possibility of not currently known about remains. Based on the work to date (much of which is detailed in the PEIR, Chapter 7: Historic Environment) to characterise the archaeological potential of the land	Both of these matters have been agreed with Historic England, please see Rows 2.13.2.1 and 2.13.4.1 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035] .

Topic	Matter Raised	Applicant's Response
	<p>affected, we consider it likely that the harm to undesignated archaeological assets could to a large extent be mitigated by the public benefits of an enhanced understanding that could be derived from the opportunity to undertake a detailed archaeological study of this part of the Wealden landscape. Others will lead for advice about this aspect, notably the West Sussex County Council archaeological adviser, but we remain ready to contribute to formulation of a research agenda and to offer strategic advice about its implementation. This could include how best the effects of airport development can be understood through further studies to inform ongoing discussion of mitigation. We note the potential for impacts to the setting of a number of designated heritage assets as a result of changes in the noise profile and disturbance from expanded airport operations.</p>	
Heritage	<p>One scheduled monument (Thunderfield Castle medieval moated site, NHLE 1013348) to the east of the airport may be affected by the proposals to improve access roads. We are content, however, that there will be no significant change to the setting of the monument arising from the scheme and that, unless there is a substantial change to the proposals in the vicinity of the monument, this matter does not require further assessment.</p>	<p>This matter has been agreed with Historic England, please see Row 2.13.3.4 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035].</p>
Heritage	<p>It would appear from the plans before us currently that no listed buildings would be lost (i.e. through demolition) but that the Grade II* former Charlwood Park Farmhouse, Horley Road (NHLE 1187090) and a number of grade II listed buildings would be subject to direct or indirect impacts that may compromise their significance through changes in their settings. In the context of the NPPF policies above, any harm will require clear and convincing justification. Through LTVIA analysis and additional views assessment it has been possible to demonstrate that the immediate setting of the listed Farmhouse will not be significantly affected by the proposals in the context of its existing compromised situation within the airport operational area. There may be some minor visual intrusion by some new airport structures (e.g. the CARE facility emissions stack), but these are minimal in their impact as proposed and may be removed from the final submission scheme. We have no concerns about effects on this heritage asset.</p>	<p>This matter has been agreed with Historic England, please see Row 2.13.3.5 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035].</p>
Heritage	<p>There is the possibility of direct or indirect impacts to a small number of grade II listed buildings on the periphery of the airport estate. These are identified and assessed in the ES Chapter 7: Historic Environment report; we have no comment to make on these assessments in detail and broadly agree with the outputs from the assessments. Where impacts to heritage assets are identified,</p>	<p>This matter has been agreed with Historic England, please see Row 2.13.3.6 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035].</p>

Topic	Matter Raised	Applicant's Response
	possible mitigations are noted, and we would expect that these are secured through the consenting process.	
Heritage	The highway changes at Longridge Roundabout and the proposed widening of the A23 bridge over the River Mole, are unlikely to result in significant harm to the setting of the Church Road, Horley Conservation Area. The impacts that have been identified from the road works, and as a result of new built structures within the airport proposals intruding in views from the conservation area, are likely to be mitigated by the scheme design and enhanced planting acting as a screening. There is also the prospect of an enhancement to the character and appearance of the conservation area arising from increased public access to Church Field via the new footbridge, and the potential for better heritage interpretation presentation relating to the historic core of Horley village and to the adjacent undesignated Medieval moated site. These mitigations and benefits should be secured in the consent for the scheme via appropriate mechanisms (such as, scheme design or planning obligations).	This matter has been agreed with Historic England, please see Row 2.13.4.2 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035] .
Heritage	We note that the issue of air noise and its effect on tranquillity form part of the way in which the setting of designated assets are experienced. We acknowledge the work done through the noise assessments (in particular the use of the Temple methodology, originally commissioned by English Heritage (now Historic England)) as specified in the Appendix 7.6.1: Historic Environment Baseline Report and summarised in the updated ES	This matter has been agreed with Historic England, please see Row 2.13.4.3 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035] .
Heritage	The three most affected noise-sensitive heritage assets - viz. the Grade II listed Church of St John the Baptist, Capel (NHLE 1378150); the Grade II listed Quaker Meeting House with attached cottage at Capel (NHLE 1028737); and the relocated Grade II listed Lowfield Heath Windmill, Charlwood (NHLE 1298883) - would not experience a worsened aircraft noise impact based upon this assessment. This would be the case also in regard to the Grade II* listed Church of St Michael and All Angels at Lowfield Heath (NHLE 1187081). On the basis of this assessment we are content that no permanent significant harmful impacts to high-graded designated heritage assets from increased aircraft noise would result for the scheme proposals.	This matter has been agreed with Historic England, please see Row 2.13.3.7 of the signed Statement of Common Ground between Gatwick Airport Limited and Historic England [REP1-035] .

49 Holiday Extras Ltd

49.1.1. Table 49.1 sets out the Applicant's response to the matters raised in the Written Representation from Holiday Extras Ltd [\[REP1-195\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 49.1 Response to Written Representation from Holiday Extras Ltd

Topic	Matter Raised	Applicant's Response
Surface Transport	<p>“Kiss-and-fly” is one of the least sustainable means of access to London Gatwick Airport. It is a topic which has received little research, but where it has been studied, the results have shown that far greater benefits were likely to accrue to the environment, congestion and safety if the double journeys generated by “kiss-and-fly” could be reduced, than could otherwise be made from small modal shifts to public transport usage, however desirable that may be.</p> <p>There has been no consideration by the Applicant of the increasing significance to be attached to Transportation Network Companies (TNCs) such as Uber, which offer advantages to their drivers as well as passengers and which it is contended airports must consider in term of the impact on pricing as a management tool.</p>	<p>Kiss and Fly trips are considered as part of the mode share so reductions in Kiss and Fly activity and/or increases in public transport use that would arise from the Project are accounted for in the assessment and in the forecast mode shares. Further detail on the modelling of mode shares is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260].</p> <p>Uber forms part of the taxi offer - the assessment includes consideration of taxi trips and treats all such trips without distinction between providers. When determining future parking and forecourt charges, the Applicant will consider the potential effects on taxi use as part of wider considerations about mode share and progress towards achieving the commitments set out in ES Appendix 5.4.1: Surface Access Commitments [APP-090].</p>
Surface Transport	<p>The Applicant in their DCO application has not considered the consequences of a reform to the airport slot allocation system, including what that may mean in terms of the introduction of new airlines, increases in connectivity, improved feeder services and hence attractiveness for all categories of passengers using London Gatwick Airport.</p>	<p>The Transport Assessment [AS-079] is based on the forecast passenger growth set out in ES Appendix 4.3.1: Forecast Data Book [APP-075], which takes account of known or expected changes in air services and passenger categories. This provides a reasonable worst case for the assessment. Section 7.4 of Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] sets out how the airport demand growth has been derived for the traffic modelling.</p>
	<p>The following conclusions arise from recent applications relating to the requirement for dedicated car parking spaces to serve existing on-airport hotel accommodation. The same considerations are equally applicable when considering future on-airport hotel accommodation in cases where an absence of any dedicated car parking spaces is to be provided.</p> <p>A. Firstly, there have been recent cases in which on-airport hotel applications have provided no dedicated car parking spaces, or where car parking spaces previously provided as part of a staff car park, have been lost. The justification for not providing dedicated hotel car parking is contradictory, in that on the one hand it is stated that it will encourage hotel guests to use more sustainable modes of access to the airport; and on the other, it is stated that hotel guests will simply have access to existing on-airport passenger car parks. In other cases, dedicated car parking spaces to service the needs of a hotel have been provided, ostensibly on the basis that it would release existing on-airport car parking spaces for passengers, reduce “kiss-and-fly” trips, and/or remove the need for trips to off-airport car parks. It therefore can be seen that there is a</p>	<p>It should be noted that different airports have different surface access characteristics and they are not directly comparable. In response to the points in turn:</p> <p>A - The forecast of parking capacity required takes account of existing patterns of use in on-airport hotel parking, where it exists. On-airport hotel parking which is not operated by the Applicant is considered to be part of the 'off-airport authorised passenger parking' total in the calculation set out in the Car Parking Strategy [REP1-051]</p> <p>B - The number of passengers staying at hotels, as a proportion of the total car parking capacity available to passengers, is very small. Parking charges for using on-airport long stay passenger car parks would apply to hotel guests, as they do to other passengers. The number of hotel guests who choose to park in on-airport passenger car parks will therefore not have a significant effect on the overall occupancy or operation of those car parks.</p>

Topic	Matter Raised	Applicant's Response
	<p>lack of consistency when contemplating dedicated car parking spaces to meet on-airport hotel provision.</p> <p>B. Secondly, in circumstances where there is an absence of dedicated car parking for both existing and future on-airport hotel developments will mean passengers having to use existing on-airport passenger car parks, resulting in increased pressure being placed on available on-airport car parking provision for passengers. No studies have been undertaken by the Applicant which consider the impact of using on-airport passenger car parking spaces to meet the needs of on-airport hotels.</p> <p>C. Thirdly, the absence of dedicated car parking provision associated with both existing and future on-airport hotel developments has the propensity to encourage the least sustainable modes of access to the airport, namely “drop-off” and “kiss-and-fly”. There have been no studies carried out by the Applicant of the relationship between future on-airport hotel car parking supply, and “drop-off” and “kiss-and-fly” modes.</p> <p>D. Fourthly, the absence of any dedicated on-airport car parking spaces for existing as well as future on-airport hotel accommodation has the propensity for passengers to use either long term off-airport car parking., if only because it is less expensive than on-airport car parking, or alternatively, rely on fly parking in surrounding residential streets. This issue has not been assessed as part of the DCO application.</p>	<p>C - A number of hotels provide shuttle bus services to and from the terminals, or are within walking distance of the terminals, which avoids the need for passengers to use taxis to travel between the hotel and the terminal and thus limits the number of kiss and fly trips made between hotels and terminals.</p> <p>D - Bearing in mind the response to point B above, the likelihood of hotel guests using off-airport long-term passenger parking, instead of on-airport long-term parking, is very low, given also that links between off-airport car parks and hotels will be less convenient than those between on-airport car parks and hotels.</p>
Surface Transport	<p>These representations have shown the considerable disparity which exists in the approach adopted by the Applicant between car parking provision to service a separate additional wide spaced runway to meet a throughput of 95mppa; and car parking spaces required to meet an anticipated throughput of 80.2mppa by 2047, as a consequence of the current DCO application. It is my clients' opinion that a figure of only 1,100 additional on-airport passenger car parking spaces to meet the requirements of the current CCO application is insufficient.</p> <p>In my clients' view there is a need for a replacement Table 5.2.4 where it forms part of Document APP 030. This replacement table should include three separate columns for each on-airport car park, which should indicate:</p>	<p>Table 5.2.3 (as renumbered in ES Chapter 5: Project Description [REP1-016] issued at Deadline 1) shows car parks where changes are being made to provision (spaces lost to construction, replacement spaces and additional spaces) and does not require updating.</p>

Topic	Matter Raised	Applicant's Response
	<p>i) the number of existing passenger and/or staff car parking spaces to be retained as part of the DCO application;</p> <p>ii) the number of new passenger and/or staff car parking spaces to be provided as part of the DCO application; and</p> <p>iii) the resultant number of displaced passenger and/or staff car parking spaces, as a consequence of other forms of development comprising an integral part of the same DCO application</p>	

50 Horley Town Council

50.1.1. Table 50.1 sets out the Applicant's response to the matters raised in the Written Representation from Horley Town Council [REP1-074]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 50.1 Response to Written Representation from Horley Town Council

Topic	Matter Raised	Applicant's Response
Construction noise and air quality	<p>Horley Town Council remains very concerned about noise and dust impacts from the construction phases to our residents in the south of Horley. In our response to the PEIR, we requested more details on the scheme to re-locate those residents suffering the highest noise levels. We note that this is still the intention of Gatwick Airport Ltd (GAL) but we would request that the Planning Inspectorate seeks commitments from GAL on matters such as the type of alternative accommodation. For how long would this last and who covers all the costs? The airport must take into account children's schooling and the work commitments from adults when choosing the locations of the temporary accommodation.</p> <p>We have been informed that GAL plans to have a concrete crusher located in 'car park Y', off the northern perimeter road. There is however no reference to this in the DCO documents so, if the information is correct, we would request the following information:</p> <ol style="list-style-type: none"> 1. The intended hours of operation. 2. Anticipated noise levels generated by this plant when in operation. 	<p>The Applicant has responded to Horley Town Council's concerns regarding construction noise and air quality impacts at Section 3.45 of the Relevant Representations Report [REP1-048].</p> <p>The ES Appendix 5.3.2: Code of Construction Practice [APP-082] sets out measures to minimise noise and vibration from construction activities, including the requirement for contractors to use quieter machinery and equipment and construction methods which are not inherently noisy. The potential for impacts arising from construction traffic have been assessed as not significant. The assessment identifies 9 properties in Horley that may qualify for Noise Insulation at Burstow Court, 48a Longbridge Road and at 275 Balcombe Road, and none expected to qualify for temporary rehousing. The CoCP is secured by Requirement 7 of the draft DCO.</p> <p>Section 5.5 of ES Appendix 5.3.1 Buildability Report – Part A [REP2-013] sets out the expected methodology of the demolition activities (including the concrete crusher) in the NRP DCO, including the proposed location of the concrete crusher. Section 7 of the ES Appendix 5.3.1 Buildability Report – Part A [REP2-013] details the key temporary construction compounds required for the NRP DCO. This section provides information on the anticipated compounds and their</p>

Topic	Matter Raised	Applicant's Response
	<p>3. Anticipated noise levels for the residents in the Longbridge Walk area.</p> <p>4. Assessment on noise impacts to the adjacent hotels.</p> <p>We would ask that an alternative 'on airport' site be considered such as the former maintenance area to the south of the main runway which would have less impact on local communities.</p> <p>Additionally, although initially offered, but subsequently withdrawn, we would wish to see a noise barrier erected on the eastern side of the A23 from the Longbridge Roundabout to the proposed new junction serving the north terminal.</p>	<p>requirements, proposed locations, indicative timelines, sizes and the principal components of each compound.</p> <p>The concrete crusher in the Car Park Y compound would operate during daytime working hours only. The final choice of plant will be made by the Contractor and will be submitted to the local planning authority along with details of best practical means to reduce noise as part of the Section 61 Application before the work begins for their approval. The concrete crusher is not expected to give rise to noise impacts in the hotels or residential properties that are over 120m away.</p> <p>The Applicant has responded to Horley Town Council's request for a noise barrier within Riverside Garden Park at Section 3.45 of the Relevant Representations Report [REP1-048].</p>
Flight paths	<p>In 14.9.142, reference is made to newly overflowed areas. This appears to contradict GAL's statements that the northern runway would use existing flight paths. We would therefore like to see map based evidence of the affected areas</p>	<p>The Applicant has provided a response to concerns regarding flightpaths in its thematic responses at Section 4.5 of the Relevant Representations Report [REP1-048].</p> <p>Paragraph 14.9.142 reads as follows: '<i>Figure 14.9.30 (Doc Ref. 5.2) shows the areas (in red) that would be routinely newly overflowed by the routine departures from the northern runway</i>'. It then goes on to describe the areas shown on the figure. These areas are already overflowed by departures from the standby runway when it is in use, but will be routinely overflowed when northern runway comes into routine operation.</p>
Noise Envelope	<p>We note under 14.13.29, it is proposed that CAA be a body to review the performance of a noise envelope.</p> <p>As such, we would wish to see this role undertaken by the local authorities as we suggested at the Noise Envelope Group meetings in 2022.</p>	<p>Section 7 of ES Appendix 14.9.7: The Noise Envelope [APP-177] describes the process by which compliance with the Noise Envelope will be monitored including reporting to the CAA as Independent Reviewer and publishing the Annual Monitoring and Forecasting Report and action plans. Local authorities will be able to scrutinize the published reports, and if they consider appropriate seek to any action in connection of issues they identify.</p>
Surface Transport	<p>Based upon the evidence made available by Gatwick Airport, which we have scrutinised very closely, we have serious concerns going forward that the transport links i.e. rail, motorway and local road network will not be able to support the proposed growth in passenger and staff numbers.</p> <p>With GAL's commitment to have passengers and staff access the airport via public transport, we have concerns about the railway capacity to meet the growth in the number of passengers with the knock-on effect on commuter</p>	<p>The Applicant has responded to Horley Town Council's concerns regarding railway capacity in the Croydon area at Section 3.45 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	trains serving stations from Horley to London. We understand that there are no plans to introduce more tracks and funding for network improvements in the Croydon/Windmill Junction has never been secured. Is Gatwick able to assure us that, regardless of the demand on rail capacity to support Gatwick's growth, there will be no negative impacts on commuter services, both locally and to London?	
Surface Transport	Horley has for many years and continues to be blighted by airport passengers parking in residential roads, so we are very concerned about the potential for this to worsen significantly with increases in passenger numbers. We note that the airport proposes to increase capacity for on airport parking. However, our view is that Gatwick can provide any number of parking spaces, but if not priced at an affordable rate, then passengers will continue to look at off-airport options, including our residential roads.	The Applicant has responded to Horley Town Council's concerns regarding car parking at Section 3.45 of the Relevant Representations Report [REP1-048] . GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting. Commitment 8 in the ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out GAL's commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or support local authorities in their enforcement actions against unauthorised off-airport passenger car parking. parking
Water Environment	<p>Further to our concerns expressed in our response to the PEIR on the capacity of the Horley Sewage Treatment Works (HSTW) site, the situation since then has deteriorated significantly. With a moderate amount of rainfall, we are experiencing overtopping of raw sewage onto an adjacent public footpath and an open green space in front of a new residential development, Westvale Park. We are informed that Thames Water has agreed that action needs to be taken to prevent the overtopping onto public land, however, at this time, their plans are lacking any detail as this will fall into their next capital programme starting in 2025.</p> <p>We would request the EXA be aware and seek assurances from Thames Water that the HSTW will be able to accept the inevitable increase demands placed upon it, should the DCO application be granted but also the increase in demands from the local community including future planned developments.</p>	The Applicant has responded to Horley Town Council's concerns regarding impacts on the Horley Sewage Treatment Works at Section 3.45 of the Relevant Representations Report [REP1-048] . Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).
Air Quality	The Town Council notes the comments made in the Air Quality chapter (para 13.2.5) in relation to ultrafine particles. As we have pointed out to the applicant in its PEIR response, we understand that aircraft is a key source of ultra-fine particles and understand that there are currently areas of Horley near the airport that have ultra-fine particulate levels in the air comparable to that seen kerbside in central London. We note the applicant's point about the lack of a legislated standard but understand from presentations by Reigate & Banstead Borough Council to the GATCOM steering group (June 2022) that the WHO	The Applicant has responded to Horley Town Council's concerns regarding the assessment of ultrafine particles at Section 3.45 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	<p>have published guidelines on the levels at which ultrafine particle exposure can be considered 'low' or 'high' and that the number of hours 'high' in Horley is greater than that at the kerb of a major road in London.</p> <p>The Town Council also understands from the borough council that PM2.5 is not a good indicator of general risk associated with exposure to ultrafine particles from aircraft emissions, and so it is unclear how the applicant has given consideration to the impact of ultrafine particles on local residents on the Horley Gardens Estate and the wider area as a result of the planned development.</p>	

51 Horsham District Council

51.1.1. Table 51.1 sets out the Applicant's response to the matters raised in the Written Representation from Horsham District Council [\[REP1-075\]](#). Where relevant, the Applicant has provided direction to the relevant sections of the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15).

51.1.2. The Applicant also considers that both the Local Impact reports of the West Sussex Authorities and the written representations of the authorities, including Horsham, are notable for the fact that they do not acknowledge or apply the terms of national policies for aviation, which are at least important and relevant and which should provide a balanced framework for the consideration of the application. Accordingly, **Appendix A** of this Response sets out those policy matters which the Applicant considers should have been acknowledged in the Written Representations and to which significant weight should be attached in any attempt to strike the planning balance in this case.

Table 51.1 Response to Written Representation from Horsham District Council

Topic	Matter Raised	Applicant's Response
Additional Runway Capacity	Horsham District Council is very concerned that expansion of the Airport will negatively impact Horsham District and the Council's agreed position is to oppose additional runway capacity. The Council carried a Notice of Motion on 11 October 2023 to reconfirm its long-standing position on this issue in the light of the expansion proposals. The motion highlighted concerns that expansion will be damaging to the environment, including impacts on noise, pollution and biodiversity as well as to the Council's climate and carbon reduction aims and that the Council does not believe the existing infrastructure, particularly road and rail, is adequate for the Airport's needs.	The Applicant has responded to Horsham District Council's detailed topic specific concerns in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
Water Neutrality	A Position Statement, issued by Natural England in September 2021, indicated that water abstraction for drinking supplies was impacting wildlife sites in the Arun Valley. As a consequence, all new development across the Sussex North Water Supply Zone, which includes Horsham District, is required to be water	The Applicant has responded to Horsham District Council's detailed concerns on the Water Environment at Section 4.7 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).

Topic	Matter Raised	Applicant's Response
	<p>neutral. The recent CG Fry v SoS and Somerset Council High Court judgment (June 2023) means that many consented applications with matters reserved by condition are now also subject to water neutrality requirements. The effect of water neutrality has been to limit the amount of development that will come forward in the short term, although this is expected to recover in the mid to longer term. The rate at which development of new homes and other infrastructure is delivered will depend on the implementation of an off-setting scheme (which the Council is currently developing in partnership with other affected LPAs). This is important context in any consideration the Project's likely impacts on the future of the region.</p>	
Noise Assessment	<p>In the LIR the Council has provided detail of the issues relating to noise and the concerns with the assessment criteria, the consideration of impacts on health and wellbeing, and it has proposed mitigation the Applicant should be seeking to deliver.</p> <p>The Council's view is that locally set thresholds, which take account of the unique set of issues presented by the range of noise and vibration disturbances, and the knowledge about the implications for health and wellbeing, are justified in order to mitigation impacts of the Project.</p>	<p>The Applicant has responded to Horsham District Council's concerns at Section 4.17 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
WIZAD and Airspace Change	<p>The Council considers that controls on the WIZAD Standard Instrument Departure ("S.I.D") route are required to protect the residents of Horsham District. Given the Applicant's assertion that there will be no airspace change required to deliver the airspace capacity stated to result from the Project the Council seek to secure the certainty around aircraft noise the S.I.Ds are intended to provide. Notwithstanding this, there are concerns about the implications for increase congestion resulting from the Project on the outcome of the FASI-South initiative and locking in use of WIZAD in future.</p>	<p>The Applicant has responded to Horsham District Council's detailed concerns of the use of WIZAD at Section 4.17 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
Climate Change	<p>In June 2023 the Council declared a Climate and Ecological Emergency for Horsham District and committed to drive forward action to address this, by achieving carbon neutrality and helping wildlife to thrive.</p> <p>Horsham District Council's Climate Action Strategy was published in January 2024 and prioritises specific actions to make large carbon savings across five categories; Buildings, Energy, Land Use, Transport and Waste. Key enablers include using planning and planning policy to ensure development is both sustainable and low carbon to help achieve carbon neutrality, and education</p>	<p>The Applicant has responded to Horsham District Council's detailed concerns regarding greenhouse gases at Section 4.13 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	<p>and behaviour change amongst residents and businesses. This is a key consideration for decisions made by the Council, recognising the significant, long-lasting and often irreversible impacts of projects and development.</p> <p>The Council fully supports the concerns raised in the LIR and does not seek to repeat them in this written representation, however it wishes to raise significant concerns about the effect the Project would have on HDC's ability to perform on its Climate policies. This relates not just to aviation policy generally, but also to the lack of meaningful and ambitious targets the Applicant has presented in respect of improving, facilitating and encouraging uptake of sustainable and active travel modes in accessing the airport both directly and indirectly.</p> <p>The Council is concerned with the Applicant's failure to account for well-to-tank (WTT) emissions and considers it essential that the total emissions figure arising over the life of the scheme is calculated by the Applicant and reported accurately. In addition, we note the Applicant under-reporting aviation emissions by around 20%, which would result in 1,106,530tCO₂e not being accounted for in 2028 alone during the most carbon-intensive year, where 5.327 MtCO₂e was estimated to be released which has to be of further concern.</p>	
Transport	<p>The Council supports the comments made by the highways authority to date. HDC has expressed concern in the RR and PADSS submissions about the potential impacts of the Project on the transport network in Horsham District in particularly rural roads in the north which are often subject to "rat running".</p> <p>The Council also considers there is an opportunity for the Applicant to work with the Council to deliver a number of enhancements to the local transport network in the District. These include infrastructure changes to allow bus prioritisation and segregation to allow for time savings when using bus services to access the airport and, more specifically, support for the delivery of a multi-modal transport corridor outlined in the West Sussex Transport Plan, which would benefit those accessing the airport, and assist the Applicant in meeting mode share targets.</p>	<p>The Applicant has responded to Horsham District Council's detailed concerns on transport at Section 4.14 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
Air Pollution	<p>The Council fully supports the concerns raised in the LIR and does not seek to repeat them in this written representation, however it wishes to raise significant concerns about the effect the increased air pollution burden on both the</p>	<p>The Applicant has responded to Horsham District Council's detailed concerns on those topics in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	existing residents of Rusper parish, and future residents of the proposed West of Ifield housing development.	

52 Horsham Trafalgar Neighbourhood Council

52.1.1. Table 52.1 sets out the Applicant's response to the matters raised in the Written Representation from Horsham Trafalgar Neighbourhood Council [\[REP1-076\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 52.1 Response to Written Representation from Horsham Trafalgar Neighbourhood Council

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	<p>Heathrow's plans for a third runway were found unlawful in 2020 because the Paris Agreement had not been fully considered and this is currently the case here for Gatwick Airport.</p> <p>Climate change is a huge issue. It's impossible to properly assess the impact of creating a new fully usable runway without considering its impacts on emissions from arriving and departing aircraft, as well as fine particulate matter from transport's tyres (the invisible killer).</p> <p>DeSmog (Transport & Environment, ODI and the International Council on Clean Transportation) in 2021 said London's six airports make it the most polluting city worldwide by aviation emissions. Findings from the interactive tool, Airport Tracker, displays the emissions of 1,300 airports worldwide; Heathrow is the second highest contributor of CO2 of all the world's airports, so to make Gatwick the same size would certainly help London remain in the unenviable place of top polluter; not at all in line with the Government's legally binding targets on net zero.</p> <p>Fewer than 1% of the population cause over half the emissions. This private company is enabled to allow the wealthy few to cause the problems for the rest of the world as well as locally around the Gatwick site.</p>	<p>The Applicant has responded to Horsham Trafalgar Neighbourhood Council's concerns regarding greenhouse gases at Section 3.46 of the Relevant Representations Report [REP1-048].</p> <p>With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.</p> <p>The Applicant has responded to concerns from Interested Parties regarding air pollution worsening as a result of the Project at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Greenhouse Gases	<p>The Secretary of State needs to acknowledge that the Aviation National Policy Statement (ANPS) is out of date and potentially illegal. This should be reviewed before making this important decision about Gatwick, especially as the government's own Climate Change Committee advisors' recommendations to stop all UK airport expansion have been ignored, even though the government itself declared that we are now in a Climate Emergency. It seems</p>	<p>The Applicant has responded to Horsham Trafalgar Neighbourhood Council's concerns regarding greenhouse gases at Section 3.46 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<p>that GAL has deliberately underplayed the impacts, and voluntary agreements will never suffice in such circumstances, when it is not currently being adequately open and honest, for example by not including damaging gases other than CO2 in the estimates, and the and blanket-like insulating contrails are not even measured by GAL in their planning.</p>	<p>The ANPS has not been found to be out of date or illegal. It stands as part of the Government's framework of aviation policy.</p> <p>The Government has set out its continuing approach to policy development in relation to non-CO2 GHG, both in the Jet Zero Strategy and most recently in Jet Zero One Year On (which confirms at page 33 that the Government is committing to further research the effect of non-CO2 impacts in order to develop any necessary policy response).</p> <p>These matters were considered at the Stansted inquiry in 2021 where the Inspectors concluded:</p> <p><i>“98, in this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the proposed development, particularly bearing in mind the government's established policy objective of making the best use of MBU Airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity – changing development, including at MBU airports, which seems far removed from the government's intention.”</i></p>
<p>Water Environment</p>	<p>Water quality seems to be at an all-time low, and from 16 pumping stations around the River Mole, surface water runs into sewage works, and then overflows into streets and playgrounds.</p>	<p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p>

Topic	Matter Raised	Applicant's Response
		<p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and</p>

Topic	Matter Raised	Applicant's Response
		Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).

53 Hugh Fairs

53.1.1. Table 53.1 sets out the Applicant's response to the matters raised in the Written Representation from Hugh Fairs [\[REP1-196\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 53.1 Response to Written Representation from Hugh Fairs

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	The proposed increase in flights will increase CO2 emissions by 35% at Gatwick. (Gatwick's own figures). There will also be an associated increase on CO2 emissions due to the growth in motor traffic locally to Gatwick in a rural area. The UK has signed up to achieve net zero by 2050. This proposed increase in air traffic will blow a huge hole in our international legal obligations to achieve this aim. What extra cuts are we all to make to allow an expansion in emissions associated with Gatwick flight expansion. It is worth noting that from 1989 until the present day the CO2 emissions caused burning fossil fuels equals ALL the man-made emissions since the beginning of industrialization	The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .
Forecasting and Need	1989 was around the start of cheap short haul flights to holiday destinations. The proposed increase in flights is largely to accommodate more of these short haul flights. There is little freight capacity at Gatwick and so this increase in flights is not part of building 'Global Britain' and increasing international trade. It is merely allowing more people to holiday cheaply abroad.	The Applicant has responded thematically to concerns raised by Interested Parties that Gatwick Airport is just a holiday airport at Section 4.21 of the Relevant Representations Report [REP1-048] .

54 Hugh Miller

54.1.1. Table 54.1 sets out the Applicant's response to the matters raised in the Written Representation from Hugh Miller [\[REP1-235\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 54.1 Response to Written Representation from Hugh Miller

Topic	Matter Raised	Applicant's Response
Traffic and Socio-Economics	Local Authorities will obviously be for this. However, the reality is that the road network cannot cope with any more traffic as house building continues relentlessly. The jobs created are not good jobs and not conducive to normal	The Applicant has responded thematically to comments made within relevant representations regarding traffic, noise and the job opportunities created by the

Topic	Matter Raised	Applicant's Response
	happy homes. Aircraft continually wait, engines running, waiting for a stand. No staff to do the jobs so how on earth is putting more aircraft into LGW going to help.	project at Sections 4.26, 4.22 and 4.25 (respectively) of the Relevant Representations Report [REP1-048] .

55 Ian Slaughter

55.1.1. Table 55.1 sets out the Applicant's response to the matters raised in the Written Representation from Ian Slaughter [\[REP1-197\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 55.1 Response to Written Representation from Ian Slaughter

Topic	Matter Raised	Applicant's Response
General	<p>The plans will produce more pollution, noise, emissions from planes themselves and the people that travel to use them. There is no regard to the welfare of local residents, the wider communities, environment, ecology and unfathomable given the climate crisis. This is purely a commercial development which should never have been allowed to get this far.</p> <p>It is obscene that Gatwick has been allowed to develop the current plans given it was rightly unsuccessful with a brand new second main runway that went through a more public and political review. There has never been adequate local infrastructure to cope with the current Gatwick pressures let alone adding to this.</p> <p>On a purely personal point of view for my children and family, their standard of living will plummet. We cannot afford to move house and shall be trapped here with planes flying in much closer proximity/over our house</p>	<p>The Applicant has undertaken an Environmental Impact Assessment as part of the DCO Application which sets out the effects anticipated as a result of the Project. Where an adverse significant effect has been identified, the Applicant has proposed mitigation – set out in each topic-based assessment. This includes consideration of the impact on local infrastructure.</p> <p>The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.</p>

56 International Airlines Group and British Airways

56.1.1. Table 56.1 sets out the Applicant's response to the matters raised in the Written Representation from International Airlines Group and British Airways [\[REP1-198\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 56.1 Response to Written Representation from International Airlines Group and British Airways

Topic	Matter Raised	Applicant's Response
<p>General: Affordability</p>	<p>Expansion must be affordable for consumers and we need to be confident in the cost of delivery. It is critical that the costs of any future expansion be controlled to ensure affordability. While we are supportive of airport expansion as a general principle, we do not support expansion at any cost. While a headline figure of £2.2B has been shared regarding the cost of the Project, we have yet to see a detailed breakdown of scope and cost, how GAL intends to finance the Project and the projected overall impact of the Project on airport charges. A symbiotic relationship exists between airport charges and our ability to meet consumer demand. GAL must ensure that charges do not inflate to the point that results in certain flying becoming economically unviable and ultimately reducing consumer choice. We would encourage GAL to develop a financing plan for the Project that sees airport charges fall overtime driven by the projected increase in passenger numbers at the airport. We would request that GAL presents a fully costed, multi-year master plan of future developments at LGW – which includes the Project – and a plan of finance and projected impact on airport charges over time. While GAL may opt to finance some of the works through airport charges under its current commitments framework set by the Civil Aviation Authority – under which it strikes deals with airlines on price and quality – it is important to remember that it is regulated monopoly infrastructure, and its charges have to be based on efficient costs. We also note that GAL has applied to the CAA to extend the commitments framework from 2025 to 2029, and we look forward to examining a proposal of how the project will be financed by airport charges in the next years.</p> <p>We remain sceptical that the Project can deliver upon one of its claimed benefits – to serve 75M passengers a year by 2038 – without significant and expensive investment in airfield and terminal infrastructure to handle an almost 70% increase in passenger volume over 2019 levels.</p> <p>We have further concerns about unidentified future investments in surface access to the airport should passenger numbers reach the levels projected by the airport. In short, we do not believe that the costs as presented fully encapsulate the entirety of the investment required to deliver the full benefits of the Project and we encourage GAL to provide greater detail and transparency in its own submissions.</p>	<p>The Applicant has provided responses to the points raised by International Airlines Group and British Airways at Section 3.12 of the Relevant Representations Report [REP1-048].</p> <p>As part of the conditions of the economic licence issued by the CAA, GAL makes a set of 'commitments' which include a ceiling on the average level of airport charges, a minimum level of investment and a system of rebates if certain service quality targets (known as core service standards) are missed. The current commitments were introduced in 2021 and cover a four year period to 31 March 2025. Following discussions with the airlines, in March 2023, GAL submitted a proposal to the CAA for the current set of commitments to be extended for a further four years – until 31 March 2029. The CAA has consulted on GAL's proposal and is now considering its next steps. As part of this extension proposal, GAL has confirmed that it will bear all of the planning, development and delivery costs associated with the Northern Runway Project within the extended Commitments period.</p> <p>Following a decision by the CAA on the current extension proposal, GAL will be required to bring forward a further set of commitments, two years before the end of that commitment period. At this stage it is likely that the outcome of the NRP planning process would be known, and in a similar way to which GAL engages with the airlines today, GAL would consult with the airline community and bring forward proposals for the level of airport charges for the next regulatory period. Following the same process as is in place today, the CAA would consult on the proposals and then set a level as part of issuing GAL's economic licence.</p> <p>Our ES Appendix 5.4.1: Surface Access Commitments [APP-090] document sets out the initiatives and mitigation that GAL will adopt in order to meet the binding mode share targets set out in the DCO. These are fully funded by GAL. Funding levels for some of the initiatives are set out in the draft Section 106 Agreement, being discussed with local authorities, Network Rail and National Highways. These include the retention of the Sustainable Transport Fund, which supports public transport and active travel investment, a Bus and Coach fund of at least £10m and a reserve of a further £10m as a Transport Mitigation Fund to address any unforeseen impacts that may arise in the future, as a result of the project. These specific funds are in addition to the funding of the highways mitigation and active travel improvements to improve accessibility to the airport.</p>

Topic	Matter Raised	Applicant's Response
General: Cost Transparency	<p>We must be able to scrutinise costs of development in an open book and transparent way. We encourage GAL to take a collaborative approach to cost transparency during the pre-planning, planning and construction stages of the delivery of the Project. At British Airways and indeed across IAG and our sister companies, we are exposed to airport development projects throughout the world and have access to considerable benchmarking and cost data that will be helpful in ensuring the overall affordability of the Project. As such, we believe that we can add value to the Project through robust engagement and participation in the Project at all stages of its lifecycle.</p> <p>British Airways can play an important advocacy role on behalf of consumers through its active participation in the Project. However, in order for this collaboration to work, GAL must share scope, cost and other information regarding the Project in an open book manner. We encourage the Planning Inspectorate to require cost transparency by GAL in any contemplated approval of the Project.</p>	Noted. Discussions of this nature can be discussed bilaterally.
General: Environment and Sustainability	<p>The programme must have the strongest of environmental credentials and manageable wider community impact. Our parent company, IAG, is determined to be the world's leading aviation group on sustainability. That means using our scale, influence and track record to not only transform our business but drive the system-wide change required to create a truly sustainable aviation industry.</p> <p>We are committed to delivering best practices in sustainability programmes, processes and impacts. Creating a truly sustainable business is fundamental to our long-term growth. As such, airport development programs at our key airports are also critical for our success and our long-term growth. The Project is no exception to this. We would encourage GAL to share a detailed plan on how it intends to deliver the Project through sustainable construction methods using recycled and natural materials; how it plans to make the airport more environmentally sustainable over time including energy efficiency; use of sustainably powered equipment and vehicles; and incorporating green ground transportation options into the Project.</p> <p>We note that there has been significant input from community stakeholders on the environmental and noise impacts, as well as concerns regarding surface access to the airport, of the Project and we encourage GAL to urgently propose meaningful mitigations to address these concerns. We also encourage GAL to</p>	<p>The ES Appendix 5.3.1: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences. The Applicant welcomes comments on the approach proposed during this examination. In the interim, commentary has been provided in respect of the mitigation proposals below.</p> <p>Details of the plans for construction of the Project have been submitted as part of the DCO application – see the ES Appendix 5.3.2: Code of Construction Practice [REP1-021] and its annexes. These are consistent with the current stage that the design maturity.</p> <p>The Applicant's included a ES Appendix 5.4.2: Carbon Action Plan (CAP) [APP-091] as part of its DCO submission. In terms of sustainable construction, one of the main commitments the Applicant has made in the CAP is to deliver the Project within a carbon budget of 1.15 MtCO_{2e}. This will require a wide variety of strategies including the use of recycled and natural materials. Further details are set out in the Construction Carbon Management Strategy (Doc Ref. 10.18).</p> <p>The Applicant's sustainability policy, the Decade of Change, details the sustainable outcomes the airport is committed to achieving by 2030. The Decade covers the full remit of sustainability and is split into three themes: People and Community, Net Zero and Local Environment. The Decade of Change includes a commitment</p>

Topic	Matter Raised	Applicant's Response
	<p>work closely with us to advocate for the creation of a robust U.K. marketplace in the development of sustainable aviation fuel and consider how this mutually beneficial outcome could be incorporated into the Project.</p>	<p>to “Achieve Net Zero for GAL Scope 1 and 2 GHG emissions by 2030” and “Requiring all GAL and airport duty vehicles, ground support equipment and mobile construction equipment to meet zero or ultra-low emission standards by 2030”.</p> <p>Full details of the Applicant’s approach to sustainability (including the Decade of Change policy and annual performance summaries) can be found on the Applicant’s website: https://www.gatwickairport.com/company/sustainability.html. The Applicant is committed to the Decade of Change outcomes independently of the Project.</p> <p>Details of the Applicant’s approach to surface access can be found ES Appendix 5.4.1: Surface Access Commitments [APP-090]. We note that there are many different views on surface access provision. GAL has committed to binding sustainable mode share targets in its ES Appendix 5.4.1: Surface Access Commitments [APP-090] that equal or exceed any existing or planned targets at other airports in the UK. At the same time we acknowledge our passenger and staff travel catchment means that public transport and active travel may not be a feasible option for some, so we provide on-airport parking capacity consistent with meeting our mode share targets but allowing for some growth. We have included in our DCO submission improvements to local roads that will benefit both airport and non-airport road users and reduce congestion that would otherwise occur without the Project.</p>
<p>General: Consumer Benefits</p>	<p>The right incentives need to be in place for expansion to be delivered for the primary benefit of consumers, now and in the future. Our clear view is that GAL must set clear expectations, and indeed measurable metrics, on how the Project will deliver consumer benefits. Any incentive to GAL should be constructed around these metrics and GAL must not be rewarded for simply making the investment itself. GAL must be held accountable to ensure the benefits of expansion to consumers and airline operators are delivered and we encourage the Planning Inspectorate to set meaningful operational measures of success to ensure GAL delivers the Project in a fit for purpose fashion.</p>	<p>The Applicant has provided responses to the points raised by International Airlines Group and British Airways at Section 3.12 of the Relevant Representations Report [REP1-048].</p>
<p>Operational resilience</p>	<p>Proven reliability of operations, including having in place the appropriate infrastructure and resilience for the expected aircraft movements and passengers. Our view is LGW’s current operational performance is poor and we have significant concerns about performance at its current capacity, let</p>	<p>In the wake of Covid where resources were necessarily cut back, the industry as a whole has struggled to cope with the dramatic ramp up in demand experienced over the past two years. Despite this Gatwick was able to maintain high standards of service passing 99% of the 46 monthly CSS targets in 2023 and achieving 100% pass rate so far this year. Looking forward, Gatwick is committed to improving operational performance and has assessed the infrastructure and resource</p>

Topic	Matter Raised	Applicant's Response
	<p>alone its ability to successfully manage the proposed increases brought by the Project.</p> <p>GAL sets itself, and commits to its airlines, to an On Time Performance (OTP) target (departures within 15 minutes of schedule) of 70% in summer and 75% in winter. The airport is a long way from operating consistently at that level, particularly over the summer season, evidenced by performance across the aerodrome which in summer 2023 averaged 45% at D15 (37.4% in Q3).</p> <p>Significant investment is required in infrastructure to reduce airfield and stand congestion, taxi times and accommodate the volumes being processed now, which is why improving operational performance has to be a critical success factor for the Project.</p> <p>As noted earlier, in order to achieve the passenger numbers suggested by GAL (i.e. 78M passengers a year by 2038), we believe significant new terminal capacity will need to be added to the airport. It is inconceivable that such a level of passenger growth could be accommodated either in the existing terminal infrastructure or without material investment in new infrastructure. We</p>	<p>requirements to accommodate the additional traffic delivered through the proposed development project using detailed simulation modelling along with proven operational performance metrics. Gatwick remains confident that it can deliver the proposed development while continuing to maintain excellent performance for its customers.</p> <p>On Time Performance is an industry output metric recognising the performance of airlines in and out of airports. The inputs to the departure metric stated are made of multiple parts of the eco system, but fall into 3 clear areas:</p> <ol style="list-style-type: none"> 1. Is the aircraft 'Ready to Go' on time: loaded with passengers and bags, doors closed, tug & bar attached and ready to push back? 2. Do the Tower then provide a service to the ready aircraft so it can pushback on time? 3. Can the network accept the departing aircraft without restrictions? <p>The Applicant studies these matters closely. Of the ~54% loss of departure performance stated in Summer 2023, Gatwick's performance monitoring shows ~7% could be equated to Airport accountable, which GAL is working with airlines and Air Traffic providers to improve. ~7% was the impact of restrictions away from Gatwick (Airspace) but ~40% of performance loss was attributed to the Ground Operation of the aircraft by the airline itself and its contracted parties.</p> <p>Gatwick has taken the leadership position in regard on time performance working with airline, their contracted 3rd parties and Air Space actors in the interest of improving the Gatwick passengers punctual journey. As an example London Gatwick is trialling 'smart stands' with the support of airlines to improve aircraft turn performance.</p> <p>London Gatwick runs an air traffic management and airfield infrastructure optimisation programme, including projects such as Reduced Departure Separation, Time-Based Separation on arrival and the construction of a new, optimally sited Rapid Exit Taxiway (RET), targeted at enhancing operational resilience. These projects were referenced in ISH1 (Written Summary of Oral Submissions from ISH1: Case for Proposed Development [REP1-056]) and are set out in more detail in section 3.3 of the Capacity and Operations Summary Paper [REP1-053]. Additional pier-served stand infrastructure is being added with the Pier 6 Western Extension project which is under construction. However, these projects cannot improve resilience or capacity to the extent that is achieved by the proposed Northern Runway project development, in particular due to the lack of first wave capacity available in the single runway operation. The projects cited above, in combination with the introduction of a parallel dependant runway - which will decongest the current single runway operation - will significantly improve the airport's capability and resilience, in turn reducing the potential for airport induced delay, demonstrated by the reduction in departure and arrival runway holding times detailed in Capacity and Operations Summary Paper [REP1-053] section 5. Further details of the resilience benefits under the NRP scheme can be found in [APP-250] section 7.2.</p>

Topic	Matter Raised	Applicant's Response
	<p>would urge GAL to share its plans to accommodate passenger growth contemplated by the Project.</p> <p>In addition, air traffic control (ATC) provision at LGW over the past two years has not met the required standard and the operation in the tower has not been resilient to resource disruption. This has been a major contributor to poor aerodrome performance and although airlines have been reassured that steps have been taken to significantly improve the resource position in 2024 we still consider this our most significant operational risk. Mitigations must be in place and a resilient service delivered consistently before the airport is able to further increase capacity.</p> <p>Alongside ATC resilience at Gatwick, we have significant reservations about the current ability of airspace around London and the South East to cope with the levels of additional capacity proposed by GAL. The costs to airlines of disruption are excessive and it is very challenging to successfully deliver an on-time schedule with the current levels of aerodrome performance.</p> <p>We are sceptical of GAL's view that the current airspace structure and existing routes are sufficient to support future increased capacity delivered by the Project and we encourage the Planning Inspectorate to closely examine this claim.</p> <p>In conclusion, we believe that a significant number of questions remain unanswered with regards to GAL's proposals and the Project itself, but we are committed to working with GAL over the coming months to look to address the concerns we have raised both bilaterally and within this submission.</p>	<p>The airfield infrastructure developments of Taxiways such as Lima extension, additional stands and Pier 7 are all contained within the submission in the Planning Statement [APP-245] in section 4.5. Taxiway modelling has been conducted to ensure airfield flow is maintained as details in Capacity and Operations Summary Paper Appendix Airfield Capacity Study [REP1-054].</p> <p>The terminal infrastructure developments are all summarised within the submission in the Planning Statement [APP-245] in section 4.5. Full details of the planned NRP terminal developments to accommodate passenger growth can be found in Section 5.7 (Northern Campus) of Volume 3 of the Design and Access Statement [REP2-034] and Section 5.10 (Southern Campus) of Volume 4 of the Design and Access Statement [REP2-035].</p> <p>Gatwick took the decision in consultation with its airlines to transition providers to NATS as its new Air Traffic Provider, the transition period took 18 months and was completed in Oct 22. NATS have been working to increase the volume of Valid Air Traffic Controllers increasing resilience following the inability to train ATCOs during the COVID period of 2 years. NATS have confirmed the stability of Gatwick's tower going forward.</p> <p>Section 4 of ES Chapter 14: Noise and Vibration [APP-039] and Capacity and Operations Summary Paper [REP1-053] explain the Project does not require the routings of aircraft to or from the airport to be changed (see CAA airspace change proposal ACP-2019-81). London Gatwick's current airspace design includes Standard Instrument Departures (SID) and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>Departure route separation requirements along with the optimisation of the sequencing of departing aircraft are described comprehensively in Capacity and Operations Summary Paper [REP1-053] with the supporting model data captured in Capacity and Operations Summary Paper Appendix: Airfield Capacity Study [REP1-054].</p> <p>GAL is separately taking forward airspace change under the Government sponsored Airspace Modernisation Programme, Capacity and Operations Summary Paper [REP1-053], para 1.2.12 and while the London Gatwick operation will benefit directly as a result of this programme it is not a pre-requisite to deliver the Northern Runway Project. The London Terminal Manoeuvring Area (LTMA) airspace is complex, necessarily integrating the arrival and departure routes for all</p>

Topic	Matter Raised	Applicant's Response
		<p>of the London airports, and as identified by the JLAs in Local Impact Report Appendices [REP1-069], Appendix F, the timeline for the delivery of this complicated, multi-sponsor enterprise has yet to be finalised.</p> <p>However, the Applicant, alongside NERL, is co-sponsoring the London Airspace South (LAS) airspace deployment under the same programme which is a comparatively simple airspace change that can be deployed much sooner than the rest of the LTMA airspace, realising benefits earlier than might otherwise have been the case.</p> <p>In particular for London Gatwick, London Airspace South is expected to increase capacity and reduce the air traffic controllers' workload thereby strengthening resilience, reducing delays on the ground pre-departure caused by capacity constraints in the airspace and potentially increasing runway throughput during busy periods.</p> <p>The beneficial geographical location of London Gatwick, to the south of the congested and complex LTMA airspace, means it is easier to take forward airspace change here compared to the north of London Gatwick, which would involve the other main London airports. The deployment of London Airspace South is scheduled in Q1 2027.</p> <p>In preparation for London Airspace South NATS has tested the London terminal airspace with additional London Gatwick traffic, replicating a Dual Runway Operation movement schedule. The qualitative feedback as a result of the simulation validated that the current measures to manage traffic demand and the existing airspace route structure could safely integrate the additional air traffic movements.</p>

57 Jacqueline Phillips

57.1.1. Table 57.1 sets out the Applicant's response to the matters raised in the Written Representation from Jacqueline Phillips [\[REP1-199\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 57.1 Response to Written Representation from Jacqueline Phillips

Topic	Matter Raised	Applicant's Response
Climate change and Greenhouse Gases	<p>Opposed to Gatwick's expansion plans on climate grounds. GAL claims that it 'recognises fully the urgency of tackling global climate change and reducing global greenhouse gas emissions, to which aviation is a major contributor' (PS 2.6.6) Can GAL explain why it thinks airport expansion is consistent with recognising the above?</p> <p>Given its recognition of the urgency to tackle global climate change and to reduce emissions does GAL consider that basing its greenhouse gas emissions scenarios on a Jet Zero Strategy, which the Governments advisers the Climate Change Committee describe as "high risk due to its reliance on nascent technology", is a reasonable or responsible approach?</p>	<p>The Applicant has responded thematically to comments made within relevant representations on greenhouse gases, and the Jet Zero position on uncertainty around future technological development at Section 4.16 of the Relevant Representations Report [REP1-048].</p>

58 Jacqui Hill

58.1.1. Table 58.1 sets out the Applicant's response to the matters raised in the Written Representation from Jacqui Hill [\[REP1-200\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 58.1 Response to Written Representation from Jacqui Hill

Topic	Matter Raised	Applicant's Response
Climate Change	<p>With the pressure on the environment at such a critical level why would any responsible person consider an expansion to an airport as a good idea? We MUST take this issue seriously and be prepared to take the decisions that future generations will judge us by. Please do not sacrifice the environment of the future for the airport owners greed</p>	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048].</p>

59 Jean Morriss

59.1.1. Table 59.1 sets out the Applicant's response to the matters raised in the Written Representation from Jean Morriss [\[REP1-238\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 59.1 Response to Written Representation from Jean Morris

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	I am strongly opposed to this application for a second runway at Gatwick. These are the reasons: 1. It will add to climate change problems with increased carbon emissions.	The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .
Greenhouse Gases and Policy	2. The emergency runway cannot be used at the same time at the existing runway so this is an application for a new runway and so this application is NOT government policy i.e. to make best use of existing facilities. The enormous construction work is for a new runway as it is so extensive. It is very surprising that the application has got as far as it has, as it flies in the face of all efforts to reduce use of fossil fuels. It is not right to even consider allowing it when we are all trying to do our bit to reduce carbon usage.	The Applicant has responded thematically to concerns raised by Interested Parties regarding compliance with greenhouse gases and government policy, respectively, at Sections 4.16 and 4.21 of the Relevant Representations Report [REP1-048] .
Surface Transport	3. Increase in traffic on already overcrowded roads in the area both during construction and with increase in passengers is very unwelcome.	The Applicant has responded thematically to concerns raised by Interested Parties regarding congestion at Section 4.26 of the Relevant Representations Report [REP1-048] .
Surface Transport	4. Overcrowding on the already overcrowded rail line makes life hard for commuters.	The Applicant has responded thematically to concerns raised by Interested Parties regarding rail at Section 4.26 of the Relevant Representations Report [REP1-048] .
Water environment	5. Increase in flood risk and conversely increase in piped water shortages.	The Applicant has responded thematically to concerns raised by Interested Parties regarding flood risk at Section 4.27 of the Relevant Representations Report [REP1-048] .
Noise	6. NOISE everywhere. The noise from Gatwick is already unbearable for some residents and affects health and wellbeing. More noise and inevitably new and/or concentrated flight paths bringing misery.	The Applicant has responded thematically to concerns raised by Interested Parties regarding noise and flightpaths at Section 4.21 of the Relevant Representations Report [REP1-048] .
Socio-Economics	7. Loss of tourism to some rural businesses as the increased noise will put people off visiting areas far away from Gatwick as the noise covers such a vast part of Surrey, Sussex and Kent. The increased noise will have a bad effect on businesses that sell a countryside/natural setting such as wedding venues and local historic attractions as well as the hotels that serve them.	The Applicant has responded thematically to concerns raised by Interested Parties regarding the impacts of the Project on tourism at Section 4.25 of the Relevant Representations Report [REP1-048] .
Ecology and nature conservation	8. Ashdown Forest is as sensitive and environmentally important area. It is attractive to visitors wanting outdoor recreation but already suffers from Gatwick arrival noise during a Westerly operation. It is a site of special scientific importance and a special protected area. Gatwick's ambitions run roughshod over efforts to protect the Ashdown Forest and will bring even more unwelcome noise over a precious area of threatened lowland heath that is held dear by local people and local businesses that rely on the proximity of the attractive landscape for their customers.	The Applicant has responded thematically to concerns raised by Interested Parties regarding impacts on ecological designations at Section 4.13 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
Socio-Economics: Housing supply	9. Inward migration of workers will exacerbate housing shortages in the area (Crawley has declared a housing emergency). If there are no houses, then of course commuting will be made far more difficult for everyone on the already overcrowded roads in the area	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding the impacts of the Project on housing at Section 4.25 of the Relevant Representations Report [REP1-048].</p> <p>ES Appendix 17.9.3: Appendix of Population and Housing Effects [APP-201] addresses the population and housing effects of the Project; the assessment finds there is a sufficient supply of housing to accommodate both the construction and operational workforce. The Applicant's Response to Actions – ISHs 2-5 [REP2-005] ISH3 Action Point 4 provides the Applicant's response to the Housing Emergency declared by Crawley Borough Council.</p>

60 Jennifer Anne Tomlinson

60.1.1. Table 60.1 sets out the Applicant's response to the matters raised in the Written Representation from Jennifer Anne Tomlinson [\[REP1-201\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 60.1 Response to Written Representation from Jennifer Anne Tomlinson

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	Any airport expansion in the next few decades is not going to help the UK (let alone the world) reach Net Zero any time soon. No airports should be expanding capacity or celebrating their growth, unless or until aircraft are truly free of greenhouse gases (GHG) and other dangerous emissions. Gatwick makes a big play about the "greening" of their on-site airport facilities, totally ignoring the "elephant in the room" of the hundreds of fossil-fuelled aircraft flying in and out of the airport every day of the year, whose emissions dwarf that of the airport itself. We all know that the sooner we stop burning fossil fuels, the lower will be the cost of dealing with the effects of climate change in the future. The slower we are at taking appropriate action, the worse will be the effects of climate change – and the sooner we shall all be suffering from climate breakdown – at enormous cost to everyone.	The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .
General	<p>Any expansion at Gatwick airport, however achieved, will cause:</p> <ul style="list-style-type: none"> • More noise (even if individual aircraft get slightly quieter) • More mental health problems for residents • More air pollution • More physical health problems for residents 	<p>The Applicant has responded to these general themes raised at Section 4 of the Relevant Representations Report [REP1-048].</p> <p>The ES Statement Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • Reduced house values • Continued decline in wildlife (at all levels) in the surrounding countryside • A less-pleasant rural environment • More congested roads • More congested trains • More flooding • More sewage problems • And of course, continued global heating and extreme weather events 	how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.

61 Jill Green

61.1.1. Table 61.1 sets out the Applicant's response to the matters raised in the Written Representation from Jill Green [\[REP1-202\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 61.1 Response to Written Representation from Jill Green

Topic	Matter Raised	Applicant's Response
Air Quality	One of my major concerns being a resident in Lingfield for 32 years, is that fuel has been dumped from Aircraft coming into land – when this happens in the summer months, it is over gardens, clothes and the houses – the smell is obvious, and it makes eyes run. This is not good for the environment nor the health of residents under the pathway...I believe this shouldn't be happening; but it does! (A bit like sewerage being dumped into our rivers – fines don't seem to alter the fact that it happens nor changes the need to do so!).	The Applicant has responded to concerns raised regarding the jettisoning of fuel at Section 4.3 of the Relevant Representations Report [REP1-048] .
Noise	The noise from the planes has increased with more planes arriving late at the airport. When we first moved here, we were under the impression that planes would not be landing or taking off between midnight and 6am. This is obviously no longer the case!	<p>The Applicant has responded to concerns raised regarding night flights at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The assessment assumes the extant Night Restrictions imposed by the DfT through the Civil Aviation Act 1982 will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work, as currently is the case. As a result, the size of the Leq 45 dB Night LOAEL noise contours at night (between 2300 and 0700) with the Project will be smaller than in the 2019 baseline (due to the future baseline</p>

Topic	Matter Raised	Applicant's Response
		otherwise providing quieter conditions due to fleet modernisation, see ES Table 14.9.6).
Surface Transport	Transport-wise, the M25 is already chocker blocked for residents around junction 6/7 – if another runway is going to be placed in the area, this is a major consideration, not just from traffic flow and noise, because of increased air pollutions all the way around. If this give a good reason for extending ULEZ payments into this area, then I think we all need to think about a convenient park and ride carpark on the outskirts of the M25 – away from ULEZ, serving the second runway - so the electric clean energy buses can be used for transport.	Comprehensive strategic modelling has been undertaken and the extent of the Area of Detailed Modelling is shown in Diagram 5.3.3 of the Transport Assessment [AS-079] and includes the M25 Junctions 6 and 7. No significant effects have been identified at these locations as a result of the Project. It should be noted as set out in paragraph 11.2.11 of the Transport Assessment [AS-079], GAL part-funded the introduction of hydrogen buses on Metrobus services, which are in operation.

62 Joanna Lewars

62.1.1. Table 62.1 sets out the Applicant's response to the matters raised in the Written Representation from Joanna Lewars [REP1-203]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 62.1 Response to Written Representation from Joanna Lewars

Topic	Matter Raised	Applicant's Response
Compulsory Acquisition & Noise and Vibration	This is an unnecessary commercial project that will not only affect households from the compulsory acquisition's but the disruption of peace of surrounding communities with heightened aviation noise levels.	The Applicant has responded to general themes raised regarding the need for the Project, land requirements and noise at Sections 4.21, 4.7 and 4.22 of Relevant Representations Report [REP1-048].

63 John Edward Telling

63.1.1. Table 63.1 sets out the Applicant's response to the matters raised in the Written Representation from John Edward Telling [REP1-204]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 63.1 Response to Written Representation from John Edward Telling

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	The emissions from flying are contributing to an imminent climate change environmental crisis. Increasing flying is madness and a betrayal of future generations.	The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Sections 4.16 of the Relevant Representations Report [REP1-048].
Noise and Vibration & Health and Wellbeing	Loss of sleep through interruption from aircraft noise is a health hazard for the population affected. Night flying should be banned.	The Applicant has responded thematically to concerns raised by Interested Parties regarding noise and impacts on health at Sections 4.22 and 4.17 of the Relevant Representations Report [REP1-048].

64 Jonathan Andrew Swift

64.1.1. Table 64.1 sets out the Applicant's response to the matters raised in the Written Representation from Jonathan Andrew Swift [\[REP1-205\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 64.1 Response to Written Representation from Jonathan Andrew Smith

Topic	Matter Raised	Applicant's Response
Noise	<p>I am very concerned about the proposed development relating to converting the emergency runway at Gatwick to a full-time use second runway. My main concerns are:</p> <p>1) noise – as a resident of Ifield living close to the airport, having an additional runway would substantially increase the noise around the area, and I haven't seen any substantial proposals relating to noise abatement;</p>	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding noise at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>A new noise insulation scheme will be launched to ensure that significant effects on health and quality of life from aviation noise are avoided. Many interested parties have noted the need to keep windows closed to avoid sleep disturbance and the problems associated with doing this in the warmer summer. The new noise insulation scheme will offer acoustic ventilators to approximately 4,300 homes, to allow residents to close their windows with ventilation if they choose. The applicant has prepared an update note on the ES Appendix 14.9.10: Noise Insulation Scheme [APP-180] at Deadline 2, that clarifies the ventilation that will be offered to address overheating, how the scheme will be implemented, and other details of the products to be provided, and that the sums offered will be subject to review to address inflation every three years. The sums to be offered are under review, including the Home Relocation Assistance Scheme and will be amended in an update to the Noise Insulation Scheme.</p>
Air quality	<p>2) having an additional runway would substantially degrade the air quality around the airport;</p>	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding impacts on air quality at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Traffic and Transport	<p>3) substantially increasing the number of travelers arriving at the airport will impact hugely on an already congested travel network in and around Crawley;</p>	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding impacts on congestion at Section 4.26 of the Relevant Representations Report [REP1-048].</p>
Socio-economics	<p>4) impact of additional workforce – Crawley's local infrastructure is already under pressure, and with the addition of the proposed runway and the mostly low-paid service jobs expected to go with it, the town is not in a position to cope with such an influx;</p> <p>5) the economic benefit – as stated in 4, most of the jobs associated with the runway will be low-paid service sector jobs and will not bring the benefits the developer is claiming</p>	<p>The Applicant has responded thematically to concerns raised by Interested Parties regarding additional workforce and the economic benefits of the Project at Section 4.25 of the Relevant Representations Report [REP1-048].</p>

65 Judith Best

65.1.1. Table 65.1 sets out the Applicant's response to the matters raised in the Written Representation from Judith Best [\[REP1-207\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 65.1 Response to Written Representation from Judith Best

Topic	Matter Raised	Applicant's Response
General	Against yet more flights being allowed if Gatwick win this Application. For those of us now below the already moved flight paths find the number of planes at times(especially at night at times) intolerable. Trying to sleep is a health problem.	The Applicant has responded thematically to concerns raised by Interested Parties regarding noise and impacts on health at Sections 4.22 and 4.17 of the Relevant Representations Report [REP1-048] .

66 Kent County Council

66.1.1. Table 51.1 sets out the Applicant's response to the matters raised in the Written Representation from Kent County Council [\[REP1-180\]](#). Where relevant, the Applicant has provided direction to the relevant sections of **The Applicant's Response to Local Impact Reports** (Doc Ref. 10.15).

Topic	Matter Raised	Applicant's Response
Needs Case	<p>The Authority's present position is that, based on the evidence so far presented, the level of increase in capacity attainable from the NRP has been overstated by GAL and that, as a consequence, levels of usage – the demand forecasts – have been overstated. It is likely that achieving the claimed throughput in peak periods may require different use of the departure routes resulting in potentially greater environmental effects.</p> <p>Furthermore, the methodology by which the demand forecasts have been derived is not considered robust, even if the underpinning assumptions as to the capacity attainable with two runways in use were correct. GAL's demand forecasts have largely been derived using a 'bottom up' approach and are based on the capacity that is assumed to be available with and without the NRP. This relies on a judgemental assessment of the services that the airlines might operate if the capacity was available. Instead, a 'top-down' econometric approach would involve modelling the level of future demand within the wider catchment area served by the Airport, and then assessing the share that Gatwick might attain of the overall market demand. Section 2 of Annex 6 to Appendix 4.3.1 to the ES (APP-075) simply states assumptions as to the additional services in each market that the Airport might be able to attract on the basis that there is "limited growth opportunity at other London airports".</p>	The Applicant has responded to the local authorities on the Principle of Development at Appendix A to this document (Doc Ref. 10.14).

Topic	Matter Raised	Applicant's Response
	<p>GAL's approach to calculating demand forecasts is purely aspirational. The 'bottom up' approach used by the Applicant does not provide sufficient evidence to support the claimed increase in throughput, its composition in terms of routes and the future airline fleet of aircraft, or to test the implications of more capacity at the other airports. It is an exercise in demonstrating how the capacity provided by the NRP might be used but it does not provide evidence that there is a realistic prospect of it being so used. This applies to both the Base and NRP Cases.</p> <p>If GAL's assumptions are correct, it is unclear why in the Base Case, given constraint in capacity at Heathrow, some additional services have not already been attracted. The extent to which this is linked to current congestion issues is not clear. Consequently, it is not evident that what is planned to improve the attractiveness of the Airport is sufficient to justify the assumption that additional flights in each market could be attracted with the existing infrastructure to deliver a forecast throughput in the Base Case of up to 67 mppa. For this reason, it is considered that the assumption that the Airport can attain 67 mppa, up from 46.6 mppa in 2019, is not realistic and that a Base Case capacity in the range 50-55 mppa is more likely.</p> <p>Although some top-down benchmarking of the demand forecasts has been undertaken by reference to the Department for Transport's (DfT) national aviation forecasts, it is not entirely clear the extent to which this benchmarking has considered the effect of additional capacity at other airports in driving overall levels of demand. Therefore, it may be possible that the forecasts overstate the actual demand that would be available to Gatwick.</p> <p>On the basis that the demand projections for the Base Case with the existing runway are likely to have been overstated, possibly even more so than those with the NRP given current levels of airfield congestion and the views of airlines, it seems likely that the differences in the environmental impacts with and without development may have been understated.</p> <p>In particular, the consequence of this overstatement of demand is that the limit size of the noise contour in the Noise Envelope will have been set too large and so provide no effective control or incentive to reduce noise levels at the Airport given that it is proposed to be set by reference to the initial noise levels, with no reduction until 2038. This is especially so given that it is proposed that the Noise Envelope be set by reference to a slower fleet transition case that</p>	

Topic	Matter Raised	Applicant's Response
	<p>has not been updated since the Preliminary Environmental Information Report (PEIR), despite significant orders of new generation aircraft by easyJet and other airlines that would mean that the core case fleet assumptions appear much more realistic.</p> <p>A consequence of the approach to the demand forecasts is that the wider economic benefits of the proposed development, as set out in the Oxera Report appended to the Needs Case (APP-251) have been overstated due to the failure to adequately distinguish the demand that could be met at Gatwick from the demand which could only be met at Heathrow and the economic value that is specific to operations at Heathrow. There are also concerns that the methodology by which the wider catalytic impacts in the local area has been assessed (Appendix 17.9.2 to the ES [APP-200]) is not robust and little reliance can be placed on this assessment.</p> <p>Overall, this means that there can be little confidence that the decision maker can rely on the assessment of effects to judge whether the benefits outweigh the harms.</p>	
Noise	<p>One of KCC's main concerns regarding the proposed Northern Runway Project is the noise impacts of increased flights on communities on the ground. Gatwick Airport Limited's proposals assume a growing fleet of quieter aircraft will be achieved over the timescales of the Project. However, in order for impacted communities on the ground to be appropriately mitigated it is imperative the proposed Noise Insulation Scheme is generous, robust and fit for purpose.</p> <p>Information should be provided around which schools would be included within the Schools Insulation Scheme, along with details of other noise sensitive receptors.</p> <p>Furthermore, clarity is needed as to how the Noise Insulation Scheme will be reviewed and revised following implementation of the Future Airspace Strategy Implementation South (FASI-S) Airspace Change Process which will result in a redesign of the Gatwick flight paths.</p>	<p>The Applicant has responded to Kent County Council's detailed concerns on noise at Section 5.3 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	<p>KCC's Local Impact Report has identified a number of adverse impacts in regard to air noise and the following additional information is requested from the Applicant:</p> <p>Noise Impact A of KCC's Local Impact Report refers to the Applicant's assessment of overflight. It is not currently possible to determine the true extent of the anticipated impact of overflight as the number of overflight events are not provided, apart from landscape assessment locations chosen by the Applicant. However, it is clear from the figures provided that areas within West Kent would experience a worsening of overflight. Further detail is needed for local authorities to understand the true extent of overflight impacts on communities on the ground.</p> <p>In addition, the Applicant's application provides no clarity on how the Northern Runway Project will impact arriving aircraft at Gatwick. Further clarification is required from the Applicant as to the breakdown of proposed arrivals and departures on the main runway with the Northern Runway in routine use for departures only, and whether any increase in the frequency of arrivals on the main runway has been assessed. Without this assessment, the true extent of the impacts felt by communities on the ground will not be properly assessed.</p> <p>Noise Impact B – KCC appreciates it is difficult to predict the need for aircraft to go-around when arriving into Gatwick. However, it should be noted that any increase in the number of air traffic movements at the airport will inevitably result in an increased chance of go-arounds. As it is not possible to estimate the number of additional go-arounds the Northern Runway Project may generate, it is not possible to understand the increased impact this will have on communities on the ground. KCC would encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.</p> <p>Noise Impact C – The Applicant has used annual noise contours to determine if extra capacity would affect noise levels during periods outside of the 92-day summer period. It is hard to draw any meaningful conclusion from the analysis of annual contours. Paragraph 14.9.139 [APP-039] identifies that, in 2032, increases in Lden contours are the same as the increase in Laeq,16h noise contours; however, Lnight contours increase by 11-12%, which is larger than the increase in LAeq,8h contours. This suggests that there is a larger increase in annual night-time movements than in the 92-day summer period.</p>	

Topic	Matter Raised	Applicant's Response
	<p>Clarification should be provided on seasonality during the annual night-time period and whether a larger increase in contour size warrants any identification of significant effects. Furthermore, it would be helpful to understand if there are any seasonal variations in movements during other assessment years.</p> <p>Noise Impact D – It has not been possible to determine the impact of the proposals on Tunbridge Wells district due to the Applicant's application failing to provide any information about aircraft noise in this area. KCC is already well aware of the adverse impacts current operations at Gatwick have on communities in Tunbridge Wells, and it is imperative any potential increase is fully assessed and mitigated where possible.</p> <p>KCC requests for the Applicant to undertake further assessment to illustrate the impact of noise in Tunbridge Wells. Figure 14.9.31 of APP-065 demonstrates how Tunbridge Wells will experience a significant level of overflight in 2032, however no further information is provided to enable KCC to meaningfully assess the level of impact. Furthermore, during westerly operations Tunbridge Wells is more so affected by arrivals and no information has been provided in GAL's application as the associated noise impacts with the Northern Runway in routine operation.</p> <p>Noise Impact E – Whilst Noise Impact E of KCC's Local Impact Report concludes that noise impacts associated with the NRP will have a neutral impact on Sevenoaks district, it is imperative that discussion on the impact of increases in aircraft movements takes place between KCC and the Applicant to put increases into context and determine if a likely significant effect should be identified.</p> <p>Furthermore, similar to Tunbridge Wells, Sevenoaks is more so affected by arrivals during westerly operations and no information has been provided in GAL's application as to the associated noise impacts with the Northern Runway in routine operation. Further information on arrival impacts is requested from the Applicant.</p> <p>Noise Impact F – For the one community representative location in Sevenoaks, identified by the Applicant, there was deemed to be a neutral impact. The location chosen was Chiddingstone Church of England Church.</p>	

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	<p>While the increase in noise at Chiddingstone Church was deemed minimal, KCC would request the Applicant to undertake further assessment of additional community representative locations. Locations should be identified in other areas of Sevenoaks, such as Penshurst and Edenbridge, where adverse noise impacts are already experienced by existing Gatwick operations, and locations identified within Tunbridge Wells which has so far not yet been subject to any thorough noise assessment.</p> <p>Noise Impact G – Noise Impact G of KCC's Local Impact Report highlighted that the noise envelope put forward by the Applicant does not fulfil the purpose for which it is intended and nor does it fulfil the majority of characteristics stated in CAP 1129. KCC requests that the Applicant undertakes further work on the noise envelope, in consultation with local authorities, to develop a robust noise envelope.</p> <p>Noise Impact H – KCC's Local Impact Report identified a negative impact on Hever. The Castle in particular is anticipated to experience a 20% increase in daily overflights. Further clarification is required from the Applicant as to whether this increase includes any additional arrivals that may use the main runway when the Northern Runway is being routinely used.</p> <p>Hever Castle is a popular heritage asset and standard noise mitigation, such as insulation schemes, will not be appropriate. The level of overflight by existing operations at Gatwick already disturbs the tranquillity of the area and so any additional overflight should not be allowed.</p> <p>Noise Impact I – The Applicant's assessment deems a minor increase in the number of overflights in Knole compared to the 2019 Baseline. Consideration needs to be given to the fact Knole Park in particular is a tourist attraction within the designated Kent Downs National Landscape and so overflight of this area should be avoided as much as possible. KCC sees the potential for this to be addressed through the airspace change process and does not currently anticipate for any further mitigation to be required through the DCO.</p> <p>Noise Impact J – Noise Impact J of KCC's Local Impact Report highlighted the recent change to legislation regarding National Landscapes. This change obliges decision makers to "seek to further the purposes", as opposed to "have regard to". Where possible the NRP should seek to further the purposes of the National Landscapes within the wider area, including those which aircraft</p>	

Topic	Matter Raised	Applicant's Response
	<p>overfly. Whilst it may be more appropriate for the airspace change process to address these matters, consideration needs to be given to the impact this project will have on the tranquillity of National Landscapes and how the Applicant will “seek to further the purposes” of the National Landscape.</p>	
Surface Transport	<p>Surface Transport Impact A – KCC requests sight of the Local Model Validation Report (LMVR) for the Project, so that the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed, where an impact has been identified.</p> <p>KCC notes in Transport Assessment [AS-079] Table 12.5.4 that National Highways recognizes that “it would appear disproportionate to expect the developer of Gatwick NRP to redesign the entire interchange to cope with a relatively small increase in traffic figures over those which would naturally occur”. Further consultation with National Highways is apparently ongoing, yet KCC is not aware of any plans to include this intersection in a future Road Investment Strategy (RIS) pipeline. As this junction is forecast to carry around half the road trips associated with the airport – according to Transport Assessment [AS-079] Diagram 12.3.2 – it will be important to include it in the monitoring of the Surface Access Commitments [APP-090] and work with National Highways on any required mitigation.</p> <p>With regard to the risk that the 55% public transport mode share targets are too ambitious – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – we request a model sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, which Diagram 6.2.4 of the Transport Assessment [AS-079] indicates has been fairly consistent since 2012. KCC would appreciate receiving model results in the form of shape files for such an assessment, including traffic speeds and volume / capacity ratios, so we can better appreciate the effects on the road network.</p> <p>Surface Transport Impact B – Under Surface Transport Impact A, KCC has requested a model sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, which we will use to confirm our initial assessment that the Project provides a neutral impact on the local road network from the perspective of travellers from Kent.</p>	<p>The Applicant has responded to Kent County Council’s detailed concerns on surface transport at Section 5.4 of The Applicant’s Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	<p>Surface Transport Impact C – KCC acknowledges that mitigation of our concerns about potential pressure on the two London transfer stations that support Kent trips to Gatwick would be the responsibility of Network Rail and the operators. We consult regularly with Network Rail and understand there has been a recent route study on Gatwick to Tonbridge services via Redhill, which could alleviate such pressure.</p> <p>With regard to the risk that the 55% public transport mode share targets are too ambitious – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – we request a second model sensitivity test that maintains the public transport mode share for air passenger coaches at the same levels as those prior to the pandemic but covers the achievement of 55% public transport mode share by increases in rail patronage.</p> <p>Surface Transport Impact D – KCC notes the volume of work done and reported in Transport Assessment [AS-079] Chapter 10 to confirm the rail platform and concourse facilities at Gatwick will be able to accommodate the forecast demand. KCC cannot find a similar analysis regarding kerb space facilities for coaches to accommodate the boarding & alighting of passengers with luggage (with significant associated dwell times).</p> <p>In the absence of this information, it is not possible to understand whether the proposed increases in coach travel supporting the 55% public transport target – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – present a positive or negative impact to Kent travellers.</p> <p>We request further information on existing and proposed kerb space provision for air passenger coaches at the two terminals, to better understand whether the forecast increases in supply can be accommodated.</p> <p>Surface Transport Impact E – KCC requests the Applicant to confirm the full list of new and enhanced coach services to Gatwick, which appear to differ in Transport Assessment [AS-079] Tables 7.1.1 and 11.3.2 and Surface Access Commitments [APP-090] Table 1, which outlines the Applicant's funding commitments for coach services. KCC appreciates the Applicant's commitment to "provide reasonable financial support" for the coach services identified in Table 1 "for a minimum of five years" but is concerned about what happens after, and its effect on the 55% mode share targets for public transport by year 2047. Furthermore, we have concerns around what constitutes "reasonable</p>	

Topic	Matter Raised	Applicant's Response
	<p>financial support". KCC's experience is that coach services between Kent and Gatwick do not work without subsidy. A relevant example of this is the 2015 Kent to Gatwick direct service introduced commercially by National Express. This was subsequently withdrawn due to lack of use approximately 18 months later. The same is true of a more recent direct coach offering to Stansted. The forecast fifteen-fold increase in air passenger coach services proposed between Gatwick and Kent should perhaps be reviewed in this historical context. We also ask the Applicant to provide further information on what they deem "reasonable financial support" and to work with KCC to develop the proposals for coach services to and from Kent to ensure they are successful.</p> <p>As the enhanced Romford-Upminster-Dartford-Gatwick coach service will initially suffer from existing and worsening congestion at the Dartford Crossing, a simple mitigation would be to provide a dedicated coach service between Dartford and Gatwick (or inclusion of Dartford in the proposed Bexley-Footscray-Gatwick service) until the Lower Thames Crossing is operational.</p> <p>The proposed new royal Tunbridge Wells-East Grinstead-Gatwick coach service is assumed to be routed via the A264; a narrow, rural, single carriageway road which KCC deems unsuitable for such a service. Figure 1 (see REP1-180) illustrates how Google Directions shows the route between Royal Tunbridge Wells and Gatwick to be faster via the A21, M25 and M23 – a route which could also take in Tonbridge, a catchment of comparable population to Royal Tunbridge Wells. East Grinstead is already served by the Uckfield-East Grinstead-Gatwick coach service and local buses.</p>	
Climate Change	<p>Climate Change Impact A – Climate Change Impact A of KCC's Local Impact Report outlined our concerns around Gatwick Airport Limited's compliance with the recommendations of the Climate Change Committee (CCC). The Applicant's application focuses on how the proposals align with the Jet Zero Strategy, but KCC seeks further clarity from the Applicant as to how they are complying with the Climate Change Committee's recommendations. Without this there cannot be the confidence that this Project will not jeopardise the UK's ability to meet the legally binding ambitions of the Paris Agreement.</p> <p>Climate Change Impact B – Climate Change Impact B also highlighted our concerns around the increase in aviation emissions as a result of the</p>	<p>The Applicant has responded to Kent County Council's detailed concerns on greenhouse gases at Section 5.5 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	<p>anticipated increase in air traffic movements. Again, KCC seeks clarification from the Applicant on how they propose to align with the Paris Agreement given the large volume of extra emissions from this Project and the unrealistic prospect of sequestering these. Furthermore, it would be helpful to understand if the impact of the Northern Runway proposals on the Sixth Carbon Budget has been calculated.</p> <p>Climate Change Impact C – KCC's Local Impact Report highlighted the cost to society of increased greenhouse gas emissions. Before it can be determined whether sufficient mitigation measures are proposed by the Applicant, clarification must first be provided by Gatwick Airport Limited as to whether the impact on society of extra emissions generated from the Project has been calculated.</p>	
Heritage Conservation	<p>Heritage Conservation Impact A – In order to understand the extent of the impact of increased overflight on Historic Buildings in West Kent, KCC would recommend the Applicant undertakes a Historic Environment Assessment with a suitable impact assessment. It is evident from the Noise and Vibration Chapter of the Environmental Statement that historic buildings such as Hever Castle will be adversely impacted. To ensure the assessment is robust, the study area should be agreed with KCC Heritage before the assessment is completed.</p> <p>Heritage Conservation Impact B – Whilst Heritage Conservation Impact B of KCC's Local Impact Report concluded a neutral impact, this result cannot be confirmed until a Historic Environment Assessment of West Kent is undertaken.</p> <p>Heritage Conservation Impact C – In addition, a Historic Environment Assessment of West Kent would also assist in determining the extent to which the Northern Runway proposals will impact on historic landscapes in the area and ensure any appropriate mitigation is secured through the DCO process.</p>	The Applicant has responded to Kent County Council's detailed concerns on heritage at Section 5.6 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
Socio-Economics	Socio-economic Impact A – KCC recognizes the economic benefits that growth at the Airport could bring to Kent. It can be argued that the adverse impacts of current operations outweigh the benefits. However, the NRP has the potential to bring greater economic prosperity to Kent and the wider South East in terms of business and tourism. The Applicant should ensure as much as possible that the benefits of the Project are shared equally across the whole	The Applicant has responded to Kent County Council's detailed concerns on socio-economics at Section 5.7 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).

Topic	Matter Raised	Applicant's Response
	<p>six authorities' area, working with local authorities where necessary to achieve this.</p> <p>Socio-economic Impact B – Whilst Socio-economic Impact B of KCC's Local Impact Report identified the benefits that could be achieved through successful delivery of the Applicant's Employment, Skills and Business Strategy (ESBS), KCC would argue the Implementation Plan would be better secured through the DCO as opposed to a separate S106 Agreement. The reasoning for this is because the ambitions of the ESBS stretch further than the geographical area of which a S106 Agreement would cover. In addition, it may be the case that not all authorities will be party to the S106 Agreement. Therefore, commitments to deliver on such a strategy should be secured through the DCO either in the form of a Requirement, or a control document such as a Stakeholder Actions and Commitments Register, as opposed to the S106 Agreement.</p>	

67 Laura Manston

67.1.1. Table 67.1 sets out the Applicant's response to the matters raised in the Written Representation from Laura Manston [\[REP1-209\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 67.1 Response to Written Representation from Laura Manston

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	The expansion of an airport during a climate emergency is outrageous. We need to fly less, not more.	The Applicant has responded thematically to concerns raised by Interested Parties regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .

68 Lawrence Leather

68.1.1. Table 68.1 sets out the Applicant's response to the matters raised in the Written Representation from Lawrence Leather [\[REP1-210\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 68.1 Response to Written Representation from Lawrence Leather

Topic	Matter Raised	Applicant's Response
Wildlife, Climate Change, and Greenhouse Gases	<p>I help manage an area of woodland south of Gatwick Airport, the disturbance of the existing infrastructure to wildlife is already very apparent and the idea of more flights is deeply concerning.</p> <p>As well as the local impacts, the impact on the global climate is terrifying and we are watching as weather systems become more intense and chaotic everyday across the globe due to our huge emissions. 80% of the global population has never been on a flight – why must this countries selfish entitlement come at such a massive and unjust cost.</p> <p>Thank you for holding space for consultation, this proposal really is monumental and if it goes ahead will push our beautiful planet and its precious wildlife one step closer to extinction</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding the noise impacts on wildlife and habitats at Section 4.22 and greenhouse gas emissions at Section 4.16 of the Relevant Representations Report [REP1-048].</p>

69 Lewes District Council

69.1.1. Table 69.1 sets out the Applicant's response to the matters raised in the Written Representation from Lewes District Council [\[REP1-081\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 69.1 Response to Written Representation from Lewes District Council

Topic	Matter Raised	Applicant's Response
Carbon and Greenhouse Emissions	<p>We recently included within our new Corporate Plan a restatement of our intention to be a net zero carbon and climate resilient council and district by 2030. Tackling the climate crisis and nature emergencies is central to all our activities. A second runway will produce a significant amount of carbon and greenhouse emissions at a time of commitment to their reduction. Airport expansion on the scale proposed would substantially increase the CO2 emissions and other climate effects associated with Gatwick's operations and more aircraft movements . These include air quality impacts as well as noise pollution affecting the tranquility of the district's countryside within and outside the South Downs National Park. We therefore cannot support the expansion as proposed.</p>	<p>The Applicant has responded to the comments raised by Lewes District Council in relation to greenhouse gases at Section 3.52 of the Relevant Representations Report [REP1-048].</p>
Socio-Economics: Economic Impacts	<p>It is extremely challenging to adequately digest all of the relevant documentation submitted in relation to economic impacts. There would appear to be widely separate, inconsistent and debated economic arguments and uncertainties. For Lewes District this proposal is inextricably linked to connectivity and transport infrastructure. For example will employment</p>	<p>The Applicant has responded thematically to concerns raised by Lewes District Council regarding employment opportunities and impact on housing and infrastructure of the Project at Section 4.25 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<p>opportunities expand for our residents or will this place just more stress upon house prices and infrastructure?</p>	<p>Employment growth due to the project can be accommodated alongside other employment growth within the forecast housing growth as demonstrated in Section 4 of Environmental Statement Appendix 17.9.3: Appendix of Population and Housing Effects [APP-201].</p>
<p>Air Quality and Traffic Impacts</p>	<p>Any expansion of Gatwick is very likely to have a detrimental impact on traffic and associated air quality issues in our district. An increase from 46 million passengers in 2019 to 80 million passengers per annum (over 70% growth) without there being scope to increase rail capacity will inevitably increase congestion impacting the whole area. We would question whether the proposed expansion conforms with TFSE strategic plan aspirations. We would further ask that more work is undertaken on the overall impacts upon the whole of the south-east.</p>	<p>The Applicant has addressed points relating to the increase in passenger numbers, and the basis for the assessment, in The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065].</p> <p>The Applicant has responded thematically to comments made within relevant representations regarding traffic impacts, at Section 4.26 of its Relevant Representations Report [REP1-048].</p>
<p>Surface Transport: Rail Capacity</p>	<p>Whilst the airport is accessible by rail from Lewes District, train services are still limited to approximately hourly on the line between Wivelsfield and Lewes serving Plumpton and Cooksbridge. These same services also crucially connect the district to London and are important for commuting residents and the district's economy. The Council has aspirations for improved rail services related to existing infrastructure pressures and local housing growth. We seek assurances that airport expansion will not result in a shift in train services using the Gatwick – London line away from serving Lewes District to services focused on airport users. It is unclear what measures would be considered for increasing rail capacity that do not have knock-on effects on existing access to London by Lewes residents in terms of very challenged levels of train services.</p> <p>It is understood that limited capacity for growth on the London - Gatwick – Brighton line is a fundamental issue for future growth and prosperity in the wider region. The relationship between Gatwick expansion and the potential re-opening of the railway line between Uckfield and Lewes should be explored. This would deliver strategic and widespread benefits in terms of alternative London – Brighton services alleviating strain on the London – Gatwick – Brighton line. It is understood that TfSE has aspirations to reinstate the former Uckfield to Lewes railway line to increase the resilience of wider rail connectivity between the South Coast and London. The emerging new Lewes Local Plan proposes to continue to oppose development that would significantly prejudice the reinstatement of the Uckfield to Lewes railway line.</p>	<p>A comprehensive assessment has been undertaken for rail capacity which is set out in Chapter 9 of Transport Assessment [AS-079] and in ES Chapter 12 [AS-076]. The assessment shows that the greatest increases in rail patronage resulting from the Project would occur in the counter-peak directions where services are less busy; that no significant effects are expected in relation to crowding on rail services as a result of the Project; that capacity would remain available and therefore that no mitigation is required.</p> <p>The Applicant will continue to work with Network Rail and Train Operators on potential future improvements.</p>

70 Lewes District Green Party

70.1.1. Table 70.1 sets out the Applicant’s response to the matters raised in the Written Representation from Lewes District Green Party [REP1-216]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [REP1-048].

Table 70.1 Response to Written Representation from Lewes District Green Party

Topic	Matter Raised	Applicant’s Response
Greenhouse Gases	<p>The Government’s advisory body for climate change, the Climate Change Committee (CCC), stated, as a priority, in their Progress Report, June 2023: R2023-037:</p> <p><i>“No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects. A framework should be developed by DfT in cooperation with the Welsh, Scottish and Northern Irish Governments over the next 12 months and should be operational by the end of 2024. After a framework is developed, there should be no net airport expansion unless the carbon-intensity of aviation is outperforming the Government’s emissions reduction pathway and can accommodate the additional demand”.</i></p> <p>This recommendation was echoed by the Environmental Audit Committee (EAC) ‘Net zero and the UK aviation sector – Third Report of Session 2023–24’:</p> <p><i>“We recommend that the Government sustain and enhance its engagement with the aviation industry on the delivery of operational efficiencies from current and future fleets of aircraft operating through the UK, to maintain the ambition to secure 2% year-on-year CO2 emissions reductions from fuel and operational efficiencies. The delivery of these reductions must be rigorously monitored against an established baseline: should the rate of progress in reductions fall behind 2%, the potential contribution of system efficiencies to meeting the 2050 net zero target must be urgently reassessed”.</i></p> <p>Given that the Government has chosen to ignore both these recommendations, and that neither the capacity management framework proposed by the CCC nor the rigorous monitoring of reductions ‘against an established baseline’ proposed by the EAC are in place, it is clear to us that the proposed expansion of Gatwick Airport will inevitably be incompatible with the legal requirement (passed into law in 2019) to attain net zero emissions by 2050.</p>	<p>It is for government to respond, annually, to the reports of the CCC. In its most recent report (2023), the Government Response included the following:</p> <p><i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK’s overall 2050 net zero target.”</i></p> <p>The NRP application accords with government policy. As set out in the Government’s Response, aviation expansion (which explicitly includes the growth assumed as part of the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	<p>The Aviation Environment Federation (AEF) points out on its website at 'Challenging Airport Expansion' that contrary to the CCC's advice "the Government's 'Jet Zero Strategy One Year On' published in the summer 2023, forecasts passenger increases of 52% above 2018 levels, more than twice the 25% growth allowed for in the Climate Change Committee's net zero modeling". We agree with the AEF's view that "this is a high-risk strategy that puts emissions targets at risk."</p>	Please see response above.
Greenhouse Gases	<p>It is also clear that the mitigations suggested by the airline industry to offset emissions and/or to rely on future Negative Emissions Technologies (NETs) are, unfortunately, wishful thinking. Offsetting has so far failed to adequately compensate for emissions, and NETs are not yet available to be deployed either at the scale required, or within the necessary timeline. Unfortunately, unlike the bold claims of airlines, 'flying green' does not (yet) exist.</p>	<p>The Applicant has responded thematically to comments made within relevant representations on the Jet Zero position on uncertainty around future technological development at Section 4.16 of the Relevant Representations Report [REP1-048].</p>
Air Quality	<p>Gatwick Airport currently continues to breach air quality limits of Nox. Research has shown that peak landing and take-off times produce peak distribution of particles. With a second runway in operation, Gatwick proposes to introduce more flights throughout the daily period, thus peak distribution of particles will inevitably increase exponentially.</p> <p>According to the 'Campaign Against Gatwick Noise and Emissions' (CAGNE)'s updated 'What about our Air Quality?' report, it is anticipated that 'the concentration of particles with a 2-runway airport would increase by 63% to 153,220 particles/cm³ throughout the day' (Imperial College research study). There would, of course, be further increases caused by service vehicles, airside vehicles, taxiing, and passengers accessing the new Gatwick rail station.</p> <p>Gatwick has stated that it will 'work with' local authorities to monitor and mitigate air quality, but no details are provided about how this would be undertaken. Furthermore, Gatwick Airport is not interested in addressing the additional, further decline in air quality, due to the inevitable increase in vehicle traffic to and from the airport and its newly-built amenities. Nor does it appear to take into account the concentration of particles, especially the ultrafine particles, which will inevitably result from the construction, as well as the operation, of the new runway.</p>	<p>The Applicant has responded thematically at Section 4.3 of its Relevant Representations Report [REP1-048]. Section 4.3 addresses the concerns raised, including concerns that air quality will worsen as a result of increasing pollution from airport, road traffic and construction vehicles. Section 4.3 additionally addresses concerns regarding monitoring, mitigation and the assessment of ultrafine particles.</p> <p>In order to manage future emissions, measures and monitoring commitments will be secured via the draft Development Consent Order (Doc Ref. 2.1) and updated draft Section 106 agreement [REP2-004]</p>

Topic	Matter Raised	Applicant's Response
Noise	<p>Many residents represented by LDC councilors live directly under Gatwick flight paths (e.g. the rural village of Ringmer). The increased air traffic and thereby noise pollution arising from the additional runway would be unacceptable to residents. There are well-known detrimental impacts on human health and wellbeing (e.g. sleep quality) from the stress of noise pollution.</p>	<p>The Applicant has responded to concerns raised by Lewes District Council regarding aircraft noise at Section 3.52 of the Relevant Representations Report [REP1-048].</p> <p>ES Chapter 14: Noise and Vibration [APP-039] sets out the primary analysis of noise on local communities and discussion of appropriate mitigation.</p> <p>ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Noise Exposure.</p>
Noise	<p>An expanded and altered noise monitoring and insulation program would need to be rolled out, each one funded by the airport in perpetuity, with results being made publicly available, and noise monitoring locations would need to be expanded.</p> <p>We strongly object to 'mean noise' being used as an appropriate measure. Currently, noise peaks occur around every 3 minutes. These would occur far more frequently with 2 runways in operation. The impact of repeated peaks on our residents' health and mental wellbeing is already significant and noise pollution from additional flights would only make this worse. At the least, we would require full adherence to the 2014 offer of 'no night flights' between the hours of 23.30 and 6.30</p>	<p>An expanded noise insulation programme is proposed with the project, see ES Appendix 14.9.10 Noise Insulation Scheme [APP-180], although it does not extend as far as the LDC area. Gatwick Airport already has an extensive noise monitoring system as described in ES Chapter 14: Noise and Vibration [APP-039] covering the current flight paths, and because there are no new flight paths proposed there will not necessarily be a need for additional noise monitoring locations, although the airport keeps this under review on an ongoing basis. The noise envelope process proposed with the Project also requires annual forecasting and reporting of noise levels.</p> <p>A full range of noise metrics is used in the ES. The ES provides an assessment of the health impacts of noise from the Project, see ES Chapter 18: Health and Wellbeing [APP-043]. See also the thematic response provided in Section 4.22 of the Relevant Representations Report [REP1-048] titled '<i>Concern about the impact of increased noise on health and well-being, with some respondents concerned about the detrimental impact of noise on quality of sleep</i>'.</p> <p>The noise impact of this Project will be far smaller than the second runway proposal referred to in the context of a ban on night flights. The assessment assumes the Night Restrictions imposed by the DfT will continue to limit aircraft movements and noise in the 2330 to 0600 hours period, so that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work as currently is the case. As a result, the area of the Leq 45dB 8 hr night LOAEL noise contour with the Project will be smaller than in the 2019 baseline.</p>
Surface transport	<p>East Sussex County Council (ESCC) has cited multiple points of concern in relation to surface transport in their 'Relevant Representation' (26.10.2023) to the Planning Inspectorate and we, being within the ESCC boundary, find these</p>	<p>As set out in Chapter 2 of the Relevant Representations Report [REP1-048], ESCC is a stakeholder with which the Applicant has produced a Statement of Common Ground (SoCG) Statement of Common Ground between Gatwick</p>

Topic	Matter Raised	Applicant's Response
	are relevant to us. They include the need for Gatwick Airport to address proper delivery of necessary supporting travel infrastructure in advance of the northern runway being in full operation.	<p>Airport Limited and East Sussex County Council [REP1-039]. The Applicant will continue to engage with ESCC and provide further updates to the SoCG in due course.</p> <p>The Applicant is committing to achieving specified mode shares within three years of dual runway operations commencing, as set out in ES Appendix 5.4.1: Surface Access Commitments [APP-090]. The Applicant will put transport interventions in place at the appropriate time to ensure that those mode share commitments are achieved. ES Chapter 12: Traffic and Transport [AS-076] assesses the effects of the Project in both 2029 and 2032 and concludes that in 2029, prior to completion of the Project highway works, there would be no significant adverse effects and no mitigation is required. The completion of the highway works by 2032 prevents unacceptable highway conditions arising beyond that date with the Project in place.</p>
Surface Transport: Mode share commitments	That in the 'Mode Share Commitments' (set out in the Surface Access Commitments) there are not sufficiently ambitious mitigation proposals, especially for passenger travel, to encourage a substantial modal shift towards sustainable travel to and from an expanded airport, i.e. bus priority measures to deliver journey time savings.	<p>The mode share commitments within ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] represent the position The Applicant is committing to achieve, based on the modelling of mode choice and transport network operation. It sets the committed mode shares and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport [AS-076] and in the Transport Assessment [AS-079] are delivered.</p> <p>The SAC sets further aspirations which acknowledge that there may be further opportunities to enhance public transport services. In parallel the Applicant will maintain the operation of the Sustainable Transport Fund to support measures that will help to encourage further shift to sustainable travel modes.</p>

71 Malcolm David Macfarlane

71.1.1. Table 71.1 sets out the Applicant's response to the matters raised in the Written Representation from Malcolm David Macfarlane [REP1-218]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 71.1 Response to Written Representation from Malcolm David Macfarlane

Topic	Matter Raised	Applicant's Response
Air Quality and Greenhouse Gases	We have too much travel by air already in the south east polluting the air and the environment with noise and fumes	The Applicant has responded thematically to comments made within relevant representations regarding air quality and greenhouse gas emissions at Sections 4.3 and 4.16, respectively, of the Relevant Representations Report [REP1-048].

Topic	Matter Raised	Applicant's Response
Traffic, and Socio-Economics	The basic infrastructure in this area is already completely creaking even without a second runway. The road system in the area around Gatwick and the surrounding towns are already incapable of coping with the huge influx of people from all the residential developments built in the area. The hospitals and NHS doctor's surgeries are at breaking point with too much demand on them. The utilities are stretched beyond a reasonable capacity.	<p>The Applicant has responded thematically to comments made within relevant representations regarding impacts on traffic and hospitals at Sections 4.25 and 4.26 of the Relevant Representations Report [REP1-048].</p> <p>Comprehensive strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project as set out in Chapters 12 and 13 of the Transport Assessment [AS-079]. Based on the modelling work and the assessment of environmental effects, ES Chapter 12: Traffic and Transport [AS-076] identifies that the Project would not result in significant adverse effects in relation to traffic and transport requiring mitigation.</p> <p>Section 17 of the ES Chapter 17: Socio-Economic [APP-042] identifies that there will be no significant impacts on community facilities including hospitals and GP surgeries.</p>
Agricultural Land Use and Recreation	Yet more of the green open space in this glorious part of England will be lost to unnecessary new development.	<p>The Applicant responded thematically to comments made within relevant representations regarding impacts on open space, at Section 4.2 of the Relevant Representations Report [REP1-048].</p> <p>The NRP's highway improvement works would affect areas of open space at Riverside Garden Park and Church Meadows. These impacts have been reduced as far as possible within the development of the Project design and, where open space land is permanently required for the Project, replacement open space will be provided. This replacement open space will provide more quality open space than is currently available, and of a greater quantum than the existing open space to be lost by the Project. The location of the open space permanently affected and the replacement land proposed is identified on Figure 19.8.1 of ES Agricultural Land Use and Recreation Figures [APP-058].</p>

72 Marathon Asset Management MCAP Global Finance (UK) LLP

72.1.1. Table 72.1 sets out the Applicant's response to the matters raised in the Written Representation from Marathon Asset Management [REP1-222]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 72.1 Response to Written Representation from Marathon Asset Management

Topic	Matter Raised	Applicant's Response
Compulsory Acquisition	<p>Three principal concerns in respect of the proposed CPO land take under the DCO:</p> <ul style="list-style-type: none"> • The permanent land take as currently proposed is excessive and not clearly justified; • The sole access to the Property is proposed for permanent acquisition. Suitable alternative access must be identified in advance of any closure, but this is not yet secured through the Order; and • There is a lack of clarity over the need to compulsorily acquire rights. 	<p>In respect of permanent land take, the Applicant has provided further information to Marathon Asset Management via correspondence dated 14th March 2024 and the matter was discussed at a face to face meeting on 27th March 2024. Justification for the land required both on a Permanent and Temporary basis can be found in the Statement of Reasons [AS-008] with the land forming a part of the surface access Highway Improvement Works (Work No. 37).</p> <p>In respect of the specific mitigation measures for the sole access, mitigation options were put to Marathon Asset Management in correspondence dated 14th March 2024. Those mitigation options were then discussed at a face to face meeting with Marathon Asset Management on 27th March 2024. Marathon Asset Management expressed a preference for one of the options proposed. The option being worked on by the Applicant is to build a temporary access north of the existing entrance to be used during any closure of the permanent access point. The Applicant will now work up an outline design for this preferred option, for inclusion in a negotiated agreement.</p> <p>In respect of the need to compulsorily acquire rights, the matter was explained to Marathon Asset Management in correspondence dated 14th March 2024 and discussed at a face to face meeting on the 27th March 2024 and confirmed the need for both the permanent and temporary land acquisition to undertake the surface access Highway Improvement Works (Work No. 37), which includes the construction of both the active travel path, and Longbridge roundabout and highway expansion works , in addition there is a requirement for permanent rights for the purposes of accessing and maintaining utility assets. The Applicant has, during negotiations, agreed to use all reasonable endeavours to reduce land acquisition where possible.</p> <p>The Applicant will continue to engage with Marathon Asset Management and seek to reach a negotiated agreement.</p>
Surface Transport: Impact on 'Hoppa' Bus Service During Construction	The Hoppa bus service is an essential element of the 'Park, Stay and Go' package provided by the Hotel, which makes up more than 40% of the revenue	At a face to face meeting with Marathon Asset Management on 27 th March 2024 the Applicant discussed the potential impact to the Hoppa Bus service. The Applicant will engage with all service providers that have approved access to the North Terminal and South Terminal forecourts, which includes the Hoppa Bus

Topic	Matter Raised	Applicant's Response
	<p>derived from room rates. The appeal of this package depends critically upon the reliability and efficiency of this service as a means of accessing the Airport.</p> <p>The Applicant's Transport Assessment contains no assessment as to the impact of the highways works on the A23 and the Longbridge Roundabout on the operation of the Hoppa bus service and its terminal at the Hotel. This means that the impact on the service and consequently on our Clients' Hotel business cannot be properly understood.</p> <p>GAL has recently confirmed in discussions that it will be necessary to re-route the Hoppa Bus around the Perimeter Road North for a period during the construction of the highway works. At this stage, there is no information as to the likely diversion. Any adverse impacts to the service would directly impact our Clients' ability to compete with other hotels for customers, customer satisfaction and ultimately result in business losses and reputational damage.</p>	<p>service provider, to explore mitigating arrangements during construction. These discussions will consider proposals to, where possible, avoid delays to the services accessing the terminals and therefore impacts upon customers, customer satisfaction, business losses and reputational damage. Terminals and forecourts are intended to remain open and operational during construction, where it is possible to do so safely, notwithstanding the access improvements being undertaken.</p>
<p>Surface Transport: Impact of Construction Works and Traffic</p>	<p>The proposed works to Longbridge Roundabout are immediately adjacent to our Clients' Property.</p> <p>The Transport Assessment contains no assessment of the impact of the construction works on the access to the Hotel. GAL has confirmed in discussions that the access to the Property will need to be closed for a period of time during construction works. Our Clients' position is that closure of their sole access for any period (including at night) would be unacceptable. An alternative design solution will need to be identified in advance of any works that restrict access to the Property. No such provision is yet made in the DCO or otherwise.</p>	<p>At a face to face meeting in London on 27 March 2024 indication temporary access arrangements off of the A271 were discussed. Marathon Asset Management's technical advisor (Stantec) confirmed that of two options detailed they had a preference for one. Marathon Asset Management's technical advisor confirmed that indicative proposal provided evidence that access from a new temporary access was technically achievable.</p> <p>The Applicant will now work up an outline design for the preferred option for inclusion in a negotiated agreement.</p>
<p>Noise</p>	<p>Issues with the Applicant's noise assessment:</p> <ul style="list-style-type: none"> • assessment does not treat the Hotel as a noise sensitive receptor. As a result, there is limited ability for our Client and the Examining Authority to understand what the impact of the Project is upon the acoustic environment enjoyed by the Hotel. • It appears that the relative noise impact of the Project on the Holiday Inn has been severely underestimated as a result of (1) the failing referred to above, and (2) conclusions drawn about the potential noise impact relative to baseline sound data, which baseline is considered to be unreliable. Both these conclusions are considered to be invalid. 	<p>The Applicant met with Marathon Asset Management (MAM) noise consultant on 6th February 2024. Subsequently, on the 13th and 29th February, GAL has provided noise assessment information specific to the Holiday Inn London Gatwick Airport (the Hotel) to address matters raised by MAM. A further productive meeting was held on 27 March 2024 and at the time of writing the next meeting on site was planned for 24 April 2024.</p> <p>The information which has been provided to MAM so far is summarised below. It demonstrates that noise from the operation of the Project is likely to result in effects at the Hotel which are either Minor or Negligible. Noise from specific construction works which will be required close to the Hotel are being further assessed because MAM has stated that the Hotel is used by airline pilots for daytime sleeping and consequently there is the potential for some disturbance. GAL is considering the</p>

Topic	Matter Raised	Applicant's Response
	<p>There is a risk of:</p> <ul style="list-style-type: none"> • Significant increase in day-time and night-time instantaneous noise level events as a result of increased air traffic numbers; • Significant increase in ground noise levels during the night-time period; • Significant impact during construction works related to the widening of the A217 London Road, works to the Longbridge Roundabout and the A23 Bridgeworks; • Potential noise impact from the construction compound related to construction traffic movements and items of fixed equipment associated with the serviced site containers, e.g. welfare and office facilities; and • Potential noise impact due to changes to road traffic volumes. <p>Whilst our Clients remain keen to work with GAL to identify potential impacts from noise, at present it is considered that the Examining Authority does not have sufficient information before it to be able to accurately assess and report upon the likely impact of the Project upon the Hotel.</p> <p>Our Clients and their advisers have made a number of requests for information. GAL's response to these requests has been, in part, unsatisfactory. A number of these requests remain outstanding, which are set out in full in our Written Representation.</p>	<p>effect of mitigation measures that can be applied during the short term construction works that are required in the vicinity and discussions with MAM on this matter are ongoing.</p> <p>The Hotel has been assessed in the ES Chapter 14: Noise and Vibration [APP-039] for construction noise, ground noise, air noise and road traffic noise as discussed below, however as only significant effects need to be reported, it is not specifically identified in the report. Non-residential receptors are assessed initially using the screening noise criteria for residential receptors, See ES Chapter 14: Noise and Vibration [APP-039], paragraph 14.4.76, and Applicants Response to Examiners Question NV.1.7). Where potentially significant effects are identified, receptor-specific details are then considered when assessing significance.</p> <p>Stantec UK Ltd. on behalf of MAM carried out simultaneous noise measurements inside Hotel bedrooms and outside the Hotel. These have been used to estimate a reduction in noise from outside to inside of approximately 30 dB(A). Further work will be carried out to confirm the façade performance and to understand how and which parts of the hotel is used by airline pilots for sleeping during the day.</p> <p>Road traffic noise. The highest noise effects are predicted to occur in 2032. Changes in road traffic noise from the Proposed Development are predicted to be small, see ES Chapter 14: Noise and Vibration Appendix 14.9.4 [APP-174] Table 6.3.1.</p> <p>Additional traffic flows as a result of the Proposed Development on the A217 outside the Hotel are small as it is not a main route for traffic using the airport. The predicted change in road traffic noise (using forecast data from the ES) is up to 0.2 dB and not significant.</p> <p>Traffic modelling data to take into account the impact of the Covid pandemic is being prepared and will be reported in due course. We expect that traffic flows generated by the airport will be unaffected. Therefore, the conclusions of the assessment are likely to remain unchanged.</p> <p>Baseline. Stantec measured sound levels outside the Hotel in 2023 and note they appear to be lower than the 2018 baseline presented in the ES, although the reasons for this are yet to be checked. Stantec has raised the concern that this difference could affect the conclusions of the ES road traffic noise assessment. The ES road traffic noise assessment considers the change in noise as a result of</p>

Topic	Matter Raised	Applicant's Response
		<p>the Proposed Development when it is in operation, which is predicted to be insignificant as described above</p> <p>Air noise. The highest noise effects are predicted to occur in 2032. Results for the Hotel can be found in the Aircraft Noise Viewer online using the hotel's postcode RH60BA. Numbers of air traffic movements forecast for each assessment year can be found in Table 14.7.1 of the ES Chapter 14: Noise and Vibration [APP-039]. Results show predicted L_{Aeq} noise levels at the Hotel are below the LOAEL thresholds, i.e. below 51 dB, $L_{Aeq,16h}$ during the day and 45 dB, $L_{Aeq,8h}$ at night. The Hotel also falls outside the lowest 'Number Above' contours, i.e. it is predicted to experience less than 20 L_{Amax} 65 dB events during the day and less than 10 L_{Amax} 60 dB events during the night in both the with and without Project situations. Therefore, significant effects are not expected from aircraft noise as a result of the Proposed Development.</p> <p>Ground noise. The highest noise effects are predicted to occur in 2032. Appendix 14.9.3, Table 5.4.2 presents predicted ground noise levels for the worst-case assessment year, 2032. Results are presented for the Gatwick Park Hospital, which is near by and is a similar distance to the airport as the Hotel.</p> <p>The highest level at night is predicted to be 51 dB, $L_{Aeq,8h}$ which is above the LOAEL (of 45 dB) but below the SOAEL (of 55 dB). However, assuming a reduction of 30 dB for the Hotel façade, this would result in an internal noise level of 21 dB, L_{Aeq}, which would have a negligible effect on the standard of internal noise levels. L_{Amax} (maximum) noise levels are not expected to increase as a result of the Proposed Development. The highest L_{Amax} noise level inside the Hotel as a result of taxiing noise from Gatwick airport is estimated to be 32 dB, L_{Amax}. This is below the Pro-PG Planning and Noise; New Residential Development, 2017, guideline value of 45 dB. Therefore, significant effects are not expected.</p> <p>Further ground noise assessment for the slower transition fleet has been provided in Appendix B to Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc 10.13) which concludes the ground noise effects will be no worse. The Applicant will meet with Stantec to explain the results and address any queries.</p> <p>Construction noise. The highest predicted construction noise levels at the Hotel are expected as a result of highway works affecting the northeast façade, facing the A217. During the day, the highest noise levels are expected as a result of</p>

Topic	Matter Raised	Applicant's Response
		<p>works at the approaches to the roundabout. During the night, the highest predicted noise levels are expected as a result of works to the A23 Brighton Road Bridge.</p> <p>The compound on the opposite side of the A217 from the Hotel is to be used as a welfare and works compound with no major construction activities generating noise.</p> <p>The ES modelling using BS 5228 is precautionary and assumes only standard noise mitigation measures. GAL is considering the effect of noise barriers to screen the Hotel from works at the approaches to the roundabout and other mitigation measures that can be applied. GAL is sharing the results of this work with MAM and working forward an agreement on how to manage construction noise so as to mitigate in so far as practicable impacts on the hotel.</p>
<p>General: Requested Mitigation</p>	<p>In order to mitigate the risk to our Clients' business operations posed by the impacts of the Project, it will be necessary to put in place measures that are capable of avoiding or minimising the impacts identified above. In particular, the following impacts need to be mitigated:</p> <ul style="list-style-type: none"> • A reduction as far as possible in the permanent land take under the DCO so as to safeguard the development potential of the land towards the south of the Property and protect our Client's private property rights; • The land proposed for permanent compulsory acquisition includes the sole access to the Hotel (plot 1/026). This plot includes part of the turning circle used by vehicles to access the Property. It is essential that a suitable access to the Hotel is maintained during construction and reinstated following completion; • Traffic management solutions that are capable of minimising disruption and delay caused by traffic on the A23 and at the Longbridge roundabout, as well as a clear indication of the programme for such works; • A detailed and receptor specific assessment of, and mitigation of, the noise effects arising from increased number of air traffic movements; ground noise sources, road traffic and construction, supported by validation points at the Hotel. This includes mitigation measures to be contained in a clear construction noise and vibration management plan. It is not possible to identify the likely mitigation required on the present state of information 	<p>The Applicant has provided responses and proposed measures to mitigate losses directly to Marathon Asset Management in correspondence dated 14th March 2024. Those responses and mitigation options were then discussed at a face to face meeting with Marathon Asset Management on 27th March 2024. During this meeting, a review of the potential traffic management solutions was discussed however it was agreed that this matter would be subject to the detailed design.</p> <p>At the face to face meeting with Marathon Asset Management on 27th March 2024, it was agreed that Marathon Asset Management's advisors would draft Heads of Terms, incorporating those terms already put to Marathon Asset Management by The Applicant.</p> <p>The Applicant will continue to discuss potential mitigation measures, detailed consultation on the potential impacts and Heads of Terms with Marathon Asset Management and seek to reach a negotiated agreement.</p>

73 Margaret Abel

73.1.1. Table 73.1 sets out the Applicant's response to the matters raised in the Written Representation from Margaret Abel [\[REP1-223\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 73.1 Response to Written Representation from Margaret Abel

Topic	Matter Raised	Applicant's Response
Greenhouse Gases and Noise	We need less not more planes flying . The Earth is dying due to pollution partly caused by airflight. Also those who live under the flight path are already inundated by aircraft noise please no more. Another runway more buildings with all that goes with that.	The Applicant has provided responses thematically to issues raised relating to greenhouse gases and noise at Sections 4.16 and 4.22, respectively, of the Relevant Representations Report [REP1-048] .

74 Martin and Irene Needham

74.1.1. Table 74.1 sets out the Applicant's response to the matters raised in the Written Representation from Martin and Irene Needham [\[REP1-224\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 74.1 Response to Written Representation from Martin and Irene Needham

Topic	Matter Raised	Applicant's Response
Noise	<p>This expansion of Gatwick Airport will increase significantly to the number of flights to and from the airport. This will cause a significant increase in noise to the surrounding area and will cause noise distress to a large number of people who live and work close to the flight path. My wife and I are strongly opposed to this noise pollution.</p> <p>There appears to be no realistic plans by the airport within this proposal to reduce the noise levels of aircraft taking off which affect residents who live close to the flight path.</p>	<p>The Applicant has responded to concerns regarding increases in noise as a result of the Project at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The impact of increases in aircraft noise from the Project have been fully assessed and all realistic and practicable mitigation measures have been considered. Details are provided ES Chapter 14: Noise and Vibration [APP-039].</p> <p>Many interested parties note that aircraft noise bothers them most in the summer, when aircraft numbers are greatest. The assessment of aircraft noise focuses on an average summer day in order to assess the season of highest noise in accordance with CAA guidance (CAP1616). During the year of greatest noise impact (2032) the Project is forecast to add 19% to the summer season air traffic during the 16 hour day period from 0700 to 2300. The greatest increase at night is forecast to be 10% in the noisiest year (2032). No new flight paths are required in</p>

Topic	Matter Raised	Applicant's Response
		<p>connection with the Project, so the noise impacts are largely as a result of more aircraft in the same locations.</p> <p>Mitigation measures include a substantially improved noise insulation scheme, with an Inner Zone of approximately 400 homes and an Outer Zone of Approximately 3,900 home, a Home Relocation Assistance Scheme for up to approximately 100 homes in the noisiest zone, and a Schools Insulation Scheme see ES Appendix 14.9.10: Noise Insulation Scheme [APP-180].</p>
Air Quality	Gatwick airport already pollutes the area close to the airport particularly from the fumes of planes taking off. Gatwick airport should not be allowed to increase this pollution	The Applicant has responded to concerns from Interested Parties regarding air pollution worsening as a result of the Project at Section 4.3 of the Relevant Representations Report [REP1-048].
Greenhouse Gases	Global warming of our planet is a significant problem and every successive year there is an increase in our planet temperatures. Aeroplanes burn large amounts of fossil fuels particularly during take-off. This must not be allowed to expend further.	The Applicant has responded to concerns regarding increases in greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048].

75 Mary Myers

75.1.1. Table 75.1 sets out the Applicant's response to the matters raised in the Written Representation from Mary Myers [REP1-225]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 75.1 Response to Written Representation from Mary Myers

Topic	Matter Raised	Applicant's Response
Landscape, Townscape and Visual Resources	As residents of Penshurst for the past 44 years, it is quite obvious how much this beautiful AONB has been blighted over the years by the ever increasing volume of air traffic caused by Gatwick Airport	<p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</p> <p>Section 8.9 includes a thorough assessment of effects on the perception of tranquillity within the High Weald National Landscape and other nationally designated landscapes as a result of an increase in the number of overflying aircraft up to 7,000 ft above local ground level compared to the future baseline situation in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Wakehurst Place, Ashdown Forest and Hever Castle in the high Weald). The maximum increase in daily overflights of 15 to 20% is defined in Table 2.2.7 as 'increase in number of daily overflights discernible to people'. It is considered that the increase in overflights may be imperceptible to some receptors. The magnitude of change is generally considered to be negligible and the level of effect up to Minor adverse. Whilst an adverse effect on the perception of tranquillity within nationally designated landscapes is identified</p>

Topic	Matter Raised	Applicant's Response
		as a result of the Project, it is not considered to constitute significant harm to this perceptual quality or people's ability to enjoy these landscapes.
Noise	Constant noise pollution. We are already bombarded with aircraft during the day and disturbing our sleep at night. Aeroplanes still come in very low over us instead of at higher altitude and flying planes smoothly in descent. Government is not enforcing these rules.	<p>The Applicant has responded to concerns regarding existing and new noise impacts at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The noise abatement procedures are defined by the Department for Transport (DfT) under Section 78(1) of the Civil Aviation Act 1982 and published in the UK Aeronautical Information Publication (UKAIP).</p> <p>Performance against the noise abatement procedures assessment criteria is monitored, reported and published in London Gatwick's quarterly and annual noise reports, available on the London Gatwick website.</p> <p>Unless specified, for example in relation to the Departure Noise Limits, no sanctions are required for airline non-conformance. However, London Gatwick has in place a comprehensive process of data gathering, performance analysis and airline engagement aimed to improve airlines' arrival and departure performance. Moreover, London Gatwick is continuing to evolve this process including the development and implementation of a new Low Noise Arrival Metric and the formulation of an industry leading Departure Noise Limits scheme which is planned for implementation in 2024.</p>
Socio-Economics	Pressure on services locally.	<p>The Applicant has provided responses thematically to issues raised relating to the impact on local services at Section 4.25 of the Relevant Representations Report [REP1-048].</p> <p>Section 17 of the Environmental Statement Chapter 17: Socio-Economic [APP-042] identifies that there will be no significant impacts on community facilities.</p>
Climate Change	It's strange how despite the Government's wanting to reduce factors causing "climate change" and plugging its Net Zero credentials on the one hand, it is not doing so if it allows further pollution in various forms in permitting Gatwick Airport to expand and the inevitable aviation pollution.	The Applicant has provided responses thematically to issues raised relating to greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .

76 Matthew Quirk

76.1.1. Table 76.1 sets out the Applicant's response to the matters raised in the Written Representation from Matthew Quirk [\[REP1-226\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 76.1 Response to Written Representation from Matthew Quirk

Topic	Matter Raised	Applicant's Response
Traffic and Transport	<p>This is a revision to my previous representation because:</p> <p>A. There is uncertainty as to how the figures of future passenger numbers are calculated by Gatwick Airport.</p> <p>A.1. I might have counted twice the number of passengers in the Airport's Master Plan, and</p> <p>A.2. Therefore my calculations of the extra traffic are too high</p> <p>A.3. Therefore my assessment of the road congestion is twice what it will actually be</p> <p>A.4. Therefore Gatwick may say the extra traffic will not add to the road congestion</p> <p>A.5. Therefore the Gatwick may suggest the Inquiry should ignore my argument</p>	<p>Comprehensive strategic transport modelling has been undertaken for the Project. Diagram 5.3.1 of the Transport Assessment [AS-079] shows the overall modelling structure for the Gatwick Strategic Model. This aligns with the approach in TAG (Unit M1.1) (Department for Transport, 2014). It comprises three core model components which are the demand model, assignment models and simulation models. Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] provides a full description of the assessment. Based on the modelling work and the assessment of effects related to traffic and transport, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works which form part of the Project.</p> <p>These assessments are based on the use of observed data to calibrate and validate detailed strategic transport models for mode choice and the operation of the highway and public transport networks, using industry standard methodology and guidance issued by the DfT. They provide a detailed forecast of the response to different transport interventions and the assignment of journeys to the highway and public transport networks takes account of and responds to operational conditions indicated in the model. The approach used for the modelling is therefore robust and in line with the approach used for assessing other major developments and infrastructure projects.</p>
Traffic and Transport	<p>B. BUT:</p> <p>B.1. I made the same counting error in my assessment of the traffic flows through the choke points on the M25</p> <p>B.2. Those flows should be halved for each carriageway</p> <p>B.3. The notorious congestion in those areas still happens with those reduced flows</p> <p>B.4. Therefore halving the extra traffic arising from the Master Plan changes the absolute number of car journeys but does not change the ratio of them to the choke points on the motorway.</p> <p>B.5. Therefore Gatwick's Master Plan will still generate unacceptable congestion</p>	As above.
Traffic and Transport	DETAIL:	As above

Topic	Matter Raised	Applicant's Response
	<p>C. Gatwick argues:</p> <p>C.1. Gatwick plans to increase the number of passengers through the airport to 70m per year by 2032 and 75m per year by the late 2030s, from 45.7m per the Master Plan 2019.</p> <p>C.2. This means an extra 24.3m rising to an extra 29.3m passengers.</p> <p>C.3. IF Gatwick counts its passenger numbers by counting heads moving through – being the sum of arrivals and departures – i.e. each individual passenger is counted twice, once on arrival and once on departure:</p> <p>C.4. Then the number of extra individual passengers is not 24.3m rising to 29.3m, as I assumed in my previous submission, but half that, namely 12.15m rising to 14.65m.</p> <p>C.5. 45% of those passengers will go by rail, according to the Master Plan.</p> <p>C.6. So the extra number of people travelling on the roads will be $12.15 \times 55\% = 6.682\text{m}$ rising to $14.65 \times 55\% = 8.057\text{m}$</p> <p>C.7. The extra road congestion depends upon the number of road journeys each of these passengers will make.</p> <p>C.8. Assuming 4 people to a car and no-one being delivered or collected by a taxi or friends/relatives, each car will make 2 journeys: once to and once from the airport.</p> <p>C.9. The number of extra car journeys will therefore be $6.682/4 = 1.67\text{m} \times 2 = 3.34\text{m}$ rising to $8.057/4 \times 2 = 4.028\text{m}$.</p> <p>C.10. This amounts to an extra $3.34\text{m}/365 = 9,150$ rising to $4.028\text{m}/365 = 11,035$ cars on the road per day.</p> <p>C.11. BUT not all cars will have 4 people in them: some people will be delivered and collected by taxis or friends/relatives.</p>	

Topic	Matter Raised	Applicant's Response
	<p>C.12. If every group of 4 were to be delivered or collected by taxi or friends/relatives, then the number of car journeys would double, as the driver has to get to or from the airport him- or her-self.</p> <p>C.13. Similarly if every car held just 2 people rather than 4, or held 2 people plus a driver, then the number of extra car journeys would also increase.</p> <p>C.14. Thus the actual number of extra car journeys depends on the average occupancy of the vehicle plus the average number of journeys made simply by car drivers delivering or collecting passengers. (This ignores the number of extra journeys on local roads arising from people parking at off-airport sites and being bussed in).</p> <p>C.14. Gatwick's Master Plan gives no estimates for these extra car journeys. I made a stab at it in my previous submission, suggesting 24,449 rising to 31,983 extra car journeys per day.</p> <p>C.15 Now that Gatwick charges for drop-offs, they should have a good idea of the numbers of cars arising from people being collected and delivered to the airport. I do not have that information. Although that figure is based on current passenger numbers, it might give some idea of the likely extra journeys required in future as passenger numbers rise, assuming that the current ratio of drop-offs to current passenger numbers stays constant.</p> <p>C.16. That stab failed to recognize that Gatwick counts its individual passengers twice (once on arrival and once on departure) in order to come up with the passenger numbers passing through the airport.</p> <p>C.17. Thus on the assumptions I made about car occupancy etc, the total number of car journeys should be half what I said in my previous submission; the totals should be 12,224 rising to 15,691 per day. On my assumptions, (the length of a Renault Clio being 4m and queuing bumper touching bumper) this is a traffic queue of 30 miles rising to 39 miles.</p>	
Traffic and Transport	<p>D. This halving of my figures does not help Gatwick 's arguments about road congestion on the motorway network, because:</p> <p>D.1.I have treated the traffic numbers in the same way as I treated the Gatwick passenger numbers. (source https://www.gov.uk/government/statistics/road-traffic-estimates-ingreat-britain-2021 page 22)</p>	As above

Topic	Matter Raised	Applicant's Response
	<p>D.2. I assumed the daily number of 180,000 vehicles around the Heathrow side of the M25 and the “more than 180,000 on its busiest days “ (source https://www.gov.uk/government/news/new-data-reveals-Dartford-crossing-carrying-more-foodand-goods-than-ever-before) through the Dartford Crossing were in each carriageway direction rather than split between the two directions.</p> <p>D.3. The DfT gives no breakdown of the split, therefore suppose we assume it is 50/50.</p> <p>D.4. That halving of the traffic numbers counterbalances the halving of the extra car journeys arising from Gatwick's Master Plan.</p> <p>D.5. So although the absolute numbers are lower, the ratio is the same, and it is the ratio that is important in determining the congestion effects of the extra traffic created by Gatwick's Master Plan.</p> <p>D.6. As I mentioned previously, and sourced from the traffic estimates document referred to in D.1. that extra traffic passes through the five local authority areas with the highest traffic in the UK, and over 4 of the five busiest motorway junctions in the UK.</p>	
Traffic and Transport	<p>E. Conclusion:</p> <p>E.1. Whichever way you count the Gatwick passenger and motorway junction traffic numbers, Gatwick's expansion plans will create so much motorway and local road congestion that they will damage the rest of the economy and squeeze out the travel capacity for journeys, both car and lorry freight, from the ports and Channel Tunnel to the rest of the UK, or within the area south of London.</p> <p>E.2. Nor will the Silvertown Tunnel at Blackwall help, because the traffic there is London-bound, not on the Trunk route from the counties north of London through to Gatwick.</p> <p>E.3. Construction of the Lower Thames Crossing, (application currently with the planning inspectorate according to Kent County Council (Dec 1st 2023)) may start in 2026 and be completed by 2032. This will relieve cross-channel lorry congestion at the Dartford Tunnel.</p>	As above

Topic	Matter Raised	Applicant's Response
	<p>E.4. This lorry traffic is at 42% of total Dartford tunnel traffic – source same gov.uk link as in D.2. above. At the traffic rate of 180,000 per day, this is 75,600 lorries.</p> <p>E.5. BUT not all of those lorries are on the cross-channel route. Even if we assume they are, and that all of them use the Lower Thames Crossing, then the Dartford traffic would fall to 104,400 vehicles a day.</p> <p>E.6. Add in the extra 12,224 to 15,691 cars per day as in C.17 above and the total reaches 116,000 to 120,000 vehicles per day – again assuming no lorries at all.</p> <p>E.7. The Dartford Crossing is built to handle 135,000 and handles more only by virtue of dire traffic queues.</p> <p>E.8. So even with the Lower Thames Crossing coming on stream after 2032 the Dartford Crossing with any non-Cross-Channel lorries will remain at peak capacity allowing for no growth of the economy.</p> <p>E.9. Therefore the Gatwick Expansion will still squeeze out the capacity for future growth, therefore it should not be allowed.</p>	

77 Michael Clemens

77.1.1. Table 77.1 sets out the Applicant's response to the matters raised in the Written Representation from Michael Clemens [\[REP1-228\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 77.1 Response to Written Representation from Michael Clemens

Topic	Matter Raised	Applicant's Response
Greenhouse Gases and Climate Change	<p>I wish to express in the strongest possible terms my opposition to a second runway at Gatwick Airport. The inevitable increase in carbon emissions resulting from such a development would be in direct opposition to the UK's legally binding net zero targets. A recommendation of the Climate Change Committee is that there should be no net airport expansion across the UK. It is inevitable that greenhouse gas emissions from flights departing from or arriving at Gatwick will rise as a result of increased aircraft movements and flights, as well as increased travel to the airport by road and more out-of-airport transport to support the operations. This is quite contrary to the need for decreased emissions in order to meet the UK's net zero ambitions. Off-setting schemes and/or the possible use of biomass-based fuels are not a solution as they</p>	<p>The Applicant has provided responses thematically to issues raised relating to greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	would leave the same amount of greenhouse gases in the atmosphere, at a time when levels need to be lower-- not the same or higher	
Greenhouse Gases and Climate Change	Sussex residents are already feeling the effects of climate change on their lives. Temperatures approaching 40oC have arrived more than 20 years earlier than expected, and there has been increased flooding from more intense and frequent storms, as well as coastal erosion. Just in the last few weeks the weather has been unusually warm and unusually wet. 2023 was one of the warmest years on record with global average temperatures above the 1.5oC Paris Agreement target. The Northern Runway proposal does nothing to improve that situation, and in fact can only make it worse.	The Applicant has provided responses thematically to issues raised relating to greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .
Biodiversity Impacts	Not only would a second Gatwick runway run counter to climate change policies but it would have deleterious implications for local biodiversity. One example is the destruction of a woodland corridor along the A23, a consequence of which would be that bats could no longer follow this route, disconnecting their foraging and roosting habitats. No clear indication is given of the impacts of the biodiversity losses, or of the measures that will be taken to compensate for them. Replanting of trees would not replace the loss of mature woodland for many years.	The Applicant has provided responses thematically to issues raised relating to ecology at Section 4.13 of the Relevant Representations Report [REP1-048] .

78 Michael David Croker

78.1.1. Table 78.1 sets out the Applicant's response to the matters raised in the Written Representation from Michael David Croker [\[REP1-229\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 78.1 Response to Written Representation from Michael David Croker

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	<p>The UK government has failed to implement a UK-wide capacity management framework, and GAL has failed to explain satisfactorily how it's expansion will achieve the significant reduction in carbon emissions to meet the CC's target emissions trajectory for its own operations.</p> <p>GAL has failed to explain how the planned near doubling of passenger numbers following conversion of the emergency runway to full time use will help the UK achieve its international carbon reduction obligations, nor how that number of passengers can actually reach the airport given the already severely</p>	The Applicant has provided responses thematically to issues raised relating to greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	restricted public / sustainable travel options, without resource to carbon intensive private travel. (EVs are not low carbon in the context of a net zero world.)	

79 Michael Donegan

79.1.1. Table 79.1 sets out the Applicant's response to the matters raised in the Written Representation from Michael Donegan [REP1-230]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 79.1 Response to Written Representation from Michael Donegan

Topic	Matter Raised	Applicant's Response
Capacity and Operations	My submission centres on the phenomenal noise pollution caused by over flying aircraft. The flight path was changed in 2016 which dramatically increased the traffic of aircraft both on approach and departure often at the same time and at times very low altitudes. We live in an area of outstanding natural beauty, well away from roads or rail lines or any form of ambient noise to disguise and offset the crushing effects of aircraft noise. It is now a fairly constant roar of aircraft overhead	The Applicant has responded to concerns regarding existing and new noise impacts at Section 4.22 of the Relevant Representations Report [REP1-048]. The airspace structures currently in place that service London Gatwick are legally constituted and comply with relevant international and UK aviation safety standards. Changes to airspace (and since 2018 air traffic control procedures) follow a regulated process (CAP 1616), the environmental aspects of which are set out in a statutory set of rules known as the altitude-based priorities (described in the Air Navigation Guidance 2017).
Capacity and Operations	I have been trying to submit via the online portal for the last few days without any success. I believe this could be caused by the fact i am on a short break (holiday) abroad but as you can appreciate it has been very frustrating. The change to the flight path was not subject to any consultation with those affected, indeed for a further two years it was vehemently denied by Gatwick Airport. This is a subject which has to be addressed and a full consultation undertaken with all property owners affected and not ignored as has been the case to date.	

80 Michaela Gall

80.1.1. Table 80.1 sets out the Applicant's response to the matters raised in the Written Representation from Michaela Gall [REP1-231]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 80.1 Response to Written Representation from Michaela Gall

Topic	Matter Raised	Applicant's Response
General	Does not want to live under an "illegal motorway" The sound of aircraft is much more disturbing than mere traffic-- it builds up slowly then resembles a noisy electric appliance (with cheap parts) as it flies overhead then just as the noise starts to diminish the next one repeats the cycle- a form of torture that disturbs, sleep, thought and creativity. But obviously the proposed expansion will impact us all in many ways and I attach below a community letter (Gatwick, Obviously Not (GON)) which addresses those concerns.	<p>The Applicant has responded to concerns regarding existing and new noise impacts at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant has responded to the matters raised by Gatwick Obviously Not in its written representation at Table 39.1 of this document.</p>

81 Mid Sussex District Council

81.1.1. Table 81.1 sets out the Applicant's response to the matters raised in the Written Representation from Mid Sussex District Council [REP1-083]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048], the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15) and the **Statement of Common Ground between Gatwick Airport Limited and Mid Sussex District Council** [REP1-042].

81.1.2. The Applicant also considers that both the Local Impact reports of the West Sussex Authorities and the written representations of the authorities, including Mid Sussex, are notable for the fact that they do not acknowledge or apply the terms of national policies for aviation, which are at least important and relevant and which should provide a balanced framework for the consideration of the application. Accordingly, **Appendix A** of this Response sets out those policy matters which the Applicant considers should have been acknowledged in the Written Representations and to which significant weight should be attached in any attempt to strike the planning balance in this case.

Table 81.1 Response to Written Representation from Mid Sussex District Council

Topic	Matter Raised	Applicant's Response
General	<p>During the pre-application period, Mid Sussex and other Local Authorities had raised concerns regarding the meaningfulness of the Applicant's handling of consultation and engagement, as evidenced in the Joint Adequacy of Consultation report.</p> <p>Mid Sussex remains to be satisfied that the Applicant has presented a robust evidence base to justify the Application and to provide measures to mitigate the social, environmental and economic impacts of the Project. These include:</p> <ul style="list-style-type: none"> The Applicant's failure to present an appropriate need/capacity case for progressing this NSIP. This includes issues with the aircraft sequencing and the bottom-up demand approach adopted which has generated over-optimistic forecasts of capacity and the derived economic benefits 	<p>Full details of the pre-application consultation carried out by the Applicant is set out in the Consultation Report [APP-218] and its Appendices [APP-219 to APP-244]. The application was subsequently accepted for Examination as seen in Notification of Decision to Accept Application [PD-001] on the basis that the Applicant had complied with the pre-application procedure requirements under Part 5, Chapter 2 of the Planning Act 2008 and having regard to Adequacy of Consultation representations received.</p> <p>The Applicant has also provided a separate Appendix A to this document on the Principle of Development, Appendix A – Note on the Principle of Development (Doc Ref. 10.15).</p>

Topic	Matter Raised	Applicant's Response
	<p>arising from such growth and the consequential impacts on mitigation triggers.</p> <ul style="list-style-type: none"> The lack of evidence of specific measures to demonstrate that the various targets set by the Applicant can be met or that mitigations can be achieved e.g. surface access targets or other environmental parameters associated with noise and air quality. 	
<p>Landscape: Overflights over AONBs</p>	<p>The Council is yet to be satisfied that there will not be more intensive use of flightpaths that are currently infrequently used, in particular route 9/WIZAD, which is a Tactical Offload Route. This route is not currently frequently flown. Any intensification in its use will be noticeable and will cause harm to the special characteristics of the protected landscape i.e. the High Weald AONB. The impact on the High Weald AONB is of particular concern to Mid Sussex as 50% of the northern part of the District is within the designation. The Council is concerned that noise impacts on the High Weald AONB in Mid Sussex, including historic parks and gardens within the AONB, have not been robustly assessed.</p> <p>Chapter 9 of the West Sussex Local Impact Report sets out the Authority's position on the impact of the Project on Landscape, Townscape and Visual Impacts.</p> <p>The National Planning Policy Framework (2023) at paragraph 191 states, in relation to ground conditions and pollution:</p> <p><i>“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</i></p> <p><i>[...]</i></p> <p><i>(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;</i></p> <p><i>[...]</i>”</p>	<p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] assesses impacts on the High Weald National Landscape having regard to a number of matters, including CAA guidance (CAP1616 Appendix B, para B30 and B56). The frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of the ES Landscape, Townscape and Visual Resources Figures - Part 2 - Version 2 [REP2-007] together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>Effects on the perception of tranquillity within the High Weald National Landscape as a result of an increase in the number of overflying aircraft up to 7,000 ft above local ground level compared to the future baseline situation in 2032 (See Table 8.9.1 of the ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] for summary of representative assessment locations and overflight numbers).</p> <p><i>‘People generally experience a relatively high level of tranquillity in nationally designated landscapes of high scenic quality. These receptors are likely to be of high or very high sensitivity to change. Overflying aircraft at less than 7,000 feet above local ground level currently form a regular visible or audible feature that forms a slightly discordant aspect when experiencing the landscape. The special qualities that people living within and visiting the High Weald AONB experience, including distant scenic views and the landscape’s relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived’.</i></p> <p>The maximum increase in daily overflights of 15 to 20% is defined in Table 2.2.7 of ES Appendix 8.4.1:Landscape, Townscape and Visual Impact Assessment Methodology [APP-109] as <i>‘increase in number of daily overflights discernible to people’</i>. It is considered that the increase in overflights may be imperceptible to some receptors. The magnitude of change is generally considered to be negligible and the level of effect up to Minor adverse.</p>

Topic	Matter Raised	Applicant's Response
	<p>The High Weald AONB Management Plan (2019), at Objective OQ4, seeks to “Protect and promote the perceptual qualities that people value”. The proposed actions include: “Act to remove and reduce inappropriate noise intrusion, supporting further study into the impacts of noise, such as aircraft noise and traffic on quiet enjoyment”.</p> <p>Environmental Statement (ES) Chapter 8 (APP- 109) section 8.9 does include an assessment of the effects on the perception of tranquillity within the High Weald AONB. It draws the conclusion that the magnitude of change is generally considered to be negligible and the level of effect up to ‘minor adverse’. Mid Sussex considers that the Applicant’s assessment of impact on tranquillity has underplayed the magnitude of change arising from the increase in overflights above nationally designated landscapes. The High Weald AONB Management Plan states that its tranquillity is a valued characteristic, therefore additional noise disturbance is likely to be harmful.</p> <p>ES Chapter 8 Table 2.2.7 (APP-109) indicates a 15 – 20% increase in overflight will have a negligible magnitude of change in perception of tranquillity, with a negligible to minor adverse effect.</p> <p>Figure 8.6.7 (APP – 061) shows that in 2032, with the project, parts of the western section of the AONB will move from 11 – 51 daily overflights to 50 – 100 daily overflights. It is not stated anywhere in the documentation to what extent this increase would be attributable to Gatwick alone with the project in place. This indicates that there could be a significant increase in the number of overflights over parts of the AONB. It is also a greater percentage increase than indicated in table 2.2.7 (APP109). The increased frequency of overflight, over areas which are tranquil in nature, will be very noticeable, and harmful to the special characteristics of the protected landscape.</p> <p>The Council is not satisfied that route 9/WIZAD will not be used routinely to achieve the number of take-offs per hour projected, as set out in the York Aviation report, Appendix C to the LIR. Route 9 overflies the western area of the AONB. As this route is a Tactical Offload Route and not currently frequently flown, any intensification in the use of this route will be noticeable and will cause harm to the special characteristics of the protected landscape. Therefore, the use of this route needs to be controlled.</p>	<p>The Project would increase the number of flights in the area around Gatwick Airport but does not require a change to Airspace structures or flight routings therefore, there is no potential for any area of landscape, either designated or undesignated, that is currently not overflown by aircraft to be overflown as a result of the Project.</p> <p>WIZAD is an existing Standard Instrument Departure (SID) Route which allows tactical routing by air traffic control. The increase in the number of overflights in the future baseline year of 2032 (the year when the greatest increase in overflights from the Project is expected) compared to the baseline year of 2019, including aircraft using the WIZAD SID, is illustrated in ES Landscape, Townscape and Visual Resources Figures - Part 2 – Version 2 [REP2-007], Figure 8.6.6: 2032 Baseline All Overflights. The figure shows an increase in the number of overflights in the area between Crawley and Horsham, when compared with ES Landscape, Townscape and Visual Resources Figures - Part 2 – Version 2 [REP2-007] Figure 8.6.5: 2019 Baseline All Overflights. The heat map shows a general trend from between 1 – 10 flights a day to between 11 – 50 flights a day in the baseline, ie without the Project. Table 8.9.1 includes overflight data for the assessment location nearby at Wakehurst Place within the High Weald National Landscape. 21 overflights occur in the 2019 baseline and 28.2 overflights in the 2032 future baseline, increasing to 33.8 overflights with the Project. Under the baseline/future baseline and with the Project, the use of the WIZAD SID would be based on the current airspace route structure and operated in accordance with any existing restrictions or requirements.</p>
Surface Transport: Train services	It is understood that Network Rail are currently considering the implications of the Project on the rail network, and are reviewing the transport modelling	Based on the comprehensive assessment undertaken for rail capacity, as set out in Chapter 9 of the Transport Assessment [AS-079] , the Project is expected to

Topic	Matter Raised	Applicant's Response
	<p>undertaken by the Applicant. As a result of this Network Rail may seek contributions towards further rail investment, to manage the effect of the project on the rail network and to support mode shift. Mid Sussex is supportive of this further work to ensure impacts on the rail network are mitigated.</p>	<p>increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project and no significant effects would arise for rail users. It is noted that Mid Sussex is supportive of Network Rail modelling.</p>
Surface Transport: Parking	<p>Due to its proximity to Gatwick, parts of Mid Sussex experience unauthorised off-airport parking both on-street and off-street.</p> <p>The enforcement of unauthorised parking is a drain on Council resources, both in terms of time and professional expertise in taking action against breaches in planning control. It is estimated that 20% of a full-time Senior Enforcement Officer's time is spent investigating and enforcing unauthorised off airport parking. Mid Sussex welcomes the provision in the draft legal agreement for contributions to provide off-airport parking support but the contribution should, as a minimum, meet the cost of a full-time Principal Enforcement Officer to be shared across the joint local authorities.</p>	<p>The Applicant notes the support of the proposed contributions for off-airport parking contributions.</p> <p>Commitment 8 of ES Appendix 5.4.1: Surface Assessment Commitments (SAC) [APP-090] provides funding for local authorities to support enforcement actions related to off-airport car parking. The Applicant will continue to engage with local authorities and provide further updates in the form of SoCGs in due course. Paragraph 7 of Schedule 3 of the draft Section 106 Agreement [REP2-004] secures a contribution paid by the Applicant to Crawley Borough Council for the purposes of off-airport traffic management and/or parking control and enforcement with the intention of limiting unauthorised parking, deterring rat running and maintaining traffic flow, which could be used to employ an Enforcement Officer to be shared across the local authorities.</p>
Socio-Economics: Private rental sector	<p>The Applicant's evidence appears to demonstrate that the need for temporary accommodation in Mid Sussex is very small. The Council is concerned that if the greater need cannot be met in Crawley and Reigate and Banstead, it will be pushed into Mid Sussex.</p> <p>The acute pressures on temporary accommodation at and around Crawley are set out in the LIR. Mid Sussex wants to ensure that the Applicant mitigates any additional pressure that the project places on the private rented housing sector. In the first instance the Applicant's evidence suggests there will be direct impacts within Crawley but given the most recent evidence on housing pressures, there will be impacts for Mid Sussex. The Applicant must ensure there is sufficient provision to enable these consequential impacts in Mid Sussex to be mitigated.</p>	<p>The Applicant has addressed housing need during construction within Appendix 17.9.3 to the Environmental Statement [APP-201]. It has been demonstrated that the respective demands for housing from Non-Home Based (NHB) workers at the peak of the construction phase can be accommodated within each local authority area, with sufficient excess capacity. Within The Applicant's Response to Actions ISH2-5 [REP2-005], ISH3 Action Point 4, the Applicant provides further detail, demonstrating that the original conclusions are unchanged in light of the Housing Emergency declared by Crawley Borough Council.</p>
Socio-Economics: Affordable housing	<p>The Applicant has indicated that Crawley has an affordable housing need of 75%, Horsham 36% and Mid Sussex 43% as a percentage of the total housing need, and that the additional need generated by the project is less than the need generated by Local Plan growth.</p> <p>A comparison of the information in table 7.4.3, which sets out an affordable need in Mid Sussex of 43%, against the conclusions in paragraph 7.4.23,</p>	<p>The Applicant has responded to the matters raised by the LIR within The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15). The Applicant has also provided a detailed response to the Housing Emergency declared by Crawley Borough Council within the Applicant's Response to Actions ISH2-5 [REP2-005], ISH3 Action Point 4. It is not considered that the construction workforce would place additional demand on affordable rented housing, as the temporary construction workers would primarily rely on accommodation in the private rented sector, within which there is likely to be</p>

Topic	Matter Raised	Applicant's Response
	<p>which shows delivery of 30% affordable housing on strategic sites in Mid Sussex, indicates a gap between need and delivery of 13%.</p> <p>The LIR explains in greater detail the housing pressures in the North West Sussex Housing Market Area. The Applicant acknowledges that the project will generate an affordable housing need. However, there is a lack of consideration of the additional pressure the Project will place in a situation where current demand cannot already be met in full, thereby exacerbating the existing situation. Mid Sussex wants to ensure that the Applicant mitigates any additional pressure that the project places on the need for affordable housing through the provision of a Housing Fund</p>	<p>sufficient capacity to absorb demand as demonstrated within ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].</p>

82 Mole Valley Chamber of Commerce

82.1.1. Table 80.1 sets out the Applicant's response to the matters raised in the Written Representation from Mole Valley Chamber of Commerce [REP1-232]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 82.1 Response to Written Representation from Mole Valley Chamber of Commerce

Topic	Matter Raised	Applicant's Response
Socio-Economics	<p>I can inform the Inspectorate that the majority of our members and other local businesses, that I represent are in favour of the proposed plans and support the plan to alter the Northern runway for the purpose of allowing increased aircraft movements. There are three main reasons that the local businesses feel this would be good for the local area:</p> <p>An increase in footfall to the local area would be a benefit to both the shops and amenities which will also encourage people to stay in the area.</p> <p>An increased in people using the local Hotel & Hospitality places which the trade needs to boost their revenue after the losses made due to last few years of pore footfall and the pandemic.</p> <p>Local businesses being able to travel from Gatwick to a greater number of countries allowing them to trade, so increasing their revenue.</p>	<p>Noted. The Applicant welcomes the comments in support for the Project.</p>
Socio-Economics	<p>Talking with the local businesses I have found that the majority of them do not find that the movement of aircraft an issue nor do they feel the noise levels are</p>	<p>Noted. The Applicant welcomes the comments in support for the Project.</p>

Topic	Matter Raised	Applicant's Response
	any greater than that of the local & main roads. Therefore, as a Chamber we support the plan to allow the relocation of the Northern runway and the increase of air traffic movements, in the understanding that this will eventually increase support to the local economy and the wellbeing of the area.	

83 Mole Valley Cycling Forum

83.1.1. Table 83.1 sets out the Applicant's response to the matters raised in the Written Representation from Mole Valley Cycling Forum [\[REP1-233\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 83.1 Response to Written Representation from Mole Valley Cycling Forum

Topic	Matter Raised	Applicant's Response
Surface Transport: Active travel	Active Travel England should have been invited to provide evidence into the DCO in their role as a statutory consultee	This is noted and the Applicant has sought to engage with Active Travel England. The Applicant contacted Active Travel England in 2021 as part of its pre-application consultation but received no response. The Applicant has contacted Active Travel England recently to offer engagement and would be willing to do so, but has not yet received any direct contact from Active Travel England as at the time of drafting this response.
Surface Transport: Active travel	<p>Mole Valley Cycling Forum requests that if the DCO is approved, the following conditions relating to local infrastructure changes / additions be included, funded by the airport (eg. through the London Gatwick Sustainable Transport Fund (STF)), in order to mitigate the impact on active travel users by:</p> <ol style="list-style-type: none"> Creating a walking and cycling route onto the airport campus from Povey Cross by creating a cycling/walking addition to the bridge at the Povey Cross entrance, accessed via a vehicle barrier. The bridge is a single carriageway at the moment, a formal cycle / pedestrian access should be provided. From here, a shared use pavement to be installed alongside the Perimeter Road North, providing a safe access for non-motorised traffic. Shared use access should continue into North Terminal (where there currently is no safe cycle access) and on to South Terminal for commuters travelling into London Installing a bus lane along Povey Cross Road from the Longbridge roundabout to Povey Cross. The road is wide enough to incorporate a bus lane without impacting the current 2 directional traffic on Povey Cross Road. The Bus Lane to be enforced by ANPR or similar system, 	<p>The Applicant has responded thematically to comments made within relevant representations regarding active travel connections being improved beyond what is currently proposed by the scheme at 4.26.1 of the Relevant Representations Report [REP1-048].</p> <p>Appendix A: Technical Note - Active Travel Provision Details of The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] provides additional detail on the proposed active travel infrastructure. The following key relevant sections of the technical note provide more information:</p> <ul style="list-style-type: none"> The "Surface Access Highways Plans -- Active Travel" included in Appendix A of the technical note illustrate the active travel infrastructure proposals that from part of Work Nos. 35, 36 and 37. Enhanced connectivity is provided from Longbridge Roundabout to North Terminal Roundabout to South Terminal/Gatwick Train Station via the provisions labelled c17, c31, c10, c9, c8, c40, c6, c5, c4, c3, c2, c41 and c42 on Sheet 1 of the plans. People travelling to/from Povey Cross would access this provision via Povey Cross

Topic	Matter Raised	Applicant's Response
	<p>funded by the airport in perpetuity. The bus lane should be available to cyclists. This will also address the ongoing issues of abuse by taxi and holiday pick-up drivers in the area.</p> <p>c) Making Old Reigate Road a no through road at a point immediately north of Withey Meadows. This will discourage airport-associated traffic (uber/taxi drivers) from loitering in residential areas.</p> <p>d) By reducing the amount of traffic in this part of Reigate Road-- which is quite wide-- space would be freed up and funding should be provided to create another protected 2-way cycle lane on one side of the road</p> <p>e) Extending the shared use (walking and cycling) path that currently runs from Longbridge Roundabout to Westvale Park north as far as Reigate. From Woodhatch junction this can continue over Cockshot Hill by use of the minor side road and Priory Park.</p> <p>f) Resurfacing and upgrading the shared use pavement from Longbridge roundabout to South Terminal to meet LTN/120 standards</p> <p>g) Providing safe, direct, out of road access for pedestrians and cyclists from Longbridge Roundabout to North Terminal. This would ideally be via a pedestrian / cyclist bridge. Currently access there only exists via a dark, muddy and narrow public footpath.</p> <p>h) Completing and upgrading the pavement from Hookwood to Charlwood should meet LTN/120. There is currently a gap of 2/3rds mile of this facility which prevents residents from reaching the airport without use of a car.</p>	<p>Road. The provisions include off carriageway shared use and segregated provision for pedestrians and cyclists along A23 London Road, Perimeter Road North (between Car Park Y and Longbridge Way), Longbridge Way, Gatwick Way and Perimeter Road North (between Gatwick Way and Queensgate roundabout) with onward connectivity provided via existing pedestrian and cyclist routes.</p> <ul style="list-style-type: none"> • Section 2.2 of the note summarises details in relation to internal forecourt works. • Table 1 and 2 provide additional details on the nature of the path and crossings proposed as well as details on the proposed path widths. • Section 3 of the note provided additional details on design standards and guidance considerations. <p>Onward connectivity for pedestrians and cyclists to the north to/from Longbridge Roundabout (including to/from Reigate Road) is provided via the existing off carriageway shared use path on the eastern side of the A217 and Reigate Road, which has recently been upgraded by local authorities. The active travel proposals for the Project include provision to tie into this existing shared use path north of Longbridge Roundabout.</p>
Surface Transport: Active travel	<p>Airport workers, travellers and commuters need to access the airport at all hours, and therefore pedestrian and cyclist access must be safe to use 24/7. The above combined (a) to (h) above, would enable employees and residents from Reigate, Westvale Park, Charlwood, Hookwood and Horley all to reach the airport safely, 24/7 without the use of a car.</p>	<p>This is noted, please see above response.</p>
Surface Transport: Active travel	<p>As noted by the Examining Authority, there is a need for a clearer movement framework with greater detail of pedestrian and cycle routes which we understand that the Applicant has agreed to provide by Deadline 1. We reserve the right to provide further comments once we have had the opportunity to review these documents. We also note with concern that the National Cycle Network Route 21 (which forms part of the Avenue Vert from London to Paris) and which passes through the airport from Horley to Crawley, has been omitted from all the maps provided.</p>	<p>This is noted. Further detail was provided at Deadline 1 See Appendix A of the Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065].</p>

84 Mr & Mrs Maurice Huw Radley

84.1.1. Table 84.1 sets out the Applicant's response to the matters raised in the Written Representation from Mr & Mrs Maurice Huw Radley [\[REP1-234\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 84.1 Response to Written Representation from Mr & Mrs Maurice Huw Radley

Topic	Matter Raised	Applicant's Response
Noise	<p>For some 2/3 years we have been increasingly exposed to higher noise levels mostly emanating from Gatwick departing aircraft travelling over our property ([redacted] and is an AONB zone) Most of these aircraft are flying in westerly or south-westerly direction at altitudes that cause noise intrusion. Most aircraft that cause problems are bound for varies destinations in the Americas (N&S) and destinations in Southern Europe and N Africa. The concerned airlines are many and various both UK registered and overseas. The barometric altitude of the offending aircraft are in a range 7000-9000 and frequently lower. Our property is at 523 ft above sea level so the effective height is lower and therefore noise level we experience is higher.</p>	<p>The Applicant has provided responses thematically to issues raised relating to Noise Levels at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>Ground height is taken into account in the noise modelling used to assess noise impacts from the Project, see para 2.48 of Environmental Research and Consultancy Department (ERCD) Report 2002: Noise Exposure Contours for Gatwick Airport 2019 as referred to in paragraph 2.1.1 of ES Appendix 14.9.2 Air Noise Modelling [APP-172]</p>
Air Quality	<p>In addition there is potentially an increase in air pollution and an impact on the local environment including SSSI areas. All observations other than visual are verified on FlightRadar 24. The proposal to add an additional runway and or to increase activity on the northern runway will make the existing intrusion and pollution even worse. Our understanding is that there will be a huge increase in flights passing over our property at potentially even lower altitude.</p> <p>Go't guidelines for increasing airport capacity including Gatwick are predicated on following a thoroughly robust policy with concerted supportive actions to reduce the environmental impact-- in all aspects.</p> <p>We therefore strongly object to this application and move to dismiss the application and any related variants of it.</p>	<p>The Applicant has provided responses thematically to issues raised relating to Air Quality at Section 4.3 of the Relevant Representations Report [REP1-048].</p>
Needs Case	<p>Furthermore the needs case to support the large number of additional flights is not proven. Given the already high level of aircraft congestion in the South East generally, i's reasonable to judge that there would be a growing safety issue. Thus this application for expansion should be rejected in its entirety.</p>	<p>The Applicant has provided responses thematically to issues raised relating to Need and Forecasting at Section 4.21 of the Relevant Representations Report [REP1-048].</p>

85 Mr I P D Wright

85.1.1. Table 85.1 sets out the Applicant's response to the matters raised in the Written Representation from Mr I P D Wright [\[REP1-236\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 85.1 Response to Written Representation from Mr I P D Wright

Topic	Matter Raised	Applicant's Response
Traffic and Transport	There is already traffic congestion in the general area of Gatwick and the surroundings. Any increase in passengers will exacerbate this problem.	The Applicant has responded thematically to comments made within relevant representations regarding traffic and congestion at Section 4.26 of the Relevant Representations Report [REP1-048] .
Water Environment: Flooding	There is a problem with flood water in the general area and additional housing developments are already increasing the risk.	The Applicant has responded thematically to comments made within relevant representations regarding flooding at Section 4.27 of the Relevant Representations Report [REP1-048] .
Socio-Economics – Housing	As there is already a housing shortage, the anticipated 14,000 extra jobs will be unsupportable in many ways.	<p>The Applicant has responded thematically to comments made within relevant representations regarding impacts of the Project on the local housing supply at Section 4.25 of the Relevant Representations Report [REP1-048].</p> <p>The 14,000 workers will be in jobs spread across a wide area – the six Local Authorities (Croydon, East and West Sussex, Surrey, Kent and Brighton). An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p>
Greenhouse Gases, Climate Change and Noise.	I question the environmental impact of any extra flights, pollution, noise, etc..	The Applicant has responded thematically to comments made within relevant representations regarding climate change, greenhouse gas emissions, and noise at Sections 4.6, 4.16 and 4.22, respectively, of the Relevant Representations Report [REP1-048] .

86 National Highways

86.1.1. Table 86.1 sets out the Applicant's response to the matters raised in the Written Representation from National Highways [\[REP1-088\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#) and **Statement of Common Ground between Gatwick Airport Limited and National Highways** [\[REP1-036\]](#).

Table 86.1 Response to Written Representation from National Highways

Topic	Matter Raised	Applicant's Response
Surface Transport - Traffic Modelling	<p>National Highways is satisfied that initial reporting of the cumulative test scenario, contained within the Accounting for Covid-19 in Transport Modelling [TR020005/AS/121], when compared to the Applicant's original submission documents, demonstrates that the strategic model is responding as anticipated, and that background traffic demand reduces overall.</p> <p>However, National Highways requests that the Applicant re-runs the VISSIM models containing the same parameters and assumptions of the cumulative test scenario to enable National Highways to determine whether the Applicant has demonstrated that the SRN would be able to continue to operate safely and efficiently.</p>	<p>This matter is included at Row 2.20.2.1 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course. VISSIM model sensitivity tests have now also been undertaken for the equivalent 2032 and 2047 scenarios for the post-Covid assumptions, drawing on the strategic model sensitivity tests reported in Accounting for Covid-19 in Transport Modelling [AS-121]. The VISSIM sensitivity tests are reported in Post-Covid VISSIM Sensitivity Tests for 2032 and 2047 (Doc Ref. 10.19) which is being submitted at Deadline 3. They show that in the vicinity of the Airport, the operation of the highway network in the post-Covid sensitivity tests (in both the future baseline and with Project scenarios) is better than that in the core modelling which supported the Application, which confirms the conservative nature of the core modelling in providing a reasonable worst-case assessment.</p> <p>The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Surface Transport - Construction – South Terminal Roundabout	<p>The construction phase of the South Terminal Roundabout will require the Applicant to construct the temporary "longabout" arrangement as shown in Figure 1 and extracted from page 46 of the Appendix 5.3.1 Buildability Report [TR020005/APP/081]. National Highways is concerned that this arrangement introduces short queue lengths within the east and west quadrants of the junction which could compromise the operational efficiency of this layout. National Highways therefore requests the Applicant to provide details of the modelling and associated max queue lengths for this temporary layout.</p>	<p>This matter is included at Row 2.5.1.11 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Surface Transport - Construction – South Terminal Roundabout post construction	<p>Following the completion of the works associated with the South Terminal flyover structure, the Applicant proposes to then proceed with construction works associated with the reinforced earthwork embankments as shown in Figure 2. During this phase, the South Terminal roundabout would revert to a typical roundabout arrangement.</p> <p>National Highways has received a layout which indicates that this temporary signalised roundabout layout would consist of a two-lane circulatory carriageway on both the western, northern and eastern quadrants of the junction, with the southern quadrant being a three-lane arrangement.</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>

Topic	Matter Raised	Applicant's Response
	<p>National Highways is concerned that this layout would reduce traffic capacity at the South Terminal roundabout at a point in time where all traffic would continue to signalise the roundabout. When compared to the existing, proposed and interim Business as Usual layout presented by the Applicant, this temporary layout would appear to offer less capacity, with only two lanes on the western and northern quadrants when compared to the existing three-lane arrangement currently in place.</p>	
<p>Surface Transport - Construction – South Terminal Roundabout post construction access to embankments</p>	<p>During this phase of the works, the Applicant would also proceed with the construction of the reinforced earth embankment. National Highways is not clear from the information provided where works access to both the east and west approach reinforced earthwork embankments are located. National Highways requests further details from the Applicant in relation to these access arrangements in order to assess whether they would be safe and not compromise the operational performance of the slip roads, which under this phase would continue to act as the mainline carriageway.</p>	<p>This matter regarding construction vehicle movements at South Terminal Roundabout is included at Row 2.5.1.11 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
<p>Surface Transport - Construction VISSIM Modelling</p>	<p>Whilst the concerns raised above are primarily focused upon the construction works associated with South Terminal Roundabout, these issues exemplify National Highways' desire to understand the impacts on the SRN during construction. National Highways therefore requests that the Applicant provides VISSIM modelling that reflects all the construction stages that will be required to implement the surface access works, clearly denoting any assumptions that have been made in respect to traffic management restrictions such as lane closures, narrow lanes, and contraflows which may impact operational efficiency.</p>	<p>This matter is included at Rows 2.5.1.3, 2.5.1.4, 2.5.1.7, 2.5.1.8, 2.5.1.9, 2.5.1.10 and 2.5.1.11 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036] The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
<p>Surface Transport - Surface Access Works – Eastbound Connector Road Merge from South Terminal Roundabout</p>	<p>The Applicant's current proposal for the Eastbound Connector Road Merge from South Terminal Roundabout is not considered acceptable to National Highways. This is due to the two-lane exit from the South Terminal Roundabout currently transitioning into a short two to one taper arrangement which subsequently leads into a merge connector road cross section which, in accordance with Design Manual for Roads and Bridges (DMRB) CD122, exceeds the capacity for a one lane plus hard shoulder cross section. The combination of these factors may give rise to an increased risk of side swipe and shunt style collisions in an area where it is anticipated that road users will be unfamiliar with the highways network. National Highways requests that the Applicant reviews the proposal in line with the feedback provided and explore alternative options for consideration. As part of the options appraisal process, consideration should be given to identifying accompanying mitigation measures that would be necessary to ensure that each option operates safely.</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>

Topic	Matter Raised	Applicant's Response
Surface Transport - Surface Access Works – M23 Spur Westbound Diverge	<p>National Highways has highlighted to the Applicant that the current proposed taper and ghost island taper for the M23 Spur Westbound Diverge does not meet the requirements of a rural diverge layout in accordance with DMRB CD122 Table 3.32. The presence of these sub-standard features introduces two non-compliances to the proposed network in this region, the other being the sub-standard weaving length between M23 Junction 9 and the Westbound Diverge. These departures from standard were not previously highlighted to National Highways by the Applicant. From the information provided National Highways is not able to conclude whether this solution is appropriate from a safety and operational perspective.</p> <p>National Highways has therefore requested that the Applicant reviews the options in this location, including assessment and any further mitigation for the risks associated with these proposed departures. This further information should enable National Highways to provide advice on the acceptability of proposed options.</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Surface Transport - Surface Access Works – Segregated Left Turn Lane at M23 Junction 9	<p>National Highways requests that the Applicant provides a detailed narrative, outlining the reasoning and engineering decisions that led to the proposal to change the existing segregated left turn lane to the proposed give way arrangement presented in the DCO Application. This reasoning is essential, alongside the further VISSIM modelling as mentioned under Traffic Modelling and Construction above, in order for National Highways to understand from a safety and operational perspective whether the Applicant's proposed layout is acceptable.</p>	<p>This matter is included at Row 2.20.5.1 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036] The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Surface Transport - Surface Access Works – Provision of Emergency Areas (EA) / Place of Relative Safety (PRS) on the M23 Spur	<p>As part of the Applicant's proposal to change the M23 Spur to an All Purpose Trunk Road (APTR), it is proposed that the existing EA (which is a provision of a smart motorway) would be removed in accordance with DMRB standards for an APTR.</p> <p>National Highways has requested that the Applicant carries out a full GG104 Risk Assessment and agrees with National Highways any amendments or alternative provision identified as a result to ensure the continued safe and effective operation of the SRN.</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Surface Transport - Surface Access Works – Maintenance and Operational Responsibility of A23 London	<p>Preliminary maintenance boundaries submitted by the Applicant to National Highways identify that the National Highways operational responsibility for the signalised junction of the A23 London Road / North Terminal Link Signal Controlled Junction would terminate at the stop line of the North Terminal Link,</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>

Topic	Matter Raised	Applicant's Response
Road / North Terminal Link Signal Controlled Junction	<p>with operational responsibility for the rest of the junction being under the direction of West Sussex County Council.</p> <p>Whilst National Highways agrees with the principles of this arrangement for some elements such as pavement, lighting, signage and road markings, one aspect National Highways has highlighted to the Applicant as a matter for further discussion is the signal infrastructure. It is National Highways' current preference that the operation and maintenance responsibility for all signal infrastructure at this junction resides with National Highways.</p> <p>It is recognised, however, that this matter will need to be agreed between National Highways, West Sussex County Council and the Applicant. Therefore, National Highways will continue discussions with the relevant parties and, subject to an agreement being reached, will introduce details of this agreement into the examination where necessary, or update the ExA as the examination progresses.</p>	
DCO and Protective Provisions – Project Control Framework	<p>The Applicant's proposal will introduce significant changes to the existing Strategic and Local Road Network. Once surface access works are complete National Highways will be transferred the long-term operation and maintenance obligations for the proposed surface access works on the SRN. Therefore, it is imperative for National Highways that a rigorous approval process is implemented to ensure that detailed design, construction, and handover into maintenance is established.</p> <p>National Highways would therefore request that the Applicant commits to undertaking detailed design, construction, and handover into maintenance in accordance with National Highways' PCF process. This framework is used by National Highways as part of its own major projects implementation and would benefit the Applicant as it will assist in the efficient agreement of design and mitigate the risk of delayed endorsement of works in line with protective provisions.</p> <p>National Highways seeks to agree with the Applicant the details of how the PCF approach will be applied to the SRN works. National Highways will be seeking agreement with the Applicant on this point, but until such time as the matter is resolved, National Highways reserves its position on additional provisions within its Protective Provisions, or a side agreement if necessary.</p>	<p>Technical engagement is currently underway with National Highways. This matter will be added to the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>

Topic	Matter Raised	Applicant's Response
<p>DCO and Protective Provisions – Requirement 6 and the Surface Access Works</p>	<p>National Highways is concerned that the Applicant's DCO as drafted offers no security that the surface access works are linked to when these works are actually required from an operational perspective.</p> <p>National Highways' understanding of the Applicant's traffic modelling is that it relies on comparing a future baseline of 2029 – where the highways works (within the scope of the Draft Development Consent Order (dDCO)) are not present – to a future baseline of 2032 where the second runway is assumed to be operational.</p> <p>This relates to the controls provided under Requirement 6 of the Draft Development Consent Order [TR020005/AS/127], where the Applicant:</p> <p><i>“Must use reasonable endeavours to obtain a provisional certificate from National Highways pursuant to paragraph 8 of Part 3 of Schedule 9 in respect of the national highway works by the third anniversary of the commencement of dual runway operations, unless otherwise agreed with National Highways, said agreement not to be unreasonably withheld or delayed.”</i></p> <p>This provision sets a requirement for the Applicant to use reasonable endeavours to obtain a provisional certificate in respect of the highway works “by the third anniversary of the commencement of dual runway operations”. It is National Highways' view that this wording would enable the Applicant to achieve full passenger capacity with no requirement to have actually delivered the surface access works for another three years. In effect, this provides insufficient control over future airport operations and how they relate to impacts which may arise.</p> <p>National Highways requests that Requirement 6 is, at the very least, amended such that the surface access works are in place prior to the operation of the second runway. This relates to National Highways' concern that the modelling only shows 2029 and 2032, and not whether capacity is forecast to be exceeded in the interim years prior to the surface access works being completed. In other words, interim growth between 2029 and 2032 may necessitate the highway works being in place sooner than the Requirement currently legally requires. National Highways therefore requests that</p>	<p>This matter is included at Row 2.7.1.27 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p> <p>The Applicant has further explained its position in response to ExA question DCO.1.40 (R6), Applicant's Response to ExQ1 (Doc Ref. 10.16).</p>

Topic	Matter Raised	Applicant's Response
	Requirement 6 of the draft DCO [TR020005/AS/127] is amended so that the surface access works are in place prior to the commencement of the second runway operations.	
DCO and Protective Provisions – Requirement 6 and the Surface Access Works	<p>Furthermore, between 2029 and 2032, the Applicant will also need to consider, alongside any interim growth, the temporary construction phasing and traffic management works that may reduce capacity on the highways in order to demonstrate that the reported demand can be accommodated through the construction period. National Highways refers the reader to the construction section of this written representation for further details.</p> <p>In addition to the above amendments to Requirement 6, National Highways also requests that the wording “use reasonable endeavours” is removed from Requirement 6. National Highways believes it is not enough for the Applicant to simply use reasonable endeavours to obtain a certificate. All works to the SRN must require a certificate.</p>	<p>This matter is related to Row 2.7.1.27 and Row 2.20.4.5 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]. The Applicant will continue to engage with National Highways on these matters and provide further updates to the SoCG in due course.</p> <p>The Applicant has further explained its position in response to ExA question DCO.1.40 (R6), Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>Specific to the inclusion of 'reasonable endeavours' in the drafting, to clarify - Requirement 6 is intended to ensure that the national highway works are suitably progressed within three years of the commencement of dual runway operations (as defined) and the obtaining of a provisional certificate was selected as an appropriate milestone to use for this obligation. However, to ensure that it is within the undertaker's power to avoid breaching the DCO (and thus avoid the resultant criminal sanction), it is necessary to impose an obligation to use reasonable endeavours to obtain a provisional certificate within the specified timeframe, rather than a definitive obligation to obtain one, as the obtaining of a provisional certificate is not entirely within the control of the undertaker.</p>
DCO and Protective Provisions – Controls	National Highways maintains that the Applicant's proposed control documents relating to highway works and the long-term operation of the Strategic Road Network are inadequate. National Highways proposes to submit into the examination “mark ups” of the Surface Access Commitments [TR020005/APP/090] by Deadline 2 and the outline Traffic Management Plan [TR020005/APP/085] by Deadline 4. National Highways considers these specific suggestions will be helpful to the ExA and notes that the ExA and Secretary of State have the discretion to recommend and require respectively changes made to the Applicant's proposed certified documents (see article 52(2) of the dDCO).	<p>Matters relating to the Surface Access Commitments are included at Rows 2.20.4.2, 2.20.4.4, 2.20.4.5 and 2.20.4.6 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]</p> <p>Matters relating to the Outline Construction Traffic Management Plan are included at Row 2.5.1.12 of the Statement of Common Ground between Gatwick Airport Limited and National Highways [REP1-036]</p> <p>The Applicant is reviewing National Highway's proposed changes to the Surface Access Commitments and Outline Construction Traffic Management Plan. The Applicant will continue to engage with National Highways on this matter and provide further updates to the SoCG in due course.</p>
Business as Usual (BAU) Works	The BAU works, as reported in Section 8 of the Applicant's Strategic Transport Modelling Report [TR020005/APP/260], are factored into the Future Baseline and would include, but are not limited to, the signalisation of both the North and South Terminal Roundabout.	The Future Baseline assumptions of the growth which would occur at the Airport in the absence of the Project include improvement works (including signalisation) of both the North Terminal and South Terminal roundabouts as explained in section 4.4.9 of ES Chapter 4: Existing Site and Operations [APP-029]. As per that section, it is anticipated that these works will be completed by 2029.

Topic	Matter Raised	Applicant's Response
	<p>National Highways previously requested in its Relevant Representation and Principal Areas of Disagreement Summary Statement (PADSS) that the Applicant considers the introduction of a new Requirement 24 as follows:</p> <p><i>24. Gatwick North Terminal and South Terminal Roundabout Signalisation</i></p> <p><i>24. (1) No part of the airport may operate above the passenger capacity permitted at the airport on the date of this Order coming into force, until the North Terminal and South Terminal roundabout signalisation scheme is completed and open for traffic.</i></p> <p>Following receipt of both the Applicant's response to Procedural Decision Notice PD007 [TR020005/AS/114] and planning application reference CR/125/79, National Highways now understands that Gatwick is not constrained by a set passenger capacity. As a consequence, National Highways has updated this position to the following:</p> <p><i>24. Gatwick North Terminal and South Terminal Roundabout Signalisation</i></p> <p><i>24. (1) No part of the authorised development may begin, until the North Terminal and South Terminal roundabout signalisation scheme is completed and open for traffic. This proposed requirement reflects the assumption made in the Applicants traffic modelling that the signalisation is in place prior to the construction of the Project.</i></p> <p>This wording will be reflected in National Highways' PADSS which will be issued at Deadline 2 (2⁶th March). National Highways understands that the Applicant is proposing a securing mechanism for the BAU works and National Highways will therefore reserve its right to provide comments on this wording upon its submission into the examination.</p>	<p>Following discussions with National Highways, GAL has agreed to secure the delivery of these works in the draft DCO. However, in light of the anticipated timescale above, which was noted in the ES, it is considered inappropriate to secure that the works will be delivered prior to the beginning of any part of the authorised development. This would shift the anticipated timetable for these works forward by several years. Instead, GAL can agree to deliver the works prior to commencement of dual runway operations.</p> <p>GAL is engaging with National Highways to seek to agree appropriate drafting to secure these works with a view to including this in the draft DCO in due course.</p>

87 Natural England

87.1.1. Table 87.1 sets out the Applicant's response to the matters raised in the Written Representation from Natural England [\[REP1-089\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#) and **Statement of Common Ground between Gatwick Airport Limited and Natural England** [\[REP1-037\]](#).

87.1.2. The Applicant notes that Natural England has not submitted Part II of its response to the Examining Authority.

Table 87.1 Response to Written Representation from Natural England

Topic	Matter Raised	Applicant's Response
Internationally designated sites	Our position regarding impacts on internationally designated sites is as set out in our Relevant Representations. Further detail on our reasoning for this is given against each impact pathway within our Written Representations Part II	The Applicant has agreed matters relating to the assessment of impacts on internationally designated sites as documented at Row 2.8.3.1 and Row 2.8.3.2 of the Statement of Common Ground between Gatwick Airport Limited and Natural England [REP1-037].
Nationally designated sites	Our position regarding impacts on nationally designated sites is as set out in our Relevant Representations. Further detail on our reasoning for this is given against each impact pathway within our Written Representations Part II.	The Applicant continues to discuss matters relating to the assessment of impacts on nationally designated sites as documented from Row 2.8.2.1 to Row 2.8.2.2 and Row 2.8.3.4 to Row 2.8.3.7 of the Statement of Common Ground between Gatwick Airport Limited and Natural England [REP1-037]
Nationally designated landscapes	Our position regarding nationally designated landscapes is as set out in our Relevant Representations. Further detail on our reasoning to support our Relevant Representations is set out in our Written Representations Part II.	The Applicant continues to discuss matters relating to the assessment of impacts on nationally designated sites as documented from Row 2.14.2.1 to 2.14.2.4 of the Statement of Common Ground between Gatwick Airport Limited and Natural England [REP1-037].
Protected species	Our position regarding impacts on protected species is as set out in our Relevant Representations. Further detail on our reasoning for this is given for each species within our Written Representations Part II.	The Applicant has agreed matters relating to the assessment of impacts on protected species as documented at Row 2.8.3.8 of the Statement of Common Ground between Gatwick Airport Limited and Natural England [REP1-037]. Discussions are ongoing regarding a draft protected species licence as per Row 2.8.5.1.
Biodiversity Net Gain Provision	Our position regarding biodiversity net gain provision is as set out in our Relevant Representations. Further detail on our reasoning to support our Relevant Representations is set out in our Written Representations Part II.	The Applicant has agreed matters relating to biodiversity net gain as documented at Row 2.8.4.1 to Row 2.8.4.3 of the Statement of Common Ground between Gatwick Airport Limited and Natural England [REP1-037].
Soils and best and most versatile agricultural land	Our position regarding soils and best and most versatile agricultural land is as set out in our Relevant Representations. Further detail on our reasoning to support our Relevant Representations is set out in our Written Representations Part II.	Natural England states in their written representation [REP1- 089] paragraph 2.12 that “there are no known issues relating to soils and best and most versatile agricultural land associated with this project”.
Ancient woodland and ancient/veteran trees	Our position regarding ancient woodland and ancient/veteran trees is as set out in our Relevant Representations. Further detail on our reasoning to support our Relevant Representations is set out in our Written Representations Part II.	Natural England states in their Relevant Representations [RR-3223] “Natural England is a statutory consultee for proposals that affect any Sites of Special Scientific Interest and internationally designated sites. For other proposals that affect ancient woodland or ancient and veteran trees outside of these designated sites, please refer to our standing advice”. No further information is provided and no area of concern stated.

88 Network Rail Infrastructure Limited

88.1.1. Table 88.1 sets out the Applicant's response to the matters raised in the Written Representation from Network Rail [REP1-090]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048] and **Statement of Common Ground between Gatwick Airport Limited and Network Rail**

Infrastructure Limited (Doc Ref. 10.1.16) to be submitted at Deadline 5. The Principal Areas of Disagreement Summary Statement submitted as Appendix A to Network Rail's Written Representation forms the basis of the SoCG.

Table 88.1 Response to Written Representation from Network Rail

Topic	Matter Raised	Applicant's Response
Surface Transport: Impact of the proposals on the rail network	The applicant has not proposed any investment in the rail network to meet the additional demand arising from the Northern Runway Project. Without this investment, Network Rail are concerned that the rail system will not have sufficient capacity and reliability at key times to ensure that Gatwick's sustainable mode share targets are realised, and rail passenger experience is maintained or improved.	The Application contains an assessment of the impact of the Project on the rail network in Section 9 of the Transport Assessment [AS-079] and Section 12.9 of ES Chapter 12: Traffic and Transport [AS-076] . This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.
Surface Transport: Impact on rail network capacity	The proposals generate a material increase in rail passenger demand over and above the "business as usual" anticipated increase in demand. There is also variance between the future baseline level of demand indicated by the GHOST model for rail passengers at Gatwick Airport and that forecast by the Department for Transport's Exogenous Demand Growth Estimator (EDGE) model which is used as the basis for rail industry demand forecasting. Network Rail are working to understand the implications of this variance and will continue to work with Gatwick Airport Limited to align forecasts where possible.	Positive engagement is being held with Network Rail and we will continue to work together to seek agreement on these matters. We await completion of their analysis relating to demand forecasting to progress this matter.
Surface Transport: Funding for rail network capacity	As explained at Issue Specific Hearing 4, the applicant's modelling is based on the overall level of rail capacity provided for in the December 2019 timetable (a pre-Covid level of capacity). Since 2019 financial constraints have led to a reduction in network capacity relative to 2019 levels. As such there is theoretical scope to provide a slight increase in total hourly train capacity on the Brighton Main Line north of the airport so as to return to the level of rail capacity the airport had in 2019. However, there is currently no funding for the resumption of rail service capacity to pre-Covid levels – albeit it is recognised as being theoretically possible. At a strategic level, there is no scope to increase the overall level capacity beyond that provided for in the December 2019 timetable without major reconfigurations of the service and/or significant new infrastructure (such as the Brighton Main Line Upgrade Programme). The train service operating in the December 2019 timetable was the most intensive possible service that could be run on the existing infrastructure without unacceptably compromising overall system performance. At peak times there were no more paths available, and the offpeak periods were used as a 'buffer' time for the rail system to recover from delays which accumulated in the peak. Effectively, the December 2019	This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.

Topic	Matter Raised	Applicant's Response
	<p>timetable was the maximum 'cap' to the service volume which could be accommodated, peak and off peak, without infrastructure enhancements or service reconfiguration.</p> <p>Any further capacity upgrades beyond the December 2019 timetable require investment and there is currently no public funding allocated or planned for such upgrades. As it stands, the infrastructure that exists today will be the same infrastructure that will be in place at the point the Northern Runway Project becomes operational (because no further investment is planned). Therefore, the 2019 timetable is the limit of capacity for the foreseeable future. Emerging post-Covid rail industry forecasts, based on the Department for Transport's EDGE model —whilst not yet finalised— indicatively demonstrate that the 2019 level of capacity on the Brighton Main Line will be exhausted in the 2030s. This means that:</p> <ul style="list-style-type: none"> a) the existing capacity will be exhausted even absent the Northern Runway Project; and b) any remaining capacity will be exhausted at or around the point that there will be an uplift in passenger numbers attributable to the Northern Runway Project. <p>Crucially:</p> <ul style="list-style-type: none"> a) there is no public funding currently allocated or planned for the train service or infrastructure mitigation needed to accommodate the additional demand generated by the Northern Runway Project; and b) the applicant has not identified any mechanisms to fund any future shortfall. <p>Network Rail's view is that:</p> <ul style="list-style-type: none"> a) the applicant should provide a reasonable and proportionate contribution to mitigate the effects of airport-driven rail demand growth; and b) the absence of such a commitment is in conflict with Aviation Policy Framework which notes that "The general position for existing airports is that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or services where there is a need to cope with additional passengers travelling to and from expanded or growing airports" (p.75, para. 5.12). <p>At Issue Specific Hearing 4 the applicant referred to the potential for the Sustainable Transport Fund to be used to fund rail interventions. This is a fund</p>	

Topic	Matter Raised	Applicant's Response
	<p>intended to mitigate the impact across various transport modes. Given that we know that interventions will be necessary to deliver the rail service needed to support the Northern Runway Project, Network Rail needs certainty that funding will be available and expects this to be secured via a ringfenced rail-specific fund, or similar, to deliver the necessary interventions at the point they are required.</p>	
Surface Transport: Rail crowding modelling	<p>As detailed in Appendix A, there are specific clarifications that Network Rail needs in order to fully interrogate the model. Based on the information seen to date, Network Rail disputes the applicant's conclusion that "no significant increase in crowding on rail services is expected as a result of the Project" and that therefore "no additional mitigation is required" (Transport Assessment, page 73). In particular, Network Rail has concerns that the model artificially aggregates and smooths out demand between individual services and service groups, resulting in lighter than average train loads than is commonly seen on some service groups. This is a result of the applicant measuring and reporting rail capacity utilisation on an aggregated, hour-by-hour basis.</p> <p>Network Rail is engaging with the applicant to obtain these clarifications and discuss its concerns. Network Rail requests that it be given the opportunity to update the Examining Authority as discussions progress.</p>	<p>This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.</p>
Surface Transport: Station capacity	<p>The Gatwick Station Project opened in late 2023 delivering additional station capacity and an improved passenger experience. The station project was designed to accommodate forecast levels of demand as far as 2036 and explicitly did not account for the impact of the Northern Runway Project. The applicant's Transport Assessment indicates that there are some instances of crowding, in particular at the arrival ticket barriers, which may require further interventions.</p> <p>The applicant's station capacity analysis is based on a model of the new station. Now that the station improvements are complete, Network Rail considers it important that a model validation exercise is undertaken to ensure that the modelled patterns reflect the real-world patterns at the station. Once this exercise is undertaken Network Rail will be able to comment further on the need for any mitigative measures at the station.</p>	<p>This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.</p>
Proposed acquisition of land belonging to Network Rail	<p>If exercised these compulsory acquisition powers would seriously compromise Network Rail's ability to carry out its statutory undertaking. Accordingly, Network Rail objects to the inclusion of any part of its land in the draft Order and objects to the grant of compulsory acquisition powers in respect of its land. Network Rail also objects to all other compulsory purchase powers or access</p>	<p>This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.</p>

Topic	Matter Raised	Applicant's Response
	<p>rights in the draft Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests.</p> <p>Network Rail is currently reviewing whether the Book of Reference accurately reflects the extent of their interests in the Order land. Given the number of plots involved, this is a time consuming task. A meeting with the applicant's land referencers is scheduled for 15 March 2024 to discuss the impact on Network Rail land, and, specifically, land which has been acquired for the purpose of their undertaking.</p> <p>It is understood that some of the compulsory purchase powers are sought to facilitate the widening of Airport Way which spans the railway. The precise impact of the works on the railway line is being assessed and the carrying out of any works is subject to the clearance process (which is explained below). As a matter of caution, Network Rail wishes to reserve its right to attend the Compulsory Acquisition Hearing scheduled for Thursday 2 May.</p>	
Asset protection	<p>It is essential to the safe and efficient operation of the railway network that Network Rail's assets are appropriately protected during both the construction and operational phases. Clearance is a two stage process by which Network Rail's technical and asset protection engineers review a proposal before clearance can be granted for a proposal to proceed. Clearance may be granted to subject to conditions and requirements.</p> <p>Network Rail is in the process of applying for clearance. Until the outcome of the clearance process is known Network Rail is unable to comment fully on the impact of the proposals on its operational railway. Network Rail intends to keep the Examining Authority informed regarding the clearance process at the relevant examination deadlines.</p> <p>To ensure that Network Rail's assets are not adversely impacted: (a) the applicant must commit to entering into any asset protection agreement(s) and any other documents required by Network Rail for the benefit and protection of its railway (to be in a form stipulated by Network Rail); and (b) Network Rail will need to be confident that the proposals will not compromise its duties to operate, maintain, renew and inspect its railway.</p>	<p>This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.</p>
Protective Provisions	<p>The submitted form of the draft DCO does not include any protective provisions in favour of Network Rail. In order to properly protect its undertaking (particularly having regard to the number of plots in which Network Rail is understood to have an interest) Network Rail requires the form of protective provisions at Annex B to this document to be included in the final form of the Order.</p>	<p>This matter is included in the Statement of Common Ground between Gatwick Airport Limited and Network Rail (Doc Ref. 10.1.16), which is currently under discussion prior to submission at Deadline 5. Technical engagement with Network Rail is ongoing.</p>

Topic	Matter Raised	Applicant's Response
	Network Rail has had positive discussions with the applicant's solicitors regarding the form of protective provisions and will update the Examining Authority further on those discussions as they progress.	

89 New Economics Foundation (Dr Alex Chapman)

89.1.1. The Applicant has provided a separate response to the detailed matters raised by the New Economics Foundation at **Appendix D** (Doc Ref. 10.14).

90 Niall Frazer

90.1.1. Table 90.1 sets out the Applicant's response to the matters raised in the Written Representation from Niall Frazer [\[REP1-243\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 90.1 Response to Written Representation from Niall Frazer

Topic	Matter Raised	Applicant's Response
General	Despite uproar from the public some years back, here we are again with Gatwick trying to build another runway. The fact is the airport extension is not welcome by the majority of people in the surrounding area. My family and I have lived in Warnham for decades and so we know the sentiment across many villages. This is nothing short of profiteering by Gatwick plc at the expense of the locals. If you don't agree with me, then have a vote, and see how negatively this proposal is viewed.	The Applicant has responded thematically to comments made within relevant representations regarding the needs case for the Project, and the associated Socio-Economic impacts at 4.21.1 and 4.25.1 (respectively) of the Relevant Representations Report [REP1-048] .

91 Nicholas Jupp

91.1.1. Table 91.1 sets out the Applicant's response to the matters raised in the Written Representation from Nicholas Jupp [\[REP1-244\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 91.1 Response to Written Representation from Nicholas Jupp

Topic	Matter Raised	Applicant's Response
Noise and Vibration	I live in the flight path and believe that there is too much air traffic noise and that any additional air traffic would constitute a breach of the noise levels that I'm currently experiencing. The noise from generated by airports is usually on the takeoff of a aircraft in the case of Gatwick airport. This is generally in a Westerly direction. I believe the emergency runway is going to be used for	The Applicant has responded thematically to comments made within relevant representations regarding the noise impacts at Section 4.21 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	departures which will double the air traffic noise to the west of Gatwick airport as the existing runway is also used mainly for departures due to the prevailing South West prevailing wind	
Surface transport	I believe that having an additional runway will increase the amount of air traffic and therefore increase the amount of vehicular traffic in and around Gatwick airport, which the current infrastructure will not support.	The Applicant has responded thematically to comments made within relevant representations regarding vehicular traffic at Section 4.26 of the Relevant Representations Report [REP1-048] .
Air quality	In common with other areas surrounding airports, I believe the air pollution would be excessive for those living in the area of Gatwick airport. London already has an excess of air pollution as the mayor of London is introduced and extended the U-Lez area. Therefore, any increase of air traffic in the Gatwick area would increase the amount of air pollution additionally taking into consideration the extensive building in around Crawley and Horsham and the growth of young families. This will be detrimental to young people.	The Applicant has responded to concerns that air quality will worsen as a result of NRP and concerns regarding human health at Section 4.3 of its Relevant Representations Report [REP1-048] .
General	My last factor is the current emergency runway is only used in an emergency. By replacing the emergency runway is the Authority being disingenuous in it's application and trying to get consent in an underhand manner where if they were to try and get consent for an additional runway they know that this would be refused.	The Applicant has responded thematically to comments made within relevant representations regarding concerns that the Project is a new runway at Section 4.21 of the Relevant Representations Report [REP1-048] .

92 Nick Barnett

92.1.1. Table 92.1 sets out the Applicant's response to the matters raised in the Written Representation from Nick Barnett [\[REP1-245\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 92.1 Response to Written Representation from Nick Barnett

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	I would like to know what GAL's projection of the rise in the proportion of flights that will be electric or hydrogen fuelled, as opposed to fossil fuelled. Clearly, the fewer that run on aviation fuel, the better, but have GAL projected battery-powered or hydrogen-fuelled flights? If not, why not?	Paragraph 3.1.2 of Appendix 16.9.4: Aviation Greenhouse Gas Emissions [APP-194] sets out the assumptions included for the inclusion of zero emission aircraft.
Forecasting and Need	Why have the projections of most of the criteria looked at the increase from the current airport limit, to the limit with the new facilities? What the possible increase (and ∴ impact) is actually projected to be is from the current used, not the current maximum, and there is clearly less of an increase from the current maximum to the expanded maximum, than from the current used to the expanded maximum, and so less of an impact too. It looks like cooking the books.	With regards to forecasting included within the GHG assessment, the approach set out in ES Chapter 16: Greenhouse Gases [APP-041] has been to consider both the net emissions arising from the NRP (based on the future baseline of 67 mppa) but also the gross emissions arising from the operation of the airport under the Project. In line with IEMA guidance the assessment contextualises the gross emissions across Construction, ABAGO, Surface Access, and Aviation against

Topic	Matter Raised	Applicant's Response
		relevant trajectories, and also contextualises these gross emissions against the UK carbon budgets.
Greenhouse Gases	Flying is a major source of pollution that people are more easily able not to cause, than are things caused by everyday life: their daily commute, say, or heating their old and draughty home. As the climate problems become increasingly clear and concerning, particularly to young people, and as old people die and young people grow up, flying may acquire a social stigma against it. Is that factored in to GAL's projected increase in flights/passengers? If not, should the inspectors discount them to a certain extent?	The forecasts have adopted the DfT's Jet Zero demand growth trajectory which captures policy related factors relevant to demand forecasting. Example policies include EU ETS, UK ETS, CORSIA, Carbon pricing, taxation and other factors. Future growth rates forecast by the DfT are materially lower than historical growth rates observed in the UK's aviation market.

93 Nutfield Conservation Society

93.1.1. Table 93.1 sets out the Applicant's response to the matters raised in the Written Representation from the Nutfield Conservation Society [REP1-247]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 93.1 Response to Written Representation from the Nutfield Conservation Society

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	We oppose the proposed development on the grounds that it is unproven and unlikely that it can proceed without endangering compliance with UK decarbonisation targets, thereby exacerbating climate change; also that efforts to comply are likely to be so expensive as to undermine the economic case for the development. In particular, to the extent that expansion of flight and passenger numbers will rely on the development of alternative fuels, including so-called Sustainable Aviation Fuel, there is no evidence that such fuels will be available within the time frame of such expansion. Indeed evidence points in the opposite direction.	<p>The uncertainty around the rate at which technological opportunities to reduce the impacts of aviation is recognised. The UK Government responded directly to the 2022 Climate Change Committee recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> • <i>“197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our ‘high ambition’ scenario has residual emissions of 19 MtCO₂e in 2050, compared to 23 MtCO₂e residual emissions in the CCC’s Balanced Pathway.</i> • <i>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</i>

Topic	Matter Raised	Applicant's Response
		<p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • “We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. • The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. • If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK’s overall 2050 net zero target.”

94 Penny Tyson-Davies

94.1.1. Table 94.1 sets out the Applicant’s response to the matters raised in the Written Representation from Penny Tyson-Davies [\[REP1-239\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 94.1 Response to Written Representation from Penny Tyson-Davies

Topic	Matter Raised	Applicant's Response
General	<p>We have lived close to Gatwick for 53 years. This cynical application to utilise the emergency runway as a second formal runway is contrary to wider government policy and would be utilising valuable resources in its institution. Residents should be protected from a development that would increase air and noise pollution, and savage the rural environment we currently enjoy. The infrastructure exercise is being promoted without any real help from GAL resulting in the costs of road and rail upgrades being met by the taxpayer. This is unacceptable and would result in the whole surrounding infrastructure becoming overstretched, clogged with traffic and creating even greater air pollution. The area is also on a flood plain and when flooding occurs, all routes can be closed. There is almost zero unemployment in the area, so where would extra staff be found? In a drought year, there is not enough water available. PLEASE do not permit this rape of our countryside. Corporate greed</p>	<p>The Applicant has provided responses to Interested Parties that have raised the same concerns on the Project’s compliance with government policy at Section 4.21 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant has also provided responses to general concerns regarding the impact of the Project on air quality, noise, agricultural land, transport, water and socio-economics at Sections 4.3, 4.22, 4.2, 4.26, 4.27 and 4.25 respectively of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	should not dictate the future of air travel in the UK especially when it is to the detriment of those living nearby	

95 Peter John Bradley

95.1.1. Table 95.1 sets out the Applicant's response to the matters raised in the Written Representation from Peter John Bradley [\[REP1-253\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 95.1 Response to Written Representation from Peter John Bradley

Topic	Matter Raised	Applicant's Response
Air quality, and ecology and conservation	Existing flights cause excessive pollution in terms of noise and damage to the environment, and the provision of a second runway, with the accompanying new buildings, terminals, and flights, would at least double the amount of that pollution. That damage cannot be justified.	The Applicant has responded thematically to comments made within relevant representations regarding air quality, and ecology and nature conservation, at Sections 4.3 and 4.13 (respectively) of the Relevant Representations Report [REP1-048] .

96 Paul Tyson-Davies

96.1.1. Table 96.1 sets out the Applicant's response to the matters raised in the Written Representation from Paul Tyson-Davies [\[REP1-252\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 96.1 Response to Written Representation from Paul Tyson-Davies

Topic	Matter Raised	Applicant's Response
Policy	The building of a new runway (not really using an exciting 1 is it, it is a taxiway they will be moving and extending and why do they no longer need an emergency run way?) would change local residents lives forever all in the name of greed from the owners. Tell me why the public inquiry a few years ago decided Heathrow was the obvious choice and not Gatwick? What has changed?	The Applicant has addressed this point directly in its response to Written Representations from CAGNE – see Appendix B (Doc Ref. 10.14).
Socio-Economics	Economic benefits, 14000 jobs, do we need them? You can walk into Gatwick tomorrow and get a job, there is no need for a development for jobs around here. If you are being told people in Croydon would love the offer of jobs at Gatwick then I ask why aren't they filling the vacancies now? I run a semi rural business that I would love to expand but would need to rent a unit to do so,	The 14,000 jobs are across a wider area (covering Croydon, East and West Sussex, Surrey, Kent and Brighton). Only 3,200 would be on-site. The detail on the type and location of jobs is included in ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200] .

Topic	Matter Raised	Applicant's Response
	<p>Gatwick prices me out. I have a friend who recently had to close an extremely successful rural business after 20 yrs because she had to find new premises and she would have run at a loss because Gatwick prices local businesses out of the market.</p> <p>Expanding Gatwick will destroy the rural locations surrounding it, not just by destroying our countryside, polluting our air but also by forcing rural businesses out of the area. We will just get new businesses moving and creating more low grade jobs working night shifts etc as are already being offered at Gatwick, those wages can only support living in a house of multi occupancy not jobs to support local families renting or paying a mortgage.</p>	<p>GAL is committed to enhancing the economic benefits of the NRP through its ES Appendix 17.8.1: Employment Skills and Business Strategy [APP-198].</p>
Surface Transport	<p>This leads to more people being transported into the area, how? The trains and major roads only run north to south, our local roads are falling apart with the current level of traffic, they won't cope with such an increase. The trains do not run 24hrs to cater for the shift workers they think they will ship in. Will Gatwick be paying in the future for the upkeep of our roads or will they just claim they were already damaged and we will all get our local taxes put up to pay for Gatwicks damage. Without a doubt if Gatwick is allowed to make this unnecessary expansion then it will destroy the local areas, both financially and health wise, local residents will end up paying with both of these.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and rail impacts at Section 4.26 of the Relevant Representations Report [REP1-048].</p> <p>The need for early morning and evening services is already recognised by the Applicant and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment [AS-079], as well as the benefit of strengthening weekend services. The Applicant has worked with Metrobus to develop an extensive, 24-hour, local bus network. The Applicant routinely liaises with public transport operators to explore service improvements, whether separately or as part of discussions with the Transport Forum Steering Group and wider Gatwick Transport Forum.</p>

97 Rachel Sellers

97.1.1. Table 97.1 sets out the Applicant's response to the matters raised in the Written Representation from Rachel Sellers [REP1-257]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 97.1 Response to Written Representation from Rachel Sellers

Topic	Matter Raised	Applicant's Response
Health and Wellbeing	<p>In light of our current mental health crisis, COP 26 and 27, noise pollution, air pollution and the climate crisis, the forthcoming planning MUST prioritise the human and environmental impact over and above financial gain!</p>	<p>ES Chapter 18: Health and Wellbeing [APP-043] discusses mental health, vulnerable groups and health inequalities. The assessment signposts to and sets out appropriate mitigation to protect population health. See for example Section 18.7 and Table 18.7.1 of ES Chapter 18: Health and Wellbeing [APP-043].</p> <p>The UK Health Security Agency (UKHSA) and the Department of Health and Social Care Office for Health Improvement and Disparities (OHID) are the national statutory stakeholders for public health, and were previously collectively Public</p>

Topic	Matter Raised	Applicant's Response
		Health England. UKHSA and OHID in their combined relevant representation [RR-4687] of October 2023 confirm that: “Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health”.
Policy	The airport has failed to demonstrate that there is a need for additional airport capacity that is consistent with government policy as set out in the Airports National Policy Statement.	The Applicant has submitted substantial evidence to demonstrate the need for the NRP – for example in the Needs Case [APP-250] and, for example, in its Needs Case Technical Appendix [REP1-052] Gatwick has a unique need for additional capacity now in order to enhance the resilience of the Airport. It also has a pressing need to meet outstanding documented demand for airlines for slots at Gatwick.
Employment and Economics	The employment benefits Gatwick claims the project would deliver are misleading. Its own consultant, Oxera, says that the project is not expected to result in material net job creation at the national level. Any local or regional job creation would be by displacement from other regions and therefore likely to be inconsistent with the government’s levelling up agenda. Gatwick’s assessment of the economic benefits and costs of the proposed project is based on unsupportable or out-of-date assumptions, together with omissions and errors. Correction of these assumptions, omissions, and errors would have a significant effect on the overall benefit-cost of the proposed scheme. It is likely that the scheme in fact has a negative net present value and therefore represents a highly unattractive proposition from a public interest perspective.	The Applicant has responded thematically to comments made within relevant representations regarding the use out out-of-date assumptions at Section 4.25 of the Relevant Representations Report [REP1-048].
Greenhouse Gases	<p>The government’s climate change advisers have made clear that there is no case for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impact.</p> <p>Expansion and growth at Gatwick would increase the airport’s CO2 emissions by nearly 50% from 2018. Emissions attributable to Gatwick alone would grow from less than 1% in 2019 to over 5.5% of total UK emissions by 2038. An increase in emissions of this (or any) scale would have a material impact on the UK’s ability to meet its carbon reduction targets and is therefore inconsistent with government policy.</p> <p>The airport has no credible plans to mitigate these emissions because viable low-carbon technologies do not currently exist for commercial aviation. Gatwick has also failed to assess or quantify the non-CO2 effects of its proposed growth and must do so based on the best available scientific evidence. It must</p>	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK’s legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p> <p>The Government has set out its continuing approach to policy development in relation to non-CO2 GHG, both in the Jet Zero Strategy and most recently in Jet Zero One Year On (which confirms at page 33 that the Government is committing to further research the effect of non-CO2 impacts in order to develop any necessary policy response).</p>

Topic	Matter Raised	Applicant's Response
	<p>also monetise and report its emissions using the latest government carbon value figures.</p> <p>Any growth at Gatwick should be conditional on it achieving a progressive, material reduction in the total climate impacts facilitated by the airport from a 2019 baseline. A reduction trajectory should be set, independently monitored, and enforced.</p>	<p>These matters were considered at the Stansted inquiry in 2021 where the Inspectors concluded:</p> <p><i>“98, in this context, therefore, the potential effects on climate change from non-carbon sources are not a reasonable basis to resist the proposed development, particularly bearing in mind the government’s established policy objective of making the best use of MBU Airports. Moreover, if a precautionary approach were to be taken on this matter, it would be likely to have the effect of placing an embargo on all airport capacity – changing development, including at MBU airports, which seems far removed from the government’s intention.”</i></p>
General Environmental	<p>Expansion at Gatwick would have devastating consequences for local communities and people under flight paths: there would be more noise, more road, and rail congestion, worse air quality, and properties under flight paths would be devalued.</p> <p>Gatwick’s analysis of the noise impacts of its proposed expansion is deliberately and cynically misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose inappropriate metrics and limits, do not comply with government policy, and lack adequate enforcement arrangements.</p> <p>They have also been put forward without the stakeholder discussion required by the CAA, in contrast to the approach taken by other airports.</p>	<p>The Applicant has responded to these comments on noise impacts under flight paths, the Noise Envelope proposals, and consultation on the Noise Envelope in the thematic responses provided in Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>Based on the modelling work and assessment presented in ES Chapter 12: Traffic and Transport [AS-076], the Transport Assessment [AS-079], the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works surface access improvement works as part of the Project. The proposed highway mitigation provides benefits to both airport and non-airport traffic, relieving congestion that would otherwise occur in future years in the absence of the Project and associated highway improvements. The development of the highway works includes specific mitigation in relation to road traffic noise.</p> <p>Section 12.9 of ES Chapter 12: Traffic and Transport [AS-076] and Section 9 of the Transport Assessment [AS-079] provide the outcomes of the assessment of the effects of the Project on train loadings. The assessment notes that the greatest increases in patronage resulting from the Project would occur in the counter-peak direction or in off-peak periods, when trains are less busy. It concludes that seated and/or standing capacity would remain available in all cases and that no mitigation or additional capacity is required.</p>

98 Reigate and Banstead Borough Council

98.1.1. The Applicant’s response to the matters raised in the Written Representation from Reigate and Banstead Borough Council [REP1-094] are contained at Section 2 of the **Applicant’s Response to Local Impact Reports** (Doc Ref. 10.15) and therefore has not reproduced those responses in this document.

99 Ronald Ledbury

99.1.1. Table 99.1 sets out the Applicant's response to the matters raised in the Written Representation from Ronald Ledbury [\[REP1-258\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 99.1 Response to Written Representation from Ronald Ledbury

Topic	Matter Raised	Applicant's Response
Policy	Not a development of an existing runway.	The Applicant has addressed this point directly in its response to Written Representations form CAGNE – see Appendix B – Response to CAGNE Written Representation (Doc Ref. 10.14).
Policy	It does not comply with the Governments Aviation Strategy.	Government policy is set out principally in the Airports National Policy Statement (ANPS) and the publication Beyond the Horizon – making best use of existing runways. Both policy documents directly support making best use of under-used capacity at all airports other than Heathrow.
Noise and Vibration	Will lead to an increase in aircraft noise due to some + 100,000 extra flights a year.	The Applicant has responded to these comment on noise impacts due to increased flight numbers in the thematic responses provided in Section 4.22 of the Relevant Representations Report [REP1-048]
Socio-Economics	There is a lack of affordable houses for workers & needed amenities and any that do relocate will not be easily able to walk or cycle to work.	The Applicant has provided a response to concerns regarding affordable housing and the use of active travel in its thematic responses at Section 4.25 of the Relevant Representations Report [REP1-048] .
Socio-Economics	Low skilled jobs are offered with little job security due to the volatile nature of airports leisure business.	The Applicant has provided a response to concerns regarding low skilled jobs and security in its thematic responses at Section 4.25 of the Relevant Representations Report [REP1-048] .
Surface Transport	Gatwick is served by the M23, which is deemed an unsafe smart road. Traffic increases for workers, passengers and freight will cause increased local congestion and air pollution.	The Applicant has responded thematically to comments made within relevant representations regarding Smart Motorways and road traffic demand at 4.26.1 of the Relevant Representations Report [REP1-048] .
Capacity and Operations	If the current emergency runway is not available should this proposal proceed, it will lead to additional air plane stacking, noise & air pollution.	<p>The concept of operation will allow for single runway operations, including for example during the night period when the Northern Runway will not routinely be used between 2300-0600. In the event of either the Main or Northern runways being unavailable the airport would revert to a single runway operation.</p> <p>As detailed in paragraphs 7.2.12 to 7.2.16 of the Needs Case [APP-250] the Northern runway, in its current position, does not support resilience in the most common disruption events, which is short term closures of the Main runway. This is due to the time taken to change runways and the reduced capacity of the Northern runway. The Northern runway project increases the capability of the Northern runway and ensures that when there is a single runway outage the other runway can continue to operate to deliver prioritised movements.</p>

Topic	Matter Raised	Applicant's Response
Surface Transport	The train station can't be easily extended for the increased volume of passengers expected.	The Applicant has responded thematically to comments made within relevant representations regarding rail passenger demand at 4.26.1 of the Relevant Representations Report [REP1-048].
Greenhouse Gases	Extra carbon emissions will add to the climate emergency.	The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.

100 Rusper Parish Council

100.1.1. Table 100.1 sets out the Applicant's response to the matters raised in the Written Representation from Rusper Parish Council [REP1-259]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 100.1 Response to Written Representation from Rusper Parish Council

Topic	Matter Raised	Applicant's Response
Growth forecasting, and night flights	<p>It had been anticipated that these first Hearing sessions might have included a focus on the issues which greatly concern the community I represent. These are the forecast potential increase in overall movements should the Northern Runway become fully operational and both the existing and any consequential increase in Night Movements.</p> <p>It is important that one recognises that the rationale behind the Northern Runway Project is primarily due to Gatwick's forecast that a growth in potential passenger numbers would require an increase in the number of Aircraft Movements. As per our previous submission of March 4, we believe these projections are flawed for the reasons stated.</p> <p>It is understood that the review of movements and night flights could be the subject of further examination meetings of the Planning Inspectorate, which we would welcome.</p> <p>To assist the Inspectors in understanding our concerns, I attach within Appendix 1, several tables showing the comparisons of actual movements at Gatwick Airport between the current positions and the period immediately prior</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding the forecasting of growth and demand at Table 4.21.1 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant has responded to concerns regarding increase in night movements at Section 4.22 of the Relevant Representations Report [REP1-048].</p> <p>The assessment assumes the extant Night Restrictions imposed by the DfT through the Civil Aviation Act 1982 will continue to limit aircraft movements and noise in the 2330 to 0600 hours period. So that in the noisiest year, 2032, the Project would increase the numbers of flights in the average summer 8 hour night period 2300 to 0700 by 12, from 125 to 137, an increase of 10%. The Northern Runway will not be used at night between 2300 and 0600 unless required to facilitate maintenance or other work, as currently is the case. As a result, the total number of people affected by noise at night between 2300 and 0600 with the Project will be less than in the 2019 baseline (due to the future baseline otherwise providing quieter conditions due to fleet modernisation).</p> <p>The Project does not propose any increase in the numbers of flights in this core period, and this will remain regulated by the DfT. To ensure this is secured the</p>

Topic	Matter Raised	Applicant's Response
	<p>to Covid. These are based on my regular monthly analyses which are widely circulated and emanate from official Eurocontrol figures.</p> <p>Appendix 1A compares, on a monthly basis, the aggregate number of movements over each of the last twelve months and compares them with the similar monthly figures pre-Covid. It will be noted that in aggregate over this period of 12 months, Gatwick's overall traffic is only 90% of its pre-Covid traffic. Indeed, in the last two months, the recovery level has dropped to 85%.</p> <p>This lack of full recovery, as also referred to in my First Deadline 1 Submission, may suggest that, for the variety of reasons I have previously outlined, Gatwick's Traffic growth forecasts may be optimistic.</p> <p>Appendices 1B and 1C focus on the levels of Night Period Movements – both for arrivals and departures. I have identified the periods of core Night Movements (2330-0600) where there is a formal agreed limit set by the DfT for both the Summer and Winter Periods. These limits can be and regularly are breached through the use of dispensations granted by the airport and subsequently approved by the regulator.</p> <p>Notwithstanding the lower number of flights in 2023/24 as against the equivalent months preCovid, it can be seen that the aggregate numbers of arrivals during the night period have increased and that these increases are even more pronounced during the 'small hours' of between midnight and 0300.</p> <p>As regards the comparison of departures as between pre and post-Covid, it is again notable that there was a material increase in movements between 0530 and 0559, which is of course within the core Night Period, again notwithstanding the reduction in total actual flight numbers.</p> <p>One is concerned that Gatwick could be interpreted as being somewhat complacent in allowing airlines to increase the number of flights during the core Night Period. It is thus a matter of concern that should the overall number of flights increase, there will be even greater numbers of night movements. We would thus wish that, should the DCO application be approved in some form, attention should be given to better capping and indeed a substantial reduction in allowable Night Movements.</p> <p>While it could be argued that this matter is the subject of a separate consultation by the DfT, it is understood that DfTs present position is simply to</p>	<p>Northern Runway Project proposal includes specific further mitigation measures to reduce night noise, including not operating the Northern Runway at night between 2300 and 0600 unless required to facilitate maintenance or other work, as currently is the case, Requirement 19(3) in Schedule 2 to the Draft Development Consent Order (Doc Ref. 2.1)</p> <p>Aircraft operating in the core night period are limited by summer and winter seasonal air traffic movement limits and are also given a "Quota Count" (QC) score dependent on engine fit and weight, and the quota points used are counted against permitted seasonal quota limit totals. The noisiest types of aircraft with QC 8 and 16 may not operate at night (between 2300 and 0700 local time) and QC 4 aircraft may not be scheduled in the core night period.</p> <p>The night flight restrictions regime allows for some flexibility permitting the 'carry over' of a portion of unused night quota and movements from winter season to summer season, and also scheduling penalties if the number of flights or quota limits in a season are exceeded. The night noise restrictions also contain provisions to disregard movements from the air traffic movement limit (known as dispensations). Dispensations are permitted for specific reasons, for example aircraft or health emergencies; widespread and prolonged air traffic disruption and delays as a result of disruption leading to serious hardship and congestion at the airfield or terminal.</p> <p>London Gatwick has in place an air traffic management and airfield infrastructure modernisation programme, including projects such as Reduced Departure Separation, Time-Based Separation on arrival and the recent completion of a new optimally sited Rapid Exit Taxiway (RET), targeted at enhancing resilience. The airport is also collaborating with airlines and business partners to further enhance operational efficiency.</p> <p>Plans to bring the northern runway into routine use is a crucial component of Gatwick's plans to further improve our operational performance. If approved, the NRP would decongest the existing single runway operation, significantly improving the airport's capacity and resilience. By doing so, Gatwick anticipate (and have shown through modelling) a reduction in airport-induced delays, contributing to an overall improvement in operational performance.</p>

Topic	Matter Raised	Applicant's Response
	roll forward the existing regime pending the determination of the DCO. It is therefore considered that the Inspectors have the opportunity of addressing the Night Flight regime in their determinations	

101 Sabine Coldrey

101.1.1. Table 101.1 sets out the Applicant's response to the matters raised in the Written Representation from Sabine Coldrey [REP1-260]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 101.1 Response to Written Representation from Sabine Coldrey

Topic	Matter Raised	Applicant's Response
General	Adverse impact on environment: increased carbon emissions, more air pollution, increase of local flood risk	The Applicant has provided a response to general concerns regarding the impacts of the Project on greenhouse gases, air quality and flood risk at Sections 4.16, 4.3 and 4.27, respectively, of the Relevant Representations Report [REP1-048].
Noise and Vibration	Noise pollution currently a significant problem would become worse with more flights	The Applicant has provided a response to general concerns regarding the impacts of the Project on noise at Section 4.22 of the Relevant Representations Report [REP1-048].
Surface Transport	Infrastructure struggling as it is, the new road layout only helps the terminals but not the surrounding areas that would need to cope with significant extra traffic, no improvement to rail link included in plans, there is no safe local cycle paths network that would encourage commuting by bike.	<p>The Applicant has provided a response to general concerns regarding the impacts of the Project on traffic and transport at Section 4.26 of the Relevant Representations Report [REP1-048]. Section 4.2 of the report also provides responses to comments made regarding the active travel network.</p> <p>Section 5.2 of ES Chapter 5: Project Description [REP1-016] summarises the active travel proposals for the Project. These proposals are illustrated in Figure 12.6.2 as part of the ES Traffic and Transport Figures [APP-059], and ES Appendix 5.2.1 Surface Access General Arrangements Plans [APP-076].</p> <p>The measures included in the final design proposals are expected to lead to a range of benefits for active travel users on key routes to and from the airport with improved connectivity and safety. The active travel infrastructure included in the proposed highway works would create an additional route through Gatwick Airport together with National Cycle Route 21. These routes are expected to increase the attractiveness of active travel for the surrounding area.</p> <p>Significant improvements for active travel users are proposed at Longbridge Roundabout with facilities becoming predominantly segregated including the</p>

Topic	Matter Raised	Applicant's Response
		<p>introduction of a parallel toucan crossing and providing improved onward connectivity to Riverside Garden Park and North Terminal Roundabout.</p> <p>The existing footway on the eastern side of A23 London Road to the south of the proposed shared use ramp is proposed to be widened. The newly proposed segregated route between Longbridge roundabout and North Terminal will provide a direct connection into the Airport for residents north of the Airport. It will be illuminated by street lighting and benefit from passive surveillance from the adjacent Car Park.</p> <p>The section of active travel route from North Terminal to South Terminal would include signalised crossings and the route is proposed as shared use. GAL is also exploring further improvements of NCR21 in the vicinity of South Terminal, to be delivered at a later date (either as part of the Project or as a separate scheme).</p>

102 Safe Landing

102.1.1. Table 102.1 sets out the Applicant's response to the matters raised in the Written Representation from Safe Landing [\[REP1-261\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 102.1 Response to Written Representation from Safe Landing

Topic	Matter Raised	Applicant's Response
Socio-Economics	We're worried about the economic risk to workers' livelihoods if our industry leaders plan for a massive growth in flights, which is incredibly unlikely to materialise – and then continue – as climate impacts accelerate. First and foremost, we care about protecting the jobs and skills of the future. We want an industry that is sustainable in the long-term, not one propped-up on false assumptions that will fail us again – as with Covid – and lead to a fresh round of redundancies, later this decade. We believe that there is a high risk of Gatwick Airport spending the rest of the decade building excess air traffic capacity at the airport, which will prove to be unusable next decade as we are unable to stay within our carbon budget. This will lead to a bad return on investment for the expansion, and predictable associated loss of jobs.	The Applicant has responded thematically to comments made within relevant representations regarding job security and jobs created by the project at Section 4.25 of the Relevant Representations Report [REP1-048] .
Greenhouse Gases	We're concerned about the trajectory of our sector. In particular, the growth of air travel, and what this means for greenhouse gas emissions, global warming and climate change. We see the current projected growth as unrealistic, given the necessity for future regulations to limit air traffic growth in order to reduce aviation emissions. This opinion has been formed from many years of detailed	The uncertainty around the rate at which technological opportunities to reduce the impacts of aviation is recognised. The UK Government responded directly to the 2022 Climate Change Committee recommendation in its Government Response of March 2023, stating:

Topic	Matter Raised	Applicant's Response
	<p>examination of all technology, fuel and policy options proposed by our industry. To be clear: there is no aircraft technology or alternative jet fuel that will be available at scale, in time to reduce aviation emissions at the necessary rate.</p> <p>Even without the application of legally-binding carbon budgets resulting in enforced limits on air traffic, it's likely that demand projections for air traffic growth are flawed. This is due to economic reasons and the high likelihood of the price of air fares rising substantially as a result of any decarbonisation scenario. This is due to the fundamentally high cost of alternative jet fuels (such as advanced biofuels or electro-fuels) or burning kerosene and running negative emissions technologies to re-capture the carbon. For example, the cost of carbon removal is estimated in the multiple hundreds of pounds, e.g. \$600 per tonne of CO₂ [3], compared to the current (often voluntary) cost to airlines of offsetting emissions under the CORSIA scheme which is estimated to only cost between 70 cents and \$12 up to 2035.</p> <p>A recent paper examines the economic issues, highlighting the massive costs for decarbonising aviation, highlighting that to “stay within 1.5 °C warming, the sector has to reassess capacity and its relationship with profitability”. It concludes that “limiting growth is of relevance regarding the availability and scalability of alternative fuels, as well as the overall transition challenge in terms of fuel requirements, it is argued that a carbon tax reflecting on the cost of emissions needs to be introduced. The overall effect is that the transition to net zero becomes more credible and achievable, though it comes at the cost of curbing growth rates.”</p> <p>We're particularly concerned by the expansion plans of many airports around the UK. These assume business-as-usual air traffic growth across the 2020s & 2030s, in a similar fashion to the rapid growth that occurred across the 2010s. However, we're in a position where the climate science and climate action required is incredibly clear: we need year-by-year degrowth in emissions across all sectors of the economy. This necessitates that we fundamentally transform how we travel, and how we fly. Our group includes many specialists who have worked on the cutting-edge technology that will emerge over the next few decades, and it's very clear to us that technology and fuels alone won't deliver a 1.5°C-consistent emissions reduction pathway. We fully anticipate future policies and regulations that will mean we fly less far, less fast and less frequently.</p>	<ul style="list-style-type: none"> • <i>“197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our ‘high ambition’ scenario has residual emissions of 19 MtCO₂e in 2050, compared to 23 MtCO₂e residual emissions in the CCC’s Balanced Pathway.</i> • <i>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</i> <p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • <i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022.</i> • <i>The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</i> • <i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK’s overall 2050 net zero target.”</i>

Topic	Matter Raised	Applicant's Response
Forecasting: Growth Plans	<p>This transformation is likely to result in a reduced number of longer-range flights, made in large conventional jet airliners, as this expansion at Gatwick is planned to accommodate. It is also likely to result in a greater number of shorter-range flights made in smaller, unconventional aircraft, e.g. “zero emissions” electric- or hydrogen-powered aircraft. However, these aircraft concepts are still in very early stages of design and development, and there are many significant design challenges which are likely to place severe restrictions on the capabilities of future aircraft. The airport infrastructure being proposed at Gatwick, and elsewhere, is wholly inconsistent with a significant uptake of such aircraft. For instance, all credible “zero emissions” electric- or hydrogen-powered aircraft being developed today are regional propeller-driven aircraft with far lower passenger capacities e.g. 50 passengers, rather than the 150-200 passenger capacity aircraft which tend to currently fly from Gatwick, and which the terminal and gate layout of this latest airport expansion is configured to accommodate. For example, Airbus has stated recently that its hydrogen-powered aircraft under development “will start small and avoid competing with its other aircraft models”. ZeroAvia’s product, the ZA2000, which they hope to certify and launch within the next decade is a 40-80 seat regional turboprop. Universal Hydrogen’s initial product is a 40 passenger De Havilland Dash 8 turboprop.</p> <p>We therefore warn Gatwick about the risk of stranded-assets for public and private finance if the wrong infrastructure is built, and would encourage all stakeholders to consider the benefits of putting expansion plans on hold until the future of air travel is better understood. This is not only in the best interests of the planet, but also of aviation workers who rely on sustainable investment decisions being made, to ensure a future of long-term, sustainable employment. We are concerned that if Gatwick Airport goes ahead with its Northern Runway proposals, it will waste significant financial resources and time. It should instead hold off on expansion planning until there is more certainty regarding the future of aviation, and in the meantime direct efforts towards future-proofing the airport and associated jobs, for the necessary transformation of air travel.</p>	<p>The aviation demand in the London system is forecast to exceed capacity and additional capacity is required urgently to maintain the UK’s global connectivity. If airports were to wait for the future fleet requirements to be fully understood this would add significant delay to delivering the much needed capacity in the London system.</p> <p>London Gatwick has the capability to adapt the apron design to accommodate changing fleet requirements as it has done previously to adapt to the growth in widebody fleet. Many of Gatwick’s apron areas operate as multi criteria aprons, including Pier 4 and Pier 5, this is where the apron can be operated in multiple different configurations to suit the traffic requirements throughout the day. The same methodology can also be used to adapt to future fleet requirements.</p> <p>It is assumed that the aircraft will be able to use the exiting taxiway and runway infrastructure, this is a reasonable assumption given the constraints at airports and commercial viability of the future fleet designs. This also aligns with work taking place with airline manufacturers.</p> <p>In reference to the public finance requirements, Gatwick Airport is privately owned and no taxpayer money would be used to finance this Project. The Project would be financed through a blend of debt, equity and airport charges.</p>

103 Salfords and Sidlow Parish Council

103.1.1. Table 103.1 sets out the Applicant’s response to the matters raised in the Written Representation from Salfords and Sidlow Parish Council [\[REP1-262\]](#) and the appended - Analysis of Motor Vehicle, Cycle and Pedestrian Movements [\[REP1-263\]](#) Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 103.1 Response to Written Representation from Salfords and Sidlow Parish Council

Topic	Matter Raised	Applicant's Response
Surface Transport	<p>Examine contribution by GW & NR on any obstacles facing GWR in increasing their Reading – Gatwick North Downs Line train services that could further remove or decrease M25 vehicle traffic and GWR's current early morning train services for passengers departing from Gatwick on early flights from 6.00am</p> <p>Surface Transport; the previous examination session did not examine road transport serving the airport; this includes local bus services to and from the Airport, variants in frequency and offer of bus services in the mid to late evening for late evening/night time flight arrivals and departures, longer distance coach services and the associated handling facilities for them and local taxi services from the Airport plus negative effects on our local roads capacity if the DCO, if granted, achieves the commercial success that Gatwick expects.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding road traffic and rail passenger demand at 4.26.1 of the Relevant Representations Report [REP1-048].</p> <p>The need for early morning and evening services is already recognised by GAL and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment [AS-079], as well as the benefit of strengthening weekend services. GAL has worked with Metrobus to develop an extensive, 24-hour, local bus network. The Applicant routinely liaises with public transport operators to explore service improvements, whether separately or as part of discussions with the Transport Forum Steering Group and wider Gatwick Transport Forum. ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] sets out the mode share commitments and the commitments to improving access to the airport. This includes funding for bus and coach services as set out in Paragraph 5 of Schedule 3 to the draft Section 106 Agreement [REP2-004], which will secure a minimum £10 million investment from the Applicant to support the introduction or operation or use of bus and coach services.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and ES Chapter 12: Traffic and Transport [AS-076]. The assessment includes committed increases in frequencies in the future baseline. The assessment shows no significant increase in crowding on rail services is expected as a result of the Project and no funding is required to mitigate the impact of the Project on rail services.</p>
Capacity and Operations	<p>We request that the proposed session to examine Noise Envelopes takes into account the current debate on Air space route changes especially Route 4 that overflies our Parish. Please see below on Route 4 matters that sets out the Route 4 position from our Parish's perspective:</p> <p>In 2013 NATS published their 'Airspace Change Proposal (ACP) Gatwick PRNSAV SID replications consultation' "to implement P-NAV replications of all SID routes from Gatwick Airport's main runway. . ."</p> <p>The ACP outcome for Route 4 brought aircraft south of where they had been and over parts of both Salfords and Sidlow villages that were not previously overflown. A letter from then CAA Director, Mark Swan, recognises²⁵⁸, what he calls a discrepancy, appears to have existed where the ground track doesn't correlate with the NPR centreline. He suggested one cause for this could have</p>	<p>Section 4 of ES Chapter 14: Noise and Vibration [APP-039] and Capacity and Operations Summary Paper [REP1-053] explain the Project does not require the routings of aircraft to or from the airport to be changed (see CAA airspace change proposal ACP-2019-81). London Gatwick's current airspace design includes Standard Instrument Departures (SID) and arrival procedures for both the 26L/08R (main) and 26R/08L (northern) runways.</p> <p>The airspace structures currently in place that service London Gatwick are legally constituted and comply with relevant international and UK aviation safety standards. Changes to airspace follow a regulated process (CAP 1616), the environmental aspects of which are set out in a statutory set of rules known as the altitude-based priorities (described in the Air Navigation Guidance 2017).</p>

Topic	Matter Raised	Applicant's Response
	<p>been 'magnetic variation changes not being incorporated over the intervening years'.</p> <p>Ever since the new Route 4 was approved, S&SPC have argued this was wrong. It did not replicate the SID and it should revert to where it was prior to the NATs consultation.</p> <p>We were not alone and failure to achieve this led, independently, to the formation of Plane Justice (PJ) who were supported by various residents and bodies, including S&SPC.</p> <p>PJ sought to have Route 4 revert to the pre-2013 route but the CAA/Gatwick Airport refused which led to PJ applying for a Judicial Review. When consent for the Judicial Review was allowed the CAA conceded its April 2017 decision making the, by-then, Gatwick departure Route 4 permanent was wrong and it should be quashed.</p> <p>PJ explained the CAA was found to be wrong to ignore existing patterns of traffic and the value of leaving the Route in its 2012 location, wrong because the failed to require Gatwick to consult on the design of the Route that was introduced in May 2016 and wrong in saying that magnetic drift was a sufficient reason to move the Route, as their quashed decision had asserted.</p> <p>A Gatwick blog dated 12 July 2019 says: - "<i>. . . the CAA recently instructed Gatwick to review the conventional Standard Instrument Departures (SIDs) for Route 4 as part of the recently initiated airspace change. . .</i>"</p> <p>S&SPC reads this to mean that, following the Judicial Review, Gatwick was required to review the Route 4 SIDs.</p> <p>The blog says, further down: - <i>"Given the drawn out and already complicated recent history of Route 4 departures, undertaking a further ACP at this stage would create significant confusion to local residents and stakeholders. It has taken two years to get to this point and integrating this conventional ACP into our ongoing airspace change also risks delaying the current process and has the potential to generate understandable frustration among local communities looking for a swift resolution to this matter."</i> <i>"What happens now?"</i> <i>After careful consideration, Gatwick has decided not to carry out the requested</i></p>	<p>Specifically in relation to the issue of a previous Route 4 airspace change, an airspace change decision by the Civil Aviation Authority (CAA) on the Route 4 SID routes was quashed following a successful judicial review, with the context provided below.</p> <p>During the process of responding to litigation on a Route 4 airspace change the CAA discovered that the historical changes (circa 1999) to the conventional departure route were not entirely for the reasons originally conceived. The formal notification issued to the Applicant by the CAA is available to read online. The letter states that 'it became apparent that magnetic drift was not the predominant factor causing displacement of the Route 4 SIDs from the Noise Preferential Route (NPR). The CAA considered that it could not allow its decision to stand where such a decision was based upon a misunderstanding of the relevant facts.'</p> <p>Because this information was not previously available (to either the CAA or the Applicant), the CAA considered that the Applicant could not have conducted a proper consultation at that time, and thus it could not allow its decision to stand resulting in the withdrawal of the routes that had been introduced and the historic conventional routes being reinstated.</p> <p>Following the outcome of the judicial review, Route 4 was returned to its previous flight path which remains the route flown today.</p>

Topic	Matter Raised	Applicant's Response
	<p><i>review and to instead remain focussed on the current ACP on RNAV Standard Instrument Departures. We expect that our decision not to review the conventional SIDS will allow the CAA to draw to a close the 2012 airspace change on Route 4. It would also decouple entirely the two ACPs – making the current Route 4 process more straight forward.</i></p> <p><i>Following a CAA decision on this matter, we anticipate that in due course we will be required to remove the published temporary Route 4 RNAV SIDs currently in place. Airlines will continue to fly Route 4 departures but will need to produce their own flight management system coding pending the completion of the ongoing Route 4 airspace change process; it is not possible to quantify what changes to the flight path that aircraft currently follow will result and the timing of the removal will be determined by the CAA.</i></p> <p><i>It remains our ambition that we can develop and implement new Route 4 RNAV Standard Instrument Departures in the first half of 2021. We believe that, in conjunction with changes enabled by airspace modernisation260260, Route 4 departures should create less impact on communities. Full details of all our airspace changes can be found on the CAA's airspace change portal; just enter 'Gatwick' into the search function."</i></p> <p>The above shows Gatwick Airport chose not to “carry out the requested review” not least because this required “undertaking a further ACP” and, for the other reasons given in the blog. We, S&SPC, have asked CAA to let us know where they believe the legal route of Route 4 is now</p>	
<p>Surface Transport: Report: Analysis of Motor Vehicle, Cycle and Pedestrian Movements – A23/Cross Oak Lane/Hoadley Road, Horley</p>		<p>The Applicant notes the report appended to the representation, which contains traffic count information from a number of different years, but it is not clear whether the Parish Council is inferring any specific conclusion from the report. The strategic highway model used in the assessment of the Project includes this part of the A23 together with a much wider area of the network and was calibrated and validated to observed data in accordance with DfT Transport Appraisal Guidance. It therefore provides a consistent basis on which to forecast future year conditions with and without the Project.</p>

104 Sally-Lynne Andrews

104.1.1. Table 104.1 sets out the Applicant's response to the matters raised in the Written Representation from Sally-Lynne Andrews [\[REP1-264\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 104.1 Response to Written Representation from Sally-Lynne Andrews

Topic	Matter Raised	Applicant's Response
Noise and Air Quality	I wish to complain about the proposed extension of the current runway to Gatwick airport on the grounds of: 1- noise and air pollution	The Applicant has responded thematically to comments made within relevant representations regarding noise and air quality at Sections 4.22 and 4.3 (respectively) of the Relevant Representations Report [REP1-048] .
Traffic and Transport	2- disruption to the already overloaded public roads and services in our green belt area 3- Excessive traffic and lack of legitimate parking	The Applicant has responded thematically to comments made within relevant representations regarding congestion and off-site parking at Section 4.26 of the Relevant Representations Report [REP1-048] .
Greenhouse Gases	4- Unnecessary increase in flights when there is no need which would cause more unnecessary pollution	The Applicant has responded thematically to comments made within relevant representations regarding greenhouse gases at Section 4.16 of the Relevant Representations Report [REP1-048] .
Ecology and Natural Conservation	5- Concerns for wildlife in the area	The Applicant has responded thematically to comments made within relevant representations regarding ecological impacts at Section 4.13 of the Relevant Representations Report [REP1-048] .
Health and Wellbeing	6- The welfare and well-being of local people who live within the area, which would include increase in road traffic, air traffic, noise pollution, air pollution, damage to the infrastructure of our green belt.	The Applicant has responded thematically to comments made within relevant representations regarding the impacts of the Project on health and wellbeing at Section 4.17 of the Relevant Representations Report [REP1-048] .

105 Sarah Butler

105.1.1. Table 105.1 sets out the Applicant's response to the matters raised in the Written Representation from Sarah Butler [\[REP1-265\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 105.1 Response to Written Representation from Sarah Butler

Topic	Matter Raised	Applicant's Response
Noise	I live under the flightpath to Gatwick – and though I am 20 miles from the airport – I am seriously affected by noise from incoming planes, especially at night. They keep me awake, and when I do sleep, they wake me. I've lived here for almost 30 years and noise from night flights now significantly affects my health. This isn't helped by night flights being entirely unnecessary – there is no justification for them apart from profit. Doubling flight numbers would have an appalling effect on the health of many, many people.	The Applicant has responded thematically to comments made within relevant representations regarding existing aircraft noise at Section 4.22 and the impacts of the Project on health and wellbeing at Section 4.17 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	I am also deeply concerned about the environmental impact of expanding Gatwick as it would massively increase emissions of CO2, and with no realistic technological alternatives to current aviation fuels in sight, increasing flight numbers in the way that Gatwick plans will have an extremely negative impact on the UK's commitment to reducing carbon emissions and avoiding climate breakdown.	The Applicant has responded thematically to comments made within relevant representations regarding greenhouse gas emissions at Section 4.16 of the Relevant Representations Report [REP1-048] .
Needs case and socio-economics	<p>No one needs an expanded Gatwick: the only people who will benefit are the owners and shareholders. Local people will be landed with transport chaos. Local businesses will have to compete for workers in an area where housing and infrastructure are already at their limit.</p> <p>Gatwick does not serve the business community: almost all its flights are for holidays. I'm not against flying for a once-a-year holiday but as we try our hardest to reduce our dependence on high-carbon travel, we cannot logically allow the expansion of an airport that encourages frequent short-haul flights. As a nation we must make it easier for people to travel by lower carbon means (trains, buses) and planning policy has to reflect this. The UK has, after all, made a legal commitment to reducing carbon emissions. Allowing Gatwick to expand would fly in the face of this.</p>	The Applicant has responded thematically to comments made within relevant representations regarding the needs case for the Project, and the associated socio-economic impacts at Sections 4.21 and 4.25 (respectively) of the Relevant Representations Report [REP1-048] .

106 Sarah Dawe

106.1.1. Table 106.1 sets out the Applicant's response to the matters raised in the Written Representation from Sarah Dawe [\[REP1-266\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 106.1 Response to Written Representation from Sarah Dawe

Topic	Matter Raised	Applicant's Response
Criticisms of modelling and environmental assessments	<p>The worst case for environmental impact of surface transport, noise, air pollution and climate change should be assessed:</p> <ul style="list-style-type: none"> • Increase from 40.9m in 2023 to 80.2m in 2047 is an increase of nearly around 39 million passengers per annum (mppa). • Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, just 1/3 of this increase. 	The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment [APP-031] , and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42 as set out in the response to Ben Benatt at Section 9 of this document.

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> Environmental Assessment guidance is that assessment should be against the realistic worse case. This has not been done. The modelling, scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen. 	
Surface Transport	<p>Future environmental and local impacts should be no worse than now:</p> <ul style="list-style-type: none"> GAL should model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere. Local traffic congestion and parking impacts in and around Gatwick should not be worse. As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality 	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and rail impacts, at Section 4.26 of its Relevant Representations Report [REP1-048]. On the query on luggage space, the Applicant has provided a response in Appendix C (Rail Passenger Modelling Clarification Note) of The Applicant's Response to Actions from ISH2-5 [REP2-005].</p> <p>The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of The Applicant's Written Summary of Oral Submissions from ISH4 Surface Transport [REP1-059].</p>
General	<p>The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated:</p> <ul style="list-style-type: none"> No night flights Stronger noise limits and mitigation scheme. Address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. 	<p>Noise</p> <p>Please see the information provided in the Relevant Representations Report [REP1-048] Table 4.22.1 in response to the generic comment <i>Concern about the current impact of noise from the airport, including night flights.</i></p> <p>The Project includes a series of noise mitigation measures including an enhanced noise insulation scheme that addresses all areas affected by aircraft noise in the future case with the Project regardless whether the project itself would increase those noise levels and as such addresses the total noise effect the airport not only that of the Project.</p> <p>Water Quality</p> <p>The Applicant has demonstrated in ES Chapter 11: Water Environment [APP-036] and ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment [APP-145] that with the increased capacity provided by the new treatment facility mitigates the increased risk of potentially de-icer contaminated water being discharged into receiving watercourses. The treatment facility would also reduce the discharge from the pollution storage lagoons into Thames Water's Crawley Sewage Treatment Works (STW). A schematic of the proposed contaminated water path for the airfield is included as ES Water Environment Figures [APP-</p>

Topic	Matter Raised	Applicant's Response
		<p>057] Figure 11.8.1. The treatment system is designed to achieve the tightest Technically Achievable Limits, therefore the effluent will be better quality than the current discharge through Crawley STW.</p> <p>The facility would require a new Environmental Permit for discharge and a Flood Risk Activity Permit from the Environment Agency, as indicated in the List of Other Consents and Licenses [APP-264].</p> <p>The HEWRAT assessment ES Appendix 11.9.3: Water Quality HEWRAT Assessment [APP-144] demonstrates that through the provision of attenuation and treatment ponds and other SuDS measures the Project's surface assess highways improvements will not result in a degradation of water quality in receiving watercourses.</p> <p>ES Appendix 11.9.2: Water Framework Directive (WFD) Compliance Assessment [APP-143] has been carried out to assess all aspects of the Project that have the potential to impact relevant water bodies within the Project boundary. Section 4 of ES Appendix 11.9.2: Water Framework Directive Compliance Assessment [APP-143] identifies that implementation of the drainage strategy has an overall positive impact on the relevant watercourses, although given the size of the designated waterbodies, this may not be enough to change status of the chemical and physio-chemical or specific pollutant quality elements. The assessment concludes that potential impacts of the Project, and considerations of the proposed mitigation measures, such as those included within the improved drainage strategy, do not have the potential to cause deterioration in status of the individual quality elements and therefore overall status of any of the relevant water bodies. Further it has been concluded that potential impacts of the Project including considerations of the proposed mitigation measures outlined, do not have the potential to cause deterioration in status of individual quality elements and therefore overall status of any of the relevant water bodies.</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The</p>

Topic	Matter Raised	Applicant's Response
		<p>mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline, Applicant's Response to ExQ1 (Doc Ref.10.16).</p> <p>In accordance with national planning guidance the risk to, and impact from the Project has been assessed for all sources of flood risk as reported in ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The FRA demonstrates that through the provision of a number of mitigation measures (see Section 7 of the FRA) the Project would not increase flood risk to other parties for its lifetime, taking the predicted impact of climate change into account. Figures 7.2.3, 7.2.4, 7.2.5 and 7.2.6 in the FRA indicate the Project would not increase flood depths to other parties including those downstream. As an example the hydrograph included as Figure 2.1 demonstrates no increase to peak flows in the River Mole downstream of the Project for the Credible Maximum Scenario.</p>
Section 106 Agreement	<p>Gatwick must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts – as part of a new Section 106 agreement, regardless of whether the airport is expanded or not. This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.</p>	<p>The ES Appendix 5.2.3: Mitigation Route Map [REP2-011] sets out the mitigation measures that are required to mitigate the impacts of the Project and how those measures will be secured: either through the draft DCO, s106 Agreement or other consents and licences.</p> <p>The DCO s106 Agreement will only apply to the airport in the event that the DCO is granted and then implemented. The Applicant is in discussions with Crawley Borough Council and West Sussex County Council about a new s106 Agreement that would apply to the airport following the expiration of the 2022 Agreement and prior to the DCO s106 Agreement taking effect.</p>
Climate Change and Greenhouse Gases	<p>Climate change is a significant impact, and should be addressed.</p> <ul style="list-style-type: none"> Gatwick must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact. 	<p>The Applicant has responded thematically to comments made within relevant representations regarding climate change and greenhouse gases at Sections 4.6 and 4.16, respectively, of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true. There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should not be supported on climate grounds alone 	

107 South Downs National Park Authority

107.1.1. Table 107.1 sets out the Applicant's response to the matters raised in the Written Representation from the South Downs National Park Authority [REP1-267]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 107.1 Response to Written Representation from the South Downs National Park Authority

Topic	Matter Raised	Applicant's Response
Policy	<p>It does not appear that the application has had any regard to the SDNP's Statutory Purposes or the Special Qualities for which the National Park has been designated. The National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995, sets the following statutory purposes and duty for National Parks:</p> <ol style="list-style-type: none"> To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public. <p>The SDNPA also has a duty when carrying out these statutory purposes:</p> <ul style="list-style-type: none"> To seek to foster the economic and social well-being of the local communities within the National Park. <p>In addition, under Section 11 of the National Parks and Access to the Countryside Act 1949, recently amended by Part 12, Section 245 (3) of the Levelling Up and Regeneration Act 2023, there is a duty placed on any relevant authority, such as the Planning Inspectorate, in carrying out their</p>	<p>The Applicant has responded to issues raised by the National Park Authority at Section 3.73 of the Relevant Representations Report [REP1-048].</p> <p>There it is explained that ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] assesses impacts on the Park having regard to a number of matters, including CAA guidance (CAP1616 Appendix B, para B30 and B56). The frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of the ES Landscape, Townscape and Visual Resources Figures [REP2-007] together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>The Chapter concludes that an increase of up to 20% in overflights compared to the future baseline situation in 2032 would result in Minor Adverse effects on perception of tranquillity, which is not significant. <i>"The special qualities that people living within and visiting the South Downs National Park experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be apparent."</i></p>

Topic	Matter Raised	Applicant's Response
	<p>functions to 'seek to further' the purposes of the National Park. This ensures that relevant authorities take account of these purposes when coming to decisions or carrying out their activities relating to or affecting land within National Parks. It recognises that a wide range of bodies have a direct influence over the future of National Parks in terms of policy, project implementation, casework decisions, land ownership and management. It also acknowledges that the fulfilment of National Parks' statutory purposes rests not only with those bodies directly responsible for their management but that it also relies on effective collaborative working.</p> <p>Where there is a conflict between the statutory purposes, statute (section 11A(2) of the 1949 Act) requires any relevant authority, when exercising or performing functions which relate to or affect land in a National Park, to attach greater weight to the purpose of 'conserving and enhancing'. Giving priority to the first purpose of the National Park is known as the Sandford Principle.</p>	<p>Reference to the assessment within the ES would show it to be a thorough, detailed assessment which has taken care to understand local characteristics, including local policy and relevant studies. The statutory purpose and duty of the National Park are expressed cited (at para. 8.6.31); the special qualities of the Park are set out and an analysis is made of the South Downs National Park Authority's Tranquillity Study 2017, which identifies aircraft as one of 44 factors that impact tranquillity. The ES Chapter finds at paragraph 8.6.38: "<i>the data within the South Downs National Park Authority Tranquillity Study 2017 indicate that the presence of overflying aircraft is not a primary influence on the levels of tranquillity experienced within the National Park</i>".</p> <p>The NRP application does not involve the opening up of any new flight paths over the National Park and the existing flightpaths have been designated not by Gatwick, but by the CAA. Gatwick cannot change them but Gatwick does have policy support to make best use of its exiting runways as part of Government policy to meet the unmet need for increased aviation. Gatwick is located in a relatively rural area compared with other principal airports.</p> <p>Relevant guidance is provided to the CAA in the DfT's Air Navigation Guidance 2017 'Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management'. That Guidance explains:</p> <p><i>"3.31 National Parks and AONB are designated areas with specific statutory purposes to ensure their continued protection in relation to landscape and scenic beauty. The statutory purpose of National Parks is to conserve and enhance their natural beauty, wildlife, and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public. The statutory purpose of AONB is to conserve and enhance the natural beauty of their area. In exercising or performing any air navigation functions in relation to, or so as to affect, land in National Parks and AONB, the CAA is required to have regard to these statutory purposes when considering proposals for airspace changes."</i> (emphasis added)</p> <p>The Guidance then recognises that flightpaths may need to cross National Parks, as follows:</p> <p><i>"3.32 Given the finite amount of airspace available, it will not always be possible to avoid overflying National Parks or AONB, and there are no legislative</i></p>

Topic	Matter Raised	Applicant's Response
		<p>requirements to do so as this would be impractical. The government's policy continues to focus on limiting and, where possible, reducing the number of people in the UK adversely affected by aircraft noise and the impacts on health and quality of life associated with it. As a consequence, this is likely to mean that one of the key principles involved in airspace design will require avoiding over-flight of more densely populated areas below 7,000 feet. However, when airspace changes are being considered, it is important that local circumstances, including community views on specific areas that should be avoided, are taken into account where possible." (emphasis added)</p> <p>The National Park is an important consideration and Gatwick recognises that it is also important to assess and understand impacts on the National Park having regard to national and local policies and taking into account its statutory purpose. However, policy and guidance do not give it overriding protection relative to other areas.</p> <p>As the representations note, section 245 of the Levelling-up and Regeneration Act 2023 ("LURA") has amended the National Parks and Access to the Countryside Act 1949 (the "1949 Act"). S.245(3) of the LURA inserted after section 11A(1) of the 1949 Act the following provision: "<i>In exercising or performing any functions in relation to, or so as to affect land in any National Park in England, a relevant authority... must seek to further the purposes specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.</i> By section 5(1) those purposes are "<i>conserving and enhancing the natural beauty, wildlife and cultural heritage</i>" of National Parks and "<i>promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public</i>". The Secretary of State as the decision maker for the Project is a relevant authority and subject to this duty.</p> <p>The 1949 Act has also been amended by s.245(3) of the LURA to include Section 11(2A) which provides as follows: "<i>The Secretary of State may by regulations make provision about how a relevant authority is to comply with the duty under subsection (1A) (including provision about things that the authority may, must or must not do to comply with the duty).</i> However no such regulations have been made and there is as yet no government guidance on how the section 245 duty should be applied.</p>

Topic	Matter Raised	Applicant's Response
		<p>Similar provisions have been enacted in relation to AONBs: see section 245(6) of LURA amending section 85 of the Countryside and Rights of Way Act 2000 (the "2000 Act").</p> <p>If the grant of a DCO would affect land (directly or indirectly) within a National Park, the duty in section 11(1A) of the 1949 Act will be engaged in relation to the determination of the application for development consent. It should be noted however that it is duty to "seek to further" the statutory purposes. It is not a duty to further those purposes. The words "seek to" mean that a Minister must try to further those purposes when determining an application for a DCO that would affect land within a National Park. They have been used deliberately to qualify this duty. Compliance with the duty does not mean that the Secretary of State must achieve a furthering of those purposes in every case, or that any decision must avoid causing adverse effects to a National Park. The duty does not require that any decision should "best" further those purposes, or that it must adopt all measures which are theoretically available to further them.</p> <p>The Applicant is aware of guidance issued by Natural England in other transport projects that states as follows:</p>

- “- *the duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered;*
- *The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose;*
- *The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England’s view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory management plan. The relevant protected landscape team/body should be consulted.”*

It should also be recognised that the duty is a general one and needs to be applied in the context of the relevant function being exercised. As the ANPS recognises (paragraph 4.9), requirements should only be imposed on a DCO where these are “necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects” (see too the guidance on planning obligations at paragraph 4.10).

The Environmental Statement ("ES") included the South Downs National Park within the wider study area and considered that the landscapes within these designated areas are relevant to the assessment of land and visual effects. The Project is located outside the National Park. As such, there is no direct impact on the National Park as a result of the Project. **ES Chapter 8: Landscape, Townscape and Visual Resources** [[APP-033](#)] considered potential impacts on the South Downs National Park by reference to a Tranquillity Assessment which assessed effects on the perception of tranquillity at identified locations, at Petworth House, Temple of the Winds, Ditchling Beacon and Firle Beacon. The increase in overflying aircraft at less than 7000 ft above local ground level would range from 6% to 16%, which equates to only between 0.2 and 1.8 aircraft a day against a total baseline without the Project of between 2.3 and 12.8 overflights a day (see Table

Topic	Matter Raised	Applicant's Response
		<p>8.9.1). Half of the overflights are attributable to non-Gatwick traffic. This would result in a negligible change and only minor adverse effects (see paragraphs 8.9.202, 8.9.292-3 and 8.9.371-2).</p> <p>Natural England have agreed in the Statement of Common Ground Between Gatwick Airport Limited and Natural England [REP1-037], that the increase in overflights in the South Downs National Park is negligible and will not require any mitigation measures.</p> <p>In this context, the Applicant considers that having regard to the nature of the Project and its implications for the National Park as demonstrated through the assessment summarised above, there are no reasonable additional measures that could be sought in accordance with paragraphs 4.9 and 4.10 of the ANPS to further the statutory purposes. The same conclusion applies to impacts on perceived tranquillity of the AONBs which are assessed in similar terms within ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] of the ES (see paragraphs 8.9.197-201, 8.9.291-4 and 8.9.371-2). As a result, the Secretary of State can grant the application for the DCO on a basis which is consistent with the duties in section 11(1A) of the 1949 Act.</p>
Tranquillity	<p>Tranquil and unspoilt places are a special quality of the SDNP – an important commodity in the densely development South-East of England. The South Downs National Park Authority (SDNPA) considers the applicant has not adequately demonstrated that the relative tranquillity within the SDNP would not be harmed, or that mitigation to prevent potential harm would be appropriately secured. There would be an impact on relative tranquillity as a result of overflights – to the SDNP as a whole and over key sites including Petworth Park and Ditchling Beacon. The Landscape and Visual Impact Chapter of the Environmental Statement advises that there would be a minor adverse effect on the perception of tranquillity, based on there being an increase of 2 flights per day over either the central and/or eastern part of the National Park. There is no mechanism to control or limit the number of flights per day and this figure seems extremely low in relation to the overall increase in flights that would be enabled by the proposed development.</p>	<p>The Applicant has responded to this specific point by the South Downs National Park Authority regarding tranquillity at Section 3.73 of the Relevant Representations Report [REP1-048].</p>
Dark Night Skies	<p>The SDNP is designated as an International Dark Night Skies Reserve. More overflights above the SDNP will make it more difficult to view an authentic night sky. Increased contrails are also a potential concern – albeit a matter of debate. Contrails from overflights can disperse and create thin layers of clouds across the sky. The impact would be dependent on weather conditions, but an</p>	<p>The Applicant has responded to this specific point by the South Downs National Park Authority regarding dark skies at Section 3.73 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	increase in flights (day or night) will increase the likelihood of contrails forming. When these clouds form, they reflect surface illuminations (as any cloud would do) and brighten the sky. These clouds tend to appear very translucent to the eye, but a Sky Quality Meter (SQM) detector would show a reduction in sky quality if pointed towards these clouds. This would in turn cause damage to the quality of the Dark Skies and potentially impacting on the integrity of the designation. Both Petworth Park and Ditchling Beacon are within the 'Intrinsic Zone of Darkness' where the Milky Way would be visible.	

108 Steel James Horton

108.1.1. Table 108.1 sets out the Applicant's response to the matters raised in the Written Representation from Steel James Horton [\[REP1-269\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 108.1 Response to Written Representation from Steel James Horton

Topic	Matter Raised	Applicant's Response
General	I believe this scheduling is undemocratic as it conflicts with both local elections and potentially the general election. Many citizens across the country may find it challenging to participate fully in the democratic process and attend these hearings simultaneously. Therefore, I strongly urge for these dates to be reconsidered.	Noted. The Applicant does not decide the Examination timetable. This is a matter to be considered by the Examining Authority.
Congestion	Gatwick Airport is already operating beyond capacity, particularly during the summer months. Allowing further expansion could exacerbate congestion issues by increasing air traffic. If Gatwick is allowed to expand its slot capacity by 40% it is my concern Gatwick will sell more than 40% more slots. Leading us back to where we are now with an over crowded airport just with even more planes in the hold wasting fuel. Is there any way for Gatwick to have a limit of flights like Amsterdam Schiphol (AMS)? Would a 2 nd runway with traffic capped at current levels reduce emissions? (Less holding).	The Applicant has responded to Capacity and Operations at the Airport at Section 4.5 of the Relevant Representations Report [REP1-048] .
Climate Change	There is a pressing climate emergency, and the aviation industry must contribute to reducing carbon emissions. Simply relying on efficiency savings and tax breaks to drive growth is insufficient. Any expansion of Gatwick Airport should not be justified solely on economic grounds. If consent is granted for expansion, there should be a binding cap on aviation CO2 emissions to ensure accountability and mitigate environmental impact.	The Applicant has responded thematically to comments made within relevant representations regarding climate change and greenhouse gases at Sections 4.6 and 4.16, respectively, of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	<p>Climate change poses significant challenges that must be addressed in the Development Consent Order (DCO) process. LGW must acknowledge and take responsibility for the emissions generated by flights from the airport. Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. LGW's claims that the climate impact is "insignificant" are misleading and must be refuted with evidence-based assessments. How can LGW becoming the size of the UK's largest climate polluter be "insignificant"?</p>	
Future Baseline	<p>There is a notable failure from LGW to accurately assess the worst-case scenario for environmental impact. With the projected increase in passenger numbers from 40.9 million passengers per annum (mppa) in 2023 to 80.2 mppa in 2047, it's crucial to evaluate potential consequences comprehensively. Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, representing only one-third of the projected increase. However, Environmental Assessment guidance emphasizes evaluating impacts against the realistic worst-case scenario. It's essential that the modelling, scenarios, and actual impacts are compared to both the current situation and a future case without any increase in flights or passengers. This approach would provide a comprehensive assessment of the full impact of Gatwick's expansion, ensuring that future environmental and local impacts are no worse than the present condition.</p>	<p>The Applicant's methodological approach to its Environmental Impact Assessment was explained in ES Chapter 6: Approach to Environmental Assessment [APP-031], and the baseline/future baseline conditions more specifically described in paragraphs 6.3.5 to 6.3.8 and 6.3.42.</p>
Surface Transport	<p>Gatwick Airport (LGW) should model transport scenarios that account for no growth in car usage and no exacerbation of overcrowding on the rail network, taking into consideration luggage space constraints. This would necessitate the introduction of new train services to and from the airport, potentially extending to connections between London and the South Coast. Given the current overcrowding on trains, where passengers often stand for over 20 minutes during peak times, addressing this issue is paramount to ensure efficient and comfortable transportation for passengers.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and transport at Section 4.26 of the Relevant Representations Report [REP1-048].</p>
Water Environment: Poor Quality of River Mole	<p>GAL must address the existing poor quality of the River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding. It's imperative to conduct thorough assessments and implement measures to mitigate any adverse effects on the river's water quality and ecosystem. Addressing these concerns is essential to safeguarding the health and integrity of the River Mole and surrounding areas.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding water quality and flooding at Section 4.27 of the Relevant Representations Report [REP1-048].</p>
Water Environment: Sussex North Water Zone	<p>The impacts of over-abstraction in the Sussex North Water Zone need to be carefully addressed by the Applicant. Given that water resources have no boundaries, it is essential to ensure that the project does not contribute to</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding water quality and resources at Section 4.27 of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	further depletion or degradation of water sources in this area. GAL should provide legal guarantees in perpetuity to prevent water extraction from the Hardham site or any location within the Sussex North Water Zone. The Examination Authority (ExA) must conduct a thorough examination of this aspect to safeguard irreplaceable habitats and ecosystems from potential harm arising from the project. It's crucial to prioritize the protection of water resources and the preservation of habitats for the long-term sustainability of the environment.	

109 Stephen Harrison

109.1.1. Table 109.1 sets out the Applicant's response to the matters raised in the Written Representation from Stephen Harrison [\[REP1-271\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 109.1 Response to Written Representation from Stephen Harrison

Topic	Matter Raised	Applicant's Response
Noise: Noise Insulation and home assistance scheme	<p>GAL have proposed an "improved" noise insulation scheme. Upon reading the scheme 14.9.10, it appears incomplete and inadequate. Specifically, the noise insulation schemes have:</p> <ul style="list-style-type: none"> • A fixed £20k cap that is likely to be insufficient to insulate my home against the effects (I have 12 windows, 2 French doors, 2 outside doors and a loft conversion – where the cost according to Everest of the average uPVC Window costs £600 to £1,800) particularly in the context of the cost of current building materials. It seems unreasonable to expect me to cover any additional costs while GAL makes significant profits. • No provision for inflation (surely this a mistake)? • No consideration as to the useful lifetime of the measures (it seems a one-time only offer). • No consideration for how violent vibrations caused by aircraft will be mitigated (no amount of insulation will stop my doors and windows vibrating violently when aircraft take off)! • No references for how any damage caused to interior and exterior walls that would need redecoration because of the proposed insulation measures would be rectified! 	<p>The Applicant has responded thematically to comments made within relevant representations regarding compulsory acquisition and compensation, and noise at Sections 4.7 and 4.22, respectively of the Relevant Representations Report [REP1-048].</p> <p>The applicant has prepared an update note on the ES Appendix 14.9.10: Noise Insulation Scheme [APP-180] at Deadline 2, that clarifies the ventilation that will be offered to address overheating, how the scheme will be implemented, and other details of the products to be provided, and that the sums offered will be subject to review to address inflation every three years. The sums to be offered are under review, including the Home Relocation Assistance Scheme and will be amended in an update to the Noise Insulation Scheme.</p> <p>The Applicant has responded to concerns regarding construction activities including construction dust at Section 4.3 of its Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • No consideration for how the increased noise will affect my ability to use outside spaces which will have a material detrimental impact on my mental health given the frequency with which I use and enjoy my garden, and will mean I can no longer entertain friends or family during the summer. • No consideration for how I might enjoy fresh air from opening my windows – with the only solution offered being acoustic ventilation! GAL appear to believe that I should keep my doors and windows shut for the rest of my life! <p>I find the assisted moving scheme to be insufficient and would not cover anything close to the real cost of having to move home! E.g., The average cost of an estate agent, stamp duty on a new home and moving costs will undoubtedly be far more than the £20k arbitrary figure GAL have presented!</p> <p>The impact of GAL's plans and the increased noise levels will undoubtedly directly impact the value of my property particularly in my circumstances (having named my address in their report in paragraph 14.9.103!). This is both from a pure value, but also marketability of my property. No consideration of the financial loss that I will suffer because of the project has been factored into any of GAL's documents or proposed schemes; The Human rights act and land compensation act appear to have been ignored!</p> <p>In addition, during the construction phase, will I be able to leave my washing out to dry if there is substantial dust in the environment? Who will pay for the additional costs of electricity associated with having to use a tumble drier more frequently? Will I need to clean my windows, car etc more frequently due to dust? GAL seems to have overlooked these concerns for residents in close proximity to the construction site.</p>	
Noise: Noise Modelling	<p>The noise modelling that has been prepared has a number of shortcomings. Specifically:</p> <ul style="list-style-type: none"> • It has heroic assumptions that are predicated on the future development of the Aviation industry and investment by airlines (none of which GAL can guarantee). It is not clear to what extent this is supported by the Aviation industry; Airlines have also committed to investments in larger, noisier aircraft, such as Emirates investing in 777's! • It is not clear to me how GAL have modelled the change in use of the existing runway. 	<p>The impact of noise and vibration from the Project have been fully assessed and all realistic and practicable mitigation measures have been considered. The assessment follows the relevant methodologies and guidance as described in Section 4 of ES Chapter 14 Noise and Vibration [APP-039]. The methodologies were consulted upon following publication of the Scoping Report in September 2019 and again following the PEIR in Autumn 2021, and have also been steered by the Noise Topic Working Group (comprising local authorities and the technical advisors) throughout preparation of the Environmental Statement.</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> GAL have provided no evidence to support their assumptions about the transition in aircraft, and it appears that we are just meant to believe their assumptions. The noise contours do not adequately reflect the noise levels that I experience (and have recorded myself and attached as an appendix to this response), not least because the noise monitoring stations are over 1km from my home and are all parallel to the runway. They therefore can't accurately reflect the true noise levels that I experience. Only two scenarios are presented, a central and a reasonable downside case, which assumes a slower transition to newer aircraft. A single downside scenario given the wide range of observed impacts, is completely insufficient and lacks any level of statistical credibility against which to make any assessment for a project of this size and importance. The lack of further scenarios or even stochastic modelling to look at a range of outcomes is a real flaw in the noise modelling and analysis conducted. 	<p>The forecasts of the future aircraft fleet operating at Gatwick are based on understanding of airline procurement strategies. To account for uncertainty two fleet transition rates have been considered the central case fleet and the slower transition fleet, as discussed in ES Appendix 14.9.2: Air Noise Modelling [APP-172]. This ensures the worst case has been assessed and mitigation is based upon that worst case for example through the noise insulation scheme. The way in which the two runways would be used is described in chapter five of the ES. The different aircraft using each runway are described in ES Appendix 14.9.2 Air Noise Modelling [APP-172] as this is one element of the inputs to the noise model.</p>
<p>Noise: Leq measure and the N65 Day and N60 Night noise measures</p>	<p>Whilst the Leq measure is logarithmic, it is still an average noise measure which is misleading, quite simply because it ignores the number of spikes in noise. A 3dB – 6dB increase in the average Leq measure (which is expected in my home), means that the absolute noise level when aircraft are taking off (due to their increased frequency and proximity to my house) will increase significantly given the ambient noise is far lower.</p> <p>It is the absolute frequency and severity of noise which will have the greatest impact on my health (including the number of times I am awoken) and my ability to enjoy my home, not the average measured over a prolonged period which paints a far rosier picture. I believe that the reports and modelling prepared by GAL understate the N65 Day and N60 Night numbers at my home.</p> <p>Below I have extracted the figures from the Gatwick Northern Runway Project – Aircraft Noise viewer for my postcode RH6 0DJ.</p> <p>In my experience, commercial aircraft departing from Gatwick Airport typically generate peak noise levels exceeding 65dB when flying over my home (see appendix 1 below for my own readings) in a westerly direction (which is approximately 75% of the time), with most aircraft generating a peak noise of between 76db and 86db. Once the new runway is built, all aircraft from both</p>	<p>The Leq noise metric does not ignore spikes in noise, see pages 149-150 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [AS-023], rather it weights those spikes heavily and it is for this reason that the research shows aircraft noise levels measured using this metric show the closest correlation to annoyance in the community.</p> <p>The Gatwick NRP aircraft noise viewer for this postcode shows an N65 of 390 in 2019, ie the vast majority of all flights exceed Lmax 65dB which appears consistent with the observations. In the 2032 baseline this would increase to 401 in the baseline and with project (central case fleet) that would increase to 477 in same year, i.e. an increase in this case from 401 to 477, approximately 19% which is the forecast increase in the number of flights within the 16 hour day on an average summer day. The corresponding increase in the 8 hour night is 10%. There will be significant noise impacts as reported in the ES and the mitigation measures committed to aim to minimise this as far as practicable including the Noise Insulation Scheme described above.</p>

Topic	Matter Raised	Applicant's Response
	runways flying in a westerly direction will exceed 65dB. The reports and tables presented by GAL show only a minor increase in the N65 Day and N60 Night levels, whilst the reality will be closer to 275 additional movements per day, which I don't believe is adequately captured within the figures presented by GAL in their reporting!	
Compulsory Acquisition	<p>The environmental statement on noise and vibration refers to a range of different legal precedents and statements. Importantly, I see no consideration of the Human Rights Act 1998, which sets out the fundamental rights and freedoms that everyone in the UK is entitled to, and I consider there would be a breach of my Human rights from the project going ahead. Further, the Land Compensation Act 1973 (the Act) provides a right to homeowners to claim compensation where they suffer because of works undertaken for the benefit of the community. The scheme and GAL's proposals should take note of both the land compensation act and my human rights and provide adequate compensation, which I consider to be lacking in their current proposals.</p> <p>GAL's shareholders intend to materially profit from increased flight operations, which appears to be at my expense (given the likely impact on the value of my property), and it appears that I will suffer materially from "major adverse significant" effects, which, according to global medical reports, may result in lower immune function, chronic illnesses, and potentially reduce life expectancy!</p>	<p>The Statement of Reasons [AS-008] sets out how the Applicant has considered the Human Rights Act 1998 and how the Land Compensation Act 1973 would be applied in relation to the Project.</p> <p>The term "Category 3" used within the Statement of Reasons [AS-0] pertains to individuals who The Applicant believes may be entitled to make a 'relevant claim' under Part I of the Land Compensation Act 1973 if the project proceeds. Being within Category 3 does not guarantee a successful claim, nor does being outside it prevent someone from making a claim. The Applicant has notified Category 3 individuals about their potential land interests being affected, though making a claim requires evidence and will be assessed on its merits. The methodology for determining Category 3 boundaries is outlined in the Statement of Reasons. Being notified in Category 3 serves as an alert about the Project, prompting individuals to seek advice if they believe they may be affected. However, claims cannot be made until one year and one day after the Northern Runway comes into operation.</p>

110 Stephen Haysom

110.1.1. Table 110.1 sets out the Applicant's response to the matters raised in the Written Representation from Stephen Haysom [REP1-272]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations** Report [REP1-048].

Table 110.1 Response to Written Representation from Stephen Haysom

Topic	Matter Raised	Applicant's Response
Climate Change and Policy	<p>All airport expansion conflicts with our legal and moral obligation to tackle climate change.</p> <p>'Sustainable growth' is an oxymoron; claims that building a new runway near a taxiway is 'making best use' of existing infrastructure is a lie – no more, no less.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding climate change, greenhouse gases, and the policy framework (including Jet Zero, and what is meant by 'making best use') for the Project at 4.6.1, 4.16, and 4.24.1 (respectively) of the Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	Jet Zero based on fantasy fuels, sham offsets and ludicrous levels of carbon capture is a shameful attempt to gaslight the public and greenwash the fastest growing contributor to greenhouse gases	

111 Stuart Roy Spencer

111.1.1. Table 111.1 sets out the Applicant's response to the matters raised in the Written Representation from Stuart Roy Spencer [\[REP1-272\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 111.1 Response to Written Representation from Stuart Roy Spencer

Topic	Matter Raised	Applicant's Response
Consultation	GAL has not provided for a transparent or fair understanding of the Northern Runway scheme. That is a flaw which is against GOV policy that requires such consultations be sufficiently clear to enable informed decisions on either economic matters nor noise impact matters.(ref available) Without clear detail PINS, the SoS and the public cannot reasonably make an informed decision. I raised the issue of the missing information during the 2021 public consultation, and I now see that 70% of my raised issues were not logged or responded to in the 2023/4 registered GAL documents. I therefore believe that GAL is choosing which questions to acknowledge and answer which all amounts to an unfair withholding of information which is likely to be to the benefit of GAL's case. This looks to be a deliberate action and I ask PINS to investigate and take account of this. My full evidence shows multiple cases of missing or wrong information. The subjects I raised in 2021 and which are raised again in my full submission cover the subjects of unassessed risks to demand forecast of Business and freight flights, low confidence of economic benefit forecast, sleep disturbance, failure to monetise harm of CO2, use of incorrect noise assumptions which leads to incorrect worst case noise harms, inability to assess noise impact due to obscuring presentation, prevalence of flooding risk highlighted in consultants report	<p>The Applicant has considered all responses received as part of both consultations held in 2021 and 2022, and reported upon the outcomes of those consultations in the Consultation Report [APP-218].</p> <p>Following the consultations, the Applicant has prepared its Environmental Statement in which it has assessed the impacts arising from the Project with respect to the topics listed by the Interested Party. The Applicant has considered a reasonable worst-case when undertaking the assessments.</p>
Policy	GAL is describing the demolition, relocation and complete building of a brand new runway as" making best use of existing infrastructure". This is tantamount to telling us the value of 1 is zero, or black is really white. This is pure Doublespeak. The intent of GOV policy was not to add departure or arrival capacity via newly constructed runways. If the runway were to be called	The Applicant's response to Relevant Representations that raised the same points on the description of the runway works and the relationship to planning policy is set out in Section 4.24 of the Relevant Representations Report [REP1-048] .

Topic	Matter Raised	Applicant's Response
	existing then it would not take four to five years to construct, nor would it involve around 500,000 cubic metres of groundworks to construct it. Any reasonable man or woman (or judge) can plainly understand that constructing new tarmac and concrete runway is not making use of existing infrastructure. My full evidence expands on this point of policy transgression.	

112 Surrey County Council

112.1.1. Table 112.1 sets out the Applicant's response to the matters raised in the Written Representation from Surrey County Council [\[REP1-096\]](#). Where relevant, the Applicant has provided direction to the relevant sections of the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15).

Table 112.1 Response to Written Representation from Surrey County Council

Topic	Matter Raised	Applicant's Response
Environmental /Surface Access	<p>This Council remains of the view that expansion at either airport would require the environmental and surface access issues involved to be satisfactorily addressed.</p> <p>For surface access, by adopting an approach similar to that of Luton Airport's GCG framework, whereby growth is only permitted after targets have been met, SCC could be confident that the outcomes described in the Environmental Statement and Transport Assessment would happen as described. Instead of the Applicant committing to achieve annualised mode share targets by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter, the Applicant should not start operations until the commitments are met, with subsequent passenger growth being constrained until targets are met again. This way the same outcomes are delivered, without uncertainty, and would ensure that the impacts that have been presented are the likely worst case.</p>	<p>The Applicant has been in discussion with Surrey County Council and has set out the response to previous points raised regarding adopting a green controlled growth framework at Row 2.19.1.1 of the Statement of Common Ground between Gatwick Airport Limited and Surrey County Council [REP1-045].</p> <p>The Applicant has included as part of the Application the mitigation identified as being necessary under the Environmental Statement to address the potential adverse impacts of the Project. Specific to those environmental topics and impacts which are considered most sensitive to airport growth (noise, carbon, surface access and air quality), the relevant mitigation is primarily contained within the Noise Envelope, Surface Access Commitments and Carbon Action Plan documents, each secured as requirements to, and to be certified as part of, the draft DCO (with additional air quality mitigation proposed to be included within the s106 Agreement). Each of those 'control' documents sets out bespoke independent governance, monitoring and mitigation arrangements to ensure the proper functioning and delivery of the underlying mitigation/commitments.</p> <p>The Applicant will continue to liaise with Surrey County Council and provide further updates through the Statement of Common Ground.</p>
Environmentally Managed Growth	<p>The Applicant has proposed a cap on annual commercial air transport movements (ATMs) as a mechanism to control the environmental impact of the Project and proposed a number of surface access commitments (SACs) or targets to promote sustainable travel with little in the way of sanction if they aren't met. Unlike almost all other major international airports in the UK,</p>	<p>Please see the Applicant's response to the matter above and The Applicant's Written Summary of Oral Submissions at Issue Specific Hearing 2: Control Documents / DCO [REP1-057].</p>

Topic	Matter Raised	Applicant's Response
	<p>Gatwick currently has no cap on ATMs and/or passenger numbers and therefore a total movement cap is supported in principle. However, SCC does not consider that such a cap, which is only anticipated being reached in 2047, and the SACs are robust enough in themselves to satisfactorily ensure the sustainable growth of the airport. An approach that favours environmentally lead growth would enable growth/expansion to occur within appropriate limits/once targets have been met rather than the Applicant's approach which relies on mitigation measures/measures to achieve targets after the growth/expansion has occurred.</p> <p>To monitor and control GHG emissions during the Project construction and operation, a control mechanism similar to the GCG framework would ensure the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Limits and thresholds would need to be established for GHG emissions for pertinent project stages and monitoring and reporting requirements for emissions in airport operations and surface access transportation defined through such a mechanism. Any exceedances of defined limits would have implications for capacity increases at the airport.</p>	
Noise	<p>SCC currently has major concerns over Gatwick's proposed noise envelope not being fit for purpose (LIR Chapter 12). As well as not providing any effective control or incentive to reduce noise levels at the Airport, suitable monitoring, governance and enforcement arrangements are lacking. Therefore, SCC proposes that a revised noise envelope should similarly be part of an environmentally managed growth approach along the lines of the GHG framework, including local authorities as part of the management process, with any breaches of limits having significant implications for the airport in terms of increasing capacity and slot allocation.</p>	<p>A Noise Envelope has been developed in accordance with government policy, to form a fully implementable and enforceable set of noise limits and procedures, as described in the ES Appendix 14.9.7: The Noise Envelope [APP-177]. The background to the Noise Envelope is described in ES Appendix 14.9.5 Air Noise Envelope Background [APP-175] which explains some of the options considered and the choices made.</p>
Air Quality	<p>Air quality is integral to Luton's GCG framework and was also one of the topics Heathrow included in their proposals for environmentally managed growth. SCC considers that any environmentally managed growth framework for Gatwick includes air quality based on the appropriate UK air quality limits and thresholds.</p>	<p>The Applicant's responses to Relevant Representations that raised similar points on air quality and greenhouse gases are set out in Sections 4.3 and 4.16 of the Relevant Representations Report [REP1-048].</p>

113 Surrey County Council (as landowner)

113.1.1. Table 113.1 sets out the Applicant's response to the matters raised in the Written Representation from Surrey County Council [REP1-096]. Where relevant, the Applicant has provided direction to the relevant sections of the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15).

Table 113.1 Response to Written Representation from Surrey County Council (as landowner)

Topic	Matter Raised	Applicant's Response
<p>Land interests: Bayhorne Farm</p>	<p>The dDCO identifies land within SCCaL's ownership that will be required both on a temporary and, in some cases, permanent basis to accommodate the Project. In the dDCO Work Order 35 confirms the extent of the proposed works required on SCCaL's landholding. The works are extensive and will cause significant disruption to the local area.</p> <p>Furthermore, on completion, the works will permanently alter the highway arrangements to South Terminal Roundabout ("STR") and to SCCaL's land. Application Document Reference 4.8.1 shows the Surface Access Highways Plans which show the permanent arrangements proposed on SCCaL's land and include:</p> <ul style="list-style-type: none"> • Significant realignment of the existing highway layout in this location; • An access road from Balcombe into the land to be permanently acquired; • An attenuation pond, which we understand is for highway drainage purposes. <p>SCCaL's traffic impact assessment shows that, in the absence of the Project, there is capacity on the highway network to support the development at Bayhorne Farm on a policy compliant basis for requirements associated with movement and accessibility. Therefore, in the absence of the Project, Bayhorne Farm would be brought forward to deliver employment uses and contribute to the creation of jobs for the local economy.</p> <p>However, should the DCO be granted as currently drafted this will not be possible. The Project will significantly impact on the future development of Bayhorne Farm in that it will:-</p> <ul style="list-style-type: none"> • Prevent the site coming forward as envisaged • Reduce the overall amount and quality of employment space that can be delivered on the site after the Project has been implemented • Prevent an access being taken from STR as required under Policy HOR9 • Impair the market and occupier interest in the site • Prevent the growth of local employment and the creation of high quality employment space needed in the local economy 	<p>The Applicant has been in discussion with Surrey County Council (SCC) regarding the acquisition of land and rights required at Bayhorne Farm. These discussions are documented at Row 2.7.1.21 of the Statement of Common Ground between Gatwick Airport Limited and Surrey County Council [REP1-045] and in the Land Rights Tracker [PDLA-010].</p> <p>The Applicant met with SCC and their appointed agents on the 1st February 2024 to review and discuss the concerns and potential means for mitigation. The Applicant awaits technical data from SCC to support proposed mitigation strategies - without this data, a substantial response cannot be provided or substantive progress made.</p> <p>Engagement and negotiations continue with SCC.</p>

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • create significant capacity issues on the surrounding highway network which undermines the viability of the site at a future point in time. <p>At the ISH2, Michael Bedford KC acting on behalf of the Joint Surrey Councils (including SCC) raised concerns that the proposed construction compound would impact on, and frustrate, the ability to bring forward the business park in accordance with Policy HOR9. He stated that the two uses were incompatible in achieving the aims of the local plan allocation. This is a view supported by SCCaL and mitigation measures need to be considered by GAL, and reflected in the dDCO, as to the period for which the compound is required and the measures to be taken to enable a suitable access from the STR to serve the business park to mitigate against the increased traffic generation caused by the Project.</p>	
Land interests: Gatwick Dairy Farm	<p>The dDCO would allow the permanent acquisition of c. 2.25 acres of agricultural land to facilitate Work Nos. 37 (Works associated with the Longbridge Roundabout junction) and 40 (Works associated with land to the north east of Longbridge Roundabout).</p> <p>If the DCO is granted this will result in the loss of agricultural land, which has been identified as potentially suitable to deliver Biodiversity Net Gain (“BNG”) for the Project.</p> <p>Works Order 40 includes a requirement for 2ha planting. It is assumed that this is to provide the replacement open space on SCCaL’s land at Dairy Farm (to replace the 2.25 ha being acquired) but it remains unclear as to when the works will be delivered. It is not clear how this will benefit local communities, particularly since, by article 40(1) of the dDCO, the replacement open space land will not be provided until sometime after the open space land has vested in GAL and timing of delivery needs to be confirmed.</p>	<p>The Applicant has been in discussion with Surrey County Council regarding acquisition of Gatwick Dairy Farm for the works associated with Longbridge Roundabout. These discussions are documented at Rows 2.1.3.1, 2.1.3.2, 2.1.4.1 and 2.8.4.3 of the Statement of Common Ground between Gatwick Airport Limited and Surrey County Council [REP1-045] and in the Land Rights Tracker [PDLA-010].</p>
Draft Development Consent Order	<p>In order to mitigate the risk that GAL’s use of its powers under the DCO could adversely impact SSCaL’s land interest the dDCO should be varied to confirm over which parcels of land, and when, the powers and the rights as drafted under Article 28, Article 35, Article 37 and Article 39 will be implemented, and a further explanatory memorandum provided. The time limit of 10 years for exercising compulsory purchase powers under Article 31 is excessive and this period should be shortened to 5 years.</p>	<p>The powers that are being sought over each plot of land are shown on the Land Plans [AS-015] and in the Book of Reference [REP1-009-013]. Ten years is appropriate in the context of the length of the construction period. The Applicant has further explained its position in response to ExA question DCO.1.29 (Doc Ref. 10.16).</p>

114 Suziye Mehmet

114.1.1. Table 114.1 sets out the Applicant’s response to the matters raised in the Written Representation from Suziye Mehmet [REP1-277]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant’s **Relevant Representations Report** [REP1-048].

Table 114.1 Response to Written Representation from Suzie Mehmet

Topic	Matter Raised	Applicant’s Response
<p>Planning and policy</p>	<p>The Planning Statement supporting the GAL application states (Conclusions page 4):</p> <p><i>“The application accords strongly with national planning policies by contributing to meeting the identified need for increased aviation capacity in the national interest through an innovative and carefully prepared design which generates significant local and wider benefits, whilst mitigating its relatively limited effects and embracing policies for sustainable development”.</i></p> <p><u>Rebuttal</u></p> <p>This assertion is disputed, not least because it presupposes the Secretary of State’s findings and priorities.</p> <p>Between paragraphs 1.5.1-1.5.23, the applicant’s Planning Statement sets out the legislative framework identifying the basis upon which the Secretary of State must decide the subject application.</p> <p>Specifically, the Planning Statement cites the provisions of Sections 104 and 105 of the Planning Act 2008 (to include Sections 104(2)(d) and 105(2)(c) of the Act) which mutually identify: <i>“any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision”.</i></p> <p>The Planning Statement similarly acknowledges the provisions of the National Planning Policy Framework (December 2023) (‘the Framework’) and its relevance in the determination of the application. This is important given the provisions of paragraph 157 of the Framework added in the December 2023 iteration.</p> <p>The Secretary of State will acknowledge that aviation is one of the fastest growing sources of greenhouse gas emissions.</p>	<p>Gatwick entirely accepts that issues relating to climate change are material to this application.</p> <p>It is, however, the role of government to formulate planning policies having regard to a wide range of objectives and considerations. The way in which government has balanced its priorities is apparent in its Jet Zero Strategy (“JZS”).</p> <p>JZS was published by the Department for Transport in July 2022 following a detailed technical consultation and it sets the Government’s framework and plan for achieving net zero aviation (Jet Zero) by 2050. It recognises that aviation is expected to become one of the largest emitting sectors by 2050 but is clear that aviation has a critical role to play in boosting trade, tourism and travel. The Jet Zero Strategy is clear that the Government supports growth in the aviation sector but is also committed to meeting its binding carbon reduction targets:</p> <p><i>“Meeting this challenge is vital for UK connectivity and growth. The Government recognises the aviation sector’s role in making us one of the world’s best-connected and most successful trading nations. We are committed to enabling the recovery of the sector to support our levelling up agenda through regional connectivity and to strengthen ties within the Union, as well our connectivity globally. We need solutions that reduce the sector’s emissions whilst delivering economic benefits across the UK.”</i> (Executive Summary, page 7)</p> <p>There is in place, therefore, a policy framework which directly addresses the concern expressed in the representation. It is that policy framework which should guide decision making in this case.</p>

Topic	Matter Raised	Applicant's Response
	<p>In this regard we refer to the full-length Report from the Commission to the European Parliament and the Council (23.11.2020) 'Updated analysis of the non-CO2 climate impacts of aviation and potential policy measures pursuant to EA Emissions Trading System Directive Article 30(4)', attached as three pdfs.</p> <p>The proposal in issue will facilitate a near doubling of the impacts currently experienced. Unavoidably - until science and technology advance to replace the current pollutants, this is the reality.</p> <p>For now and for purposes of the disposal of the subject application, the Climate Change Act 2008 and in pursuance of its objectives the Sixth Carbon Budget are the considerations that should reasonably guide the Secretary of State to his decision in this matter having regard to the provisions of paragraphs 2 and 157 of the National Planning Policy Framework (December 2023) ('the Framework'):</p> <p>Paragraph 2 of the Framework states:</p> <p><i>“Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.”</i></p> <p>Paragraph 157 of the Framework states:</p> <p><i>“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”</i></p> <p>Paragraph 2 of the Framework follows the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. Paragraph 157 of the Framework is consistent with the provisions of the Climate Change Act 2008 and flowing from the CCA</p>	

Topic	Matter Raised	Applicant's Response
	the Sixth Carbon Budget are material international obligations and statutory requirements to be factored in the determination of the above application.	

115 Tandridge District Council

115.1.1. Table 115.1 sets out the Applicant's response to the matters raised in the Written Representation from Tandridge District Council [\[REP1-102\]](#). Where relevant, the Applicant has provided direction to the relevant sections of the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15).

Table 115.1 Response to Written Representation from Tandridge District Council

Topic	Matter Raised	Applicant's Response
Policy	<p>Section 3 of the LIR, sets out the Policy Context at a National and Local level, page 21 refers to Tandridge's local context. Within Section 13 of the Tandridge Core Strategy entitled Environmental Quality there is specific consideration of Gatwick Airport. Paragraph 13:12 states "Gatwick Airport has a significant effect on the District because of aircraft taking off or coming into land over Tandridge. The noise from aircraft has an impact on the community of Lingfield and surrounding areas. The Council accepts that the airport can expand within the limits of the existing single runway. The Council will work with the airport operator British Airports Authority (BAA), Crawley Borough Council and neighbouring authorities to ensure the impacts of the agreed growth are minimised. The Council will oppose any expansion beyond the agreed levels if it would adversely affect Tandridge residents."</p> <p>Paragraph 13:13 goes on to state "Gatwick Airport also affects the District in that there is pressure for off-airport parking in the vicinity of the airport. The Council wishes to see any identified shortfall in provision for parking provided within the airport and not through the establishment of new car parks or extension of existing sites within the Green Belt. Restrictions on airport parking will also support the aim of increasing access to the airport by public transport."</p> <p>Policy CSP 16 relates specifically to Aviation Development: "The Council will seek to minimise the impact of Gatwick Airport by working with BAA Gatwick, Crawley Borough Council and adjoining local authorities on the development of the airport up to the projected 45 million passengers per annum within the agreed limits of a single runway/two terminal airport. New off-airport parking and extensions to existing sites will be considered in the light of Green Belt</p>	The Applicant has provided a response to the policy matters raised at Appendix A: Note on the Principle of Development (Doc Ref. 10.14).

Topic	Matter Raised	Applicant's Response
	<p>policy and the need to minimise the use of the private car to travel to the airport.</p> <p>Tandridge is also directly impacted by the on-site and off-site Gatwick Airport operations including vehicle movements, air quality impacts including emissions, noise impacts and health impacts. Tandridge District Council will therefore oppose any expansion beyond the agreed limits that would adversely affect communities in Tandridge by way of aircraft noise or reduced air quality</p>	
Air Quality	<p>The airport's operation directly contributes to air pollution levels within the district from aircraft emissions and from airport related traffic using roads within Tandridge. Furthermore, the airport related emissions outside of the Tandridge District Council boundary also contribute to background levels of air pollution within the District.</p> <p>Any expansion of the airport has the potential to adversely affect air quality within the District as a result of both road vehicle emissions during construction and road vehicle and aircraft related emissions during operation.</p> <p>The main pollutants of concern from these sources would be nitrogen dioxide and fine particulate matter (PM10 and PM2.5) and Ultrafine Particulates (known as UFPs).</p> <p>Section 11, page 184 of the LIR set out the broader case in relation to Air Quality and impact on Tandridge communities and residents.</p>	<p>The Applicant has been in discussion with Tandridge District Council and has set out the response to previous points raised with regard to Air Quality in the Statement of Common Ground between Gatwick Airport Limited and Tandridge District Council [REP1-046].</p>

116 Tay Bee Lian

116.1.1. Table 116.1 sets out the Applicant's response to the matters raised in the Written Representation from Tay Bee Lian [\[REP1-278\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 116.1 Response to Written Representation from Tay Bee Lian

Topic	Matter Raised	Applicant's Response
Land Interest	I want to sell the 2 PLOTS of UK land and do NOT give the consent for Gatwick Airport Northern Runway Project	The Applicant can confirm that the land interest owned by Tay Bee Lian is not within the red line boundary of the project, and the Applicant is not seeking Compulsory Acquisition or temporary possession powers over this land.

117 The Home Office

117.1.1. Table 117.1 sets out the Applicant's response to the matters raised in the Written Representation from the Home Office [REP1-104]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 117.1 Response to Written Representation from the Home Office

Topic	Matter Raised	Applicant's Response
Compulsory Acquisition	<p>Currently, the extent of the Home Office's interests and the impacts of the development on them are not fully understood. The Home Office is currently reviewing the Applicant's Book of Reference (BoR) and Crown Land Plans. The Applicant provided some details of the impacts on the Crown's interests in a telephone call on 19th January 2024. The buildings that are confirmed as being affected and the works to be carried out are:</p> <ul style="list-style-type: none"> • Premises at North Terminal • Premises at South Terminal • Ashdown House • Timberham House • Border force Dog Kennels <p>This information goes some way in understanding the impacts on the Crown's interests but are not detailed enough and despite this information being requested it has not been provided in full yet.</p>	The Applicant has and continues to engage with the Home Office regarding the land it seeks to acquire. The Applicant is seeking the necessary consents with the Home Office under section 135 of the Planning Act 2008.
Compulsory Acquisition	<p>The Applicant should confirm the full extent of the works on each plot that is subject to Crown Interests as set out in the BoR and the plans. This should include what land and buildings are affected and how they will be affected.</p> <p>If there are errors in the information previously provided, these need to be corrected so we have accurate information on the affected land and buildings.</p>	As above.
Compulsory Acquisition	Will buildings and rooms in operational buildings be demolished and subject to extensive works?	The Applicant has confirmed with the Home Office's agent that the information that they seek will be available at detailed design stage. As such the Applicant is seeking an Agreement with the Home Office which should provide comfort that the Home Office's obligations, statutory duties and operations will not be materially impacted, and appropriate accommodations will be put in place.
Compulsory Acquisition	What will be put in place temporarily during construction for HO operations? How long will that be for?	
Compulsory Acquisition	If rooms/buildings are going to be affected permanently by works, what is being proposed in place of existing accommodation?	
Compulsory Acquisition	If operational land/buildings are not being physically affected by works, are matters such as access (both during construction and/or permanently) to those buildings going to be affected, and for how long?	

Topic	Matter Raised	Applicant's Response
Compulsory Acquisition	What management is being put in place during construction to enable access is possible, or if not possible, where will operations be located?	
Compulsory Acquisition	Confirm the full extent of the impact of works proposed to each building.	
Compulsory Acquisition	Are there any works (within the red line) that could affect HO buildings/ land outside of the red line?	

118 Thames Water Utilities Limited

118.1.1. Table 118.1 sets out the Applicant's response to the matters raised in the Written Representation from Thames Water [REP1-103]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048] and **Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited** [REP1-038].

Table 118.1 Response to Written Representation from Thames Water

Topic	Matter Raised	Applicant's Response
General	<p>As set out in its Relevant Representation [RR-4518], TWUL does not object to the principle of the Gatwick Airport Northern Runway scheme but has concerns relating to the increase in sewage discharge as a result of the proposed development, both during the construction and operational phases. TWUL requires assurances that the Gatwick Northern Runway scheme can be delivered and managed without having a detrimental impact on TWUL's existing customers and assets. TWUL is continuing to work closely with Gatwick Airport Limited (the "Applicant") to address these concerns.</p> <p>TWUL owns land, sewers and other apparatus throughout and surrounding the DCO boundary that will be affected by the scheme, which will either need to be protected or diverted as a result. TWUL does not believe that the provisions of the draft Development Consent Order ("the Order") satisfactorily protect TWUL's existing and future apparatus and ability to comply with its statutory duties or exercise its statutory functions.</p> <p>The Applicant and TWUL have been engaging on several issues over the past few months. However, the points raised in the general objections of TWUL's Relevant Representation [RR-4518], (noted below) remain outstanding:</p>	The Applicant agrees that good progress is being made towards resolutions with TWUL.
Asset Review	This DCO affects TWUL sewerage assets. TWUL will require an asset review prior to the commencement of any works within 5 meters of existing TWUL assets. This would ultimately lead to either a letter of no further comment being issued, or the affected assets being diverted or protected under an agreement.	This matter is included at Row 2.22.5.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038]. The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course.

Topic	Matter Raised	Applicant's Response
Foul Water Discharge	Foul Water Discharge: TWUL is working with the Applicant on its modelled foul water flows to understand the impact of the change in these (as a result of the proposed development) on TWUL's network. The programme for delivering the likely strategic upgrade works as a result of the Applicant's proposal should not be underestimated and will be significant (in the order of 3-5 years from when the appropriate information is supplied). TWUL requests a requirement be included within the DCO if made specifying that no additional foul water flows from the development can be discharged until the modelled flows have been agreed by TWUL and the network upgrades implemented.	This matter is included at Row 2.22.2.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038] . The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course.
Surface Water Discharge	Surface Water Discharge: TWUL needs confirmation that any surface water discharge as a result of the development will not be contaminated and will adhere to the sequential approach of the discharge of surface water as noted in the "National Standards For Sustainable Drainage Systems" document published by DEFRA. If there is any proposed increase in surface water runoff, TWUL will need to know this in advance (with the same timescales as for the foul flows). There are particular concerns as to how glycol-contaminated surface water will be managed if it exceeds permissible discharge levels.	This matter is included at Row 2.22.3.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038] . The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course.
Trade Effluent Discharge	Trade Effluent Discharge: Prior to commencement of the development, TWUL will need to fully understand how the Applicant's on-site plant to treat contaminated surface water will function. TWUL will also need to understand what the change will be in peak volumes and concentrations of the effluent from the glycol treatment process to TWUL's network. Further clarity must also be provided on, what happens to the discharge	This matter is included at Row 2.22.4.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038] . The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course.
Drainage Strategies	Drainage Strategies: Notwithstanding what is expected from paragraphs 2.2-2.5, TWUL requires an integrated water and drainage strategy (including details of points of connection to the existing sewer network) detailing how the Applicant intends to deal with all water and wastewater generated on the site. TWUL requests a requirement be included within the DCO if made that these strategies are provided to and agreed by TWUL prior to the modelling noted above.	This matter is included at Row 2.22.3.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038] . The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course.
Specific concerns with the dDCO wording:	Regarding the dDCO [PDLA-004], since submitting TWUL's Relevant Representation [RR-4518], Gatwick and Thames Water have been in contact and are on the second iteration of responses. A few points (Articles 22(1), 22(2), 22(11), 41 and 43) have been closed however, several points remain outstanding. TWUL has particular concerns with the following provisions:	This matter is included at Row 2.7.1 of the Statement of Common Ground between Gatwick Airport Limited and Thames Water Utilities Limited [REP1-038] . The Applicant will continue to engage with TWUL on this matter and provide further updates to the SoCG in due course. As regards TWUL's particular concerns noted here, GAL considers that these can be adequately addressed through protective provisions in the DCO. To the extent that TWUL requires amendments to the current protective provisions in Part 1 of

Topic	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • Article 6(4) – Limits of Deviation: Altering ground levels by more than 300mm could cause significant issues for TWUL infrastructure and TWUL require further assurance on this article. • Articles 27, 28, 36 – Compulsory Purchase Order: TWUL is seeking an obligation in the Protective Provisions that the Applicant's powers of compulsory acquisition are not exercised over land in which TWUL has an interest without its agreement. • Schedule 9 Paragraph 7(2) – Removal of Apparatus: 28 days notice is set out in the DCO but this insufficient to determine the impact on TWUL's infrastructure so an increase to 56 days notice is requested. • Schedule 9 Paragraph 7(3) – Removal of Apparatus: As drafted, the requirement for TWUL to use best endeavours to obtain facilities and rights and land for alternative apparatus to be constructed outside the order limits could mean that TWUL is required to use its compulsory purchase powers to obtain these. TWUL is seeking the inclusion of drafting to make clear that the use of TWUL's compulsory purchase powers is discretionary. • Schedule 9 Paragraph 7(6) – Removal of Apparatus: TWUL needs to retain absolute control over who works on its assets. The current wording does not facilitate this. • Schedule 9 Paragraph 7(7) & 7(8) - Removal of Apparatus: Deemed consent to the removal of assets has the potential to prevent TWUL from discharging its statutory obligations such as conveying sewerage or potable water. TWUL is not content with the current wording. • Schedule 9 Paragraph 10 & 11 – Expenses and Costs: TWUL and the Applicant are currently in discussions to agree suitable expense and indemnity wording as the current wording does not offer sufficient protection to TWUL 	<p>Schedule 9 of the Draft Development Consent Order [REP1-004], GAL is willing to consider bespoke protective provisions for the benefit of TWUL.</p>

119 Thomas George Gillhespy

119.1.1. Table 119.1 sets out the Applicant's response to the matters raised in the Written Representation from Thomas George Gillhespy [\[REP1-279\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 119.1 Response to Written Representation from Thomas George Gillhespy

Topic	Matter Raised	Applicant's Response
Noise	The South East is densely populated and there are few areas to explore nature without noise pollution or development. The areas around Gatwick are popular with campers, walkers and cyclists who want to enjoy the peace of nature but additional flight paths and additional surface traffic will limit even further the places local residents can visit without too much disturbance.	The Applicant has provided a response to concerns regarding noise in its thematic responses at Section 4.22 of the Relevant Representations Report [REP1-048] under <i>Concern about the impact of noise on habitats or wildlife, or on the tranquility of areas such as AONB or heritage assets.</i>
Greenhouse Gases	It is incompatible with our climate targets due to the extra flights and construction and traffic to and from the airport.	The Applicant has provided a response to concerns regarding Greenhouse Gases in its thematic responses at Section 4.16 of the Relevant Representations Report [REP1-048] .
Surface Transport	The extra traffic and rail passengers will cause already busy trains to be more cramped and for roads to be more congested.	The Applicant has provided a response to concerns regarding extra traffic and rail transport in its thematic responses at Section 4.26 of the Relevant Representations Report [REP1-048] .
Socio-Economics	Future-proof green jobs are the best employment to offer local people, not jobs that lock us into an unsustainable future and hence insecure line of employment.	The Applicant has provided a response to concerns regarding employment and local jobs in its thematic responses at Section 4.25 of the Relevant Representations Report [REP1-048] .

120 Transport for London

120.1.1. Table 120.1 sets out the Applicant's response to the matters raised in the Written Representation from Transport for London [\[REP1-105\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 120.1 Response to Written Representation from Transport for London

Topic	Matter Raised	Applicant's Response
Greenhouse Gases	<p>The proposed development entails an increase in air traffic movements (ATMs) of 36% compared to 2018, with carbon emissions reaching 17% above 2018 levels. A further 1 MtCO₂e is forecast to be emitted in 2038 compared to the future baseline of the same year, with the project contributing 21% increased emissions above the baseline.</p> <p>Given Gatwick is forecast to be responsible for 4.545 MtCO₂e even without the proposed development, we question the acceptability of Gatwick seeking to increase these emissions by a further 23% (over the future do minimum scenario). This is likewise a higher proportion of emissions than 2018 and as such relies on others to cut their emissions in order for Gatwick to increase its share of carbon. This development also needs to be considered in the context</p>	<p>The summary data presented by TfL are noted and reflect the appraisal of emissions from aviation set out in ES Appendix 16.9.4: Assessment of Aviation Greenhouse Gas Emissions [APP-194]</p> <p>The Applicant considers that government policy should be recognised in full, including the commitments made by Government in the JZS and in the follow-on publication Jet Zero – One Year On. Those publications demonstrate that the Government is completely committed to achieve net zero and to a rigorous monitoring process to ensure that policies and measures can respond to uncertainties and developments to ensure that the trajectory to Jet Zero is met. As the Government explains in the Jet Zero Strategy:</p> <p><i>“If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to</i></p>

Topic	Matter Raised	Applicant's Response
	<p>of growth at other London and UK airports, placing further strain on the carbon budget.</p> <p>The Applicant is also placing a heavy reliance on sustainable aviation fuel (SAF) to reduce emissions for both the baseline and expansion scenarios. In the Environmental Statement, the calculations for greenhouse gas emissions from flights are based upon the Jet Zero 'high ambition SAF' scenario. However, should the high ambition SAF scenario not be met, emissions from aircraft will be significantly higher, putting the forecast 27% reduction out of reach. The Applicant must begin work on a credible SAF strategy which can drive the transition for airlines, taking into account the increased costs of SAF compared to conventional fuel. Given the reliance worldwide on SAF and the limited feedstocks, with no plants currently operational in the UK, for these emissions figures to be achievable Gatwick must consider a strategy in detail at the earliest opportunity. Without this, even the insufficient 27% reduction in emissions is unlikely to be realised.</p> <p>More broadly, the Applicant should set out concrete plans for reducing the emissions of aircraft, including detailed measures to increase use of SAF and encourage newer, lower emission aircraft. Plans should also include achieving level 4+ of the Airport Carbon Accreditation (ACA) scheme.</p> <p>Carbon emissions from surface access likewise remain important, given the increase in passengers travelling to and from the airport. All levers available to the Applicant should be exercised to increase the proportion of those travelling to their airport by sustainable modes.</p>	<p><i>ensure that the sector maximises in-sector reductions to meet the UKs overall 2050 net zero target.” (page 10).</i></p> <p>However, the analytical approach underlying the Jet Zero Strategy is clear that it does not seek to apportion future aviation emissions to any specific airport or geography. The Strategy instead, rightly, takes a national view on the management of emissions from aviation and (as set out above) will monitor and adopt measures to ensure the trajectory is achieved while allowing the relative split of emissions between different airports to be driven by demand and competition between those airports. As GHG emissions are considered to have impact that is not related to their source location then the relative portion of emissions arising from different locations does not have a material effect on their resultant impact.</p> <p>With regards to SAF, and indeed to other assumptions within the modelling of aviation emissions, again the Jet Zero Strategy is clear that the rate of progress within each of these is uncertain, and the relative proportion each of these will contribute to achieving the Jet Zero cannot be known at this point. This is precisely the reasoning behind establishing a process of periodic review of progress, to allow UK Government to consider what further measures may be needed.</p> <p>In terms of SAF, the Applicant has shown that SAF can be used at LGW now: the infrastructure and associated administrative processes are in place and have been proven to work. Further, at London Gatwick already today the Applicant is pursuing the following SAF-related activities to support the development of a suitable SAF industry:</p> <ul style="list-style-type: none"> • Continuing to support the UK Sustainable Aviation Coalition's work on developing a SAF industry, working with the Jet Zero Council Sustainable Aviation Fuel Delivery Group, as well as advocating for more Government support. • Exploring measures to support increased SAF supply, including understanding production in South / South East England. • Developing a programme of engagement to increase passenger awareness and understand willingness to pay for SAF. • Investigating the blending point at which infrastructure changes may be required. • Exploring partnerships to help accelerate the development of the SAF industry.

Topic	Matter Raised	Applicant's Response
		<ul style="list-style-type: none"> Investigating an evolution of the carbon charge in the Conditions of Use tariff to include a SAF incentive. <p>In order to accelerate the development of a suitable hydrogen industry, the Applicant is pursuing the following initiatives:</p> <ul style="list-style-type: none"> Partnership with Metrobus to support a new fleet of hydrogen buses operating around the Airport. Participation in an industry alliance with multiple industry partners. It is expected that workstreams will include exploring the hydrogen ecosystem in the UK, including the hydrogen supply chain at LGW, ground operations and aspects of advocacy. <p>The Applicant achieved Leve4+ of the ACA scheme in 2023.</p> <p>The Applicant has provided further information in respect of the development of the hydrogen industry in response to ExA question CC.1.9, Applicant's Response to ExQ1 (Doc Ref. 10.16).</p> <p>GAL's commitments in relation to mode share targets and interventions to achieve those targets, together with review, monitoring and governance processes are set out in ES Appendix 5.4.1: Surface Access Commitments [APP-090].</p>
Surface Transport	<p>There needs to be much greater ambition from the Applicant when it comes to securing sustainable mode shift. If the environmental impacts are to be addressed, the Applicant must go beyond the proposed target of 55% sustainable mode share for passengers and staff compared to the currently observed 45% for passengers and 31% for staff – with the latter also including car sharing. Gatwick is able to count on exceptional rail access, with fast and frequent connections to London and a wide range of destinations through its recently upgraded station, and this should be reflected in its level of ambition.</p> <p>Nonetheless, it is important that the Applicant does not seek to rely wholly on schemes already delivered to support background growth and demand from the airport broadly in line with today. The proposed development is forecast to result in an additional 20,000 rail journeys by 2032, yet current capacity forecasts – which only assume modest growth in airport demand – envisage that capacity on the Brighton Main Line will be exhausted in the 2030s. As well as creating challenges for the operational railway, worsening levels of crowding risk discouraging sustainable mode shift. We also note that the Applicant has,</p>	<p>In response to the issues raised:</p> <p>Sustainable mode shares - The mode share commitments within ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] represent the position the Applicant is committing to achieve, based on the modelling of mode choice and transport network operation. The Applicant has set these mode share commitments and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport [AS-076] and in the Transport Assessment [AS-079] are delivered. The SAC also includes a section on the further aspirations, which includes more ambitious mode share targets which the Applicant will be working towards.</p> <p>No car growth - The issue of seeking to achieve no car growth as a result of the Project was raised at Issue Specific Hearing 4. The Applicant's response, submitted at Deadline 1, can be found in paragraph 6.1.5 of Written Summary of</p>

Topic	Matter Raised	Applicant's Response
	<p>in a number of instances, used 2016 as its baseline for its surface access analysis. This risks overstating the mode shift that might be secured in conjunction with the proposed development by including the benefits of major rail enhancements which were delivered in the period 2016-2019, notably the Thameslink upgrade. Indeed, it is deeply disappointing that the passenger and staff highway mode share is forecast by the Applicant to remain almost unchanged between 2029 and 2047.</p> <p>But it is a particular concern that the 55% target for passengers travelling by sustainable modes still allows for a very substantial increase in highway trips. Compared to 79,000 passenger highway trips per "busy summer day" in the 2016 baseline data provided by the Applicant, an increase of over a third in highway trips with the proposed development is forecast by 2047 – to 107,000 highway trips on an equivalent day. If the Applicant is seeking to expand then it should be committing to no increase in highway trips. Based on these numbers, that would entail a sustainable mode share target of at least 65%.</p> <p>Similarly, it is incompatible with sustainable development for the Applicant to be seeking an additional 7,700 parking spaces compared to today, 10% of total current on- and off-site parking. This runs completely counter to the sustainability of the proposed development and the need to minimise its associated emissions.</p> <p>Aspirations for mode shift need to be matched by sufficient commitment on the levers to be used to increase the proportion of sustainable trips to the airport and prevent an increase in car journeys. This includes clarity on the use of demand-side measures, including car parking and forecourt drop-off charges, to change travel behaviour. At the same time, it is essential that there is a committed plan for measures to encourage sustainable trips. It is disappointing that the extent of interventions on the highway network is not matched by similarly comprehensive efforts to support rail and other sustainable modes.</p> <p>Core to rectifying this would be extending the scope and quantum of the Applicant's existing sustainable transport fund, to allow it to support interventions beyond the immediate locality of the airport. In particular, it could help unlock rail schemes which are currently yet to be fully defined and which could include: the Croydon Area Remodelling Scheme (CARS) – providing much needed rail capacity on the Brighton Main Line; a direct service from Gatwick to Kent via Redhill; a third train per hour on the North Downs line</p>	<p>Oral Submissions from Issue Specific Hearing 4: Surface Transport [REP1-059].</p> <p>Car parking - The Applicant has responded thematically to comments made within relevant representations regarding car parking numbers at 4.26.1 of the Relevant Representations Report [REP1-048]. The Applicant is seeking a net increase of 1,100 parking spaces as part of the Project, over and above car parking that would be available in the future baseline without the Project, see Table 5.3.2 of ES Chapter 5: Project Description [REP1-016]. This is the equivalent of a 2% increase on the future baseline.</p> <p>Rail capacity - The Applicant has responded thematically to comments made within relevant representations regarding rail demand at 4.26.1 of the Relevant Representations Report [REP1-048]. Based on the modelling work, no significant impact is expected on rail crowding and no additional funding or mitigation is required in either the form of additional rail services or the provision of additional or enhanced physical rail infrastructure. The Applicant is engaging with Network Rail and GTR on this matter.</p> <p>2016 baseline - Note that further modelling has been undertaken to account for post-Covid conditions in transport modelling at the request of the Examining Authority as part of Notification of Procedural Decision [PD-006]. This is contained in Accounting for Covid in Transport Modelling [AS-121] and [AS-122]. It includes a re-verification of the model based on 2023 observed data.</p> <p>Sustainable Transport Fund - the Applicant will continue to set aside the Sustainable Transport Fund which is derived from levies on the number of car parking spaces available and from a proportion of forecourt access charges. This will continue to be available for initiatives to support sustainable transport modes.</p> <p>EV strategy - The Applicant will keep the provision of EV charging infrastructure in Airport car parks under review as part of the future ASAS which will be developed for the Project, based on the commitments in ES Appendix 5.4.1: Surface Access Commitments [APP-090], including engagement with infrastructure providers and local authorities to ensure continued compliance with relevant Government policy</p> <p>Gatwick Airport Transport Forum - The Surface Access Commitments [APP-090] sets out the monitoring and reporting progress and will continue to engage with the Transport Forum Steering Group (TFSG).</p>

Topic	Matter Raised	Applicant's Response
	<p>towards Guildford; and earlier morning trains on additional corridors to match early shifts and flights. Indeed, a portion of the fund should be ringfenced to give priority to rail interventions to ensure they are afforded sufficient emphasis. The expanded fund could also be used to kickstart new coach services to locations away from the Brighton Main Line, including those in Southeast and Southwest London, which the Applicant has been investigating. Such interventions would be alongside measures to improve local bus services, cycling and walking access to the airport.</p> <p>Funding specifically set aside to improve the customer experience for public transport users should also be considered, addressing, for example, pinch points in the airport station and signage at key interchanges. More thought needs to be given to the smaller measures which could address such issues and help improve the public transport experience – so further encouraging mode shift. There would be merit in a revamped Gatwick Airport Transport Forum – with stakeholder buy-in at a sufficiently strategic level – as the group to drive the sustainable mode shift agenda and agree disbursement of the transport funds.</p> <p>More granular mode shift targets, for example by geographical area or by mode, would be an option for enhancing the transparency of the mode share objectives. If there remains uncertainty as to how quickly the Applicant can achieve stretching sustainable mode share targets, a further approach would be to set formal limits on growth in airport passenger throughput if certain mode share thresholds are not met. It should be noted that such limits and thresholds need to be sufficiently meaningful and stringent if such a mechanism is to have credibility.</p> <p>We also note the emphasis on electric vehicles (EVs) to drive down the emissions from surface access. Notwithstanding the issues surrounding EV particulate emissions from brake and tyre wear, if this growth in EVs is expected, the Applicant should also set out its strategy for EV charging and ensuring adequate charging infrastructure, including implications for the grid – recognising these have long lead times to address.</p> <p>Concerns remain about the modelling of capacity on rail services. There needs to be a fuller understanding of the impact on the Brighton Main Line corridor of baseline growth, including Gatwick demand, in addition to the proposed development – and the ability of this to be accommodated. This includes at</p>	<p>Detailed modelling area - In the context of London, GAL has, following extensive discussion with TfL, used outputs from their transport models to reflect the London transport network. This has included extracts from their London wide Highway Assignment Model, LoHAM for the simulated south London area, and also for the area inside the M25. The Applicant has exchanged information with TfL on the likely highway demands in London and it was concluded that the scale of impacts were not sufficiently material to be modelled in the full TfL modelling suite.</p> <p>M23 Smart Motorways - The Smart Motorways announcement cancelling the M25 J10 - 16 scheme occurred after the completion of modelling undertaken for the Application. This scheme update, along with updates to the timing of other schemes such as Lower Thames Crossing, were considered in the sensitivity testing presented in Accounting for Covid-19 in Transport Modelling [AS-121].</p>

Topic	Matter Raised	Applicant's Response
	<p>times of perturbation in airport or railway operations – on a line which Network Rail has flagged struggles with the demands put upon it. There are questions about some of the uncommitted services the Applicant has assumed in its modelling, whether it has taken adequate account of luggage and of the notable seasonality of Gatwick's demand and how that will evolve as the airport grows and what appears to be an absence of freight services in its assumptions on track capacity. There are also questions as to increased traffic flows via the newly opened Elizabeth line and the cumulative impacts associated with the Luton Airport Expansion DCO which also relies on Thameslink. Taken together, the Applicant has not adequately demonstrated that there will be no significant increase in rail crowding as a result of the proposed development.</p> <p>This is further complicated by the aggregation of passenger demand across each hour in the modelling which does not take sufficient account of the mix of fast and slow services operating on the Brighton Main Line, including the Gatwick Express. The reality is that uneven loadings across services creates substantial crowding, at the airport and further along the line. Aside from the additional doubts that this casts on the conclusion of the modelling, this does suggest that, at the very least, service pattern options which might allow a better distribution of demand between services should be considered.</p> <p>We also remain concerned that the highway model only includes a small proportion of South London in the 'detailed modelling area.' The rest of London is modelled as part of the 'Fully Modelled Area', but with fixed speeds, as taken from the South East Regional Transport Model (SERTM). Given the significant number of projected highway trips between Gatwick and London – including the areas not covered by the 'Detailed Modelled Area' – it is likely that the full impacts across wider areas of London have not been assessed. The demand calculation of highway trips to and from London for both baseline and project scenarios would be needed to be provide suitable assurance. We also note that further sensitivity testing could be required, to assess further impacts across London and provide confidence that the proposed mitigations will withstand demand.</p> <p>Moreover, additional work is needed to understand the impacts of the expansion on the wider strategic road network, in the context of the cancellation of the proposed M25 smart motorway between J10 and J16, which had been included in the modelling. In the event of increased congestion, work</p>	

Topic	Matter Raised	Applicant's Response
	needs to be undertaken to understand the impact traffic seeking alternative routes could have within London. There is a risk of increased congestion, which also impacts bus and coach services and exacerbates air pollution.	
Air Quality	<p>Air pollution and its impact on human health remains a key concern for Londoners. The Applicant must demonstrate how it is addressing air quality, including emissions from aircraft take offs and landings as well as from airside operations and increased highway traffic. Ensuring passenger and staff trips are by sustainable modes is an critical element of this.</p> <p>The Applicant's assessment is mostly focused on the locality of the airport and has not sought to understand the potential air pollution impacts within Greater London. London remains a key origin/destination for Gatwick Airport passengers and the large volumes of traffic moving to and from the airport could lead to reduced levels of air quality, particularly closer to key traffic corridors, such as the A23. Our concern is that increased traffic levels to and from the airport could increase the health impacts of air pollution for local communities, The Mayor has taken the difficult decisions required to substantially reduce air pollution in London; the proposed development appears to seek to bank those improvements and so undermine the steps London has taken to improve air quality.</p>	<p>The Applicant has responded to concerns that air quality will worsen as a result of NRP and concerns regarding human health at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>ES Air Quality Figures – Part 2 [REP1-018] Figure 4.1.1 demonstrates the modelled road network which extends into Greater London on roads that are predicted to exceed the screening criteria due to the Project. Sensitive receptors within 200 m of the road network have been assessed to capture the impact of road traffic changes at representative worst-case (most sensitive) locations. Detail on the study area is provided in Section 13.5 of ES Chapter 13: Air Quality [APP-038].</p> <p>ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Air Quality, including paragraph 18.8.10 noting the study area alignment with ES Chapter 13: Air Quality [APP-038] zones of influence.</p> <p>ES Chapter 18: Health and Wellbeing [APP-043] concludes, paragraph 18.8.45 <i>“The professional judgement is that the significance of the population health effect would be up to minor adverse (not significant). Regard has been given to the baseline context, the WHO 2021 advisory guidelines (WHO, 2021), the updated PM_{2.5} standards (UK Government, 2023) and to non-threshold effects. The health assessment conclusion reflects there is a very small scale of change in air pollutants due to the Project.”</i></p> <p>The UK Health Security Agency (UKHSA) and the Department of Health and Social Care Office for Health Improvement and Disparities (OHID) are the national statutory stakeholders for public health, and were previously collectively Public Health England. UKHSA and OHID in their combined relevant representation [RR-4687] of October 2023 confirm that: <i>“Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health”</i>. These Government organisations have a particular role and technical expertise in relation to the public health effects of changes in air quality.</p>
Noise	We would expect the Applicant to fully assess and address the noise impacts of the proposed development, notwithstanding that the impacts are generally	The ES provides a full assessment of noise effects. The Applicant has responded to comments on increased noise impacts due to increased flights and sleep

Topic	Matter Raised	Applicant's Response
	<p>outside London. There will be increased noise exposure for local communities as a result of the increase in the number of flights. It is positive that the Applicant has highlighted properties exceeding noise limit values from both construction and the additional flights, but it should also be cognisant of the more stringent World Health Organization (WHO) Europe guidelines, which reflect the latest scientific evidence on the serious health impacts. For aircraft noise, it recommends 45 dB Lden for average noise exposure and 40 dB Lnight for average night noise exposure as the limits above which there are adverse health effects.</p> <p>The greatest noise impacts appear to relate to the night-time period. Given the particularly negative health impacts associated with sleep disturbance from aircraft noise, the Applicant needs, in particular, to set out its commitment to limit night-time movements. As noted in the Environmental Statement chapter 14, there is a significant population – around 19,000 people – for whom night time noise will exceed the WHO recommended levels.</p> <p>Assessment of a suite of noise metrics to better understand the impacts is critical and we welcome the Applicant's efforts in this regard. Nevertheless, the average noise metric used by the Applicant is not suitable given that this risks underplaying the impact of peak noise events.</p> <p>Air noise insulation is a part of the mitigation strategy; the Applicant should consider whether the proposed thresholds are sufficient to include all those experiencing substantial noise exposure – and ensure that they are able to support those residents who are unable to fund their share of insulation when only eligible for a contribution from the Applicant.</p>	<p>disturbance at night in the thematic responses provided in Section 4.22 Relevant Representations Report [REP1-048]. The ES Chapter 14: Noise and Vibration [APP-039] discusses the WHO guidelines.</p> <p>In the year 2000 Department for the Environment, Food and Rural Affairs commissioned a National Noise Incidence Study, that concluded:</p> <p><i>The National Noise Incidence Study has found that 54±3% of the population of the UK live in dwellings exposed to day-time noise levels above the WHO level of 55 dB LAeq,day. Similarly, it has found that 67±3% of the population live in dwellings exposed to nighttime noise levels above the WHO level of 45 dB LAeq,night.</i></p> <p>Further analysis of the data shows that the population living above the current WHO guideline level for night, Leq 8 hr 40 dB was 95%. The WHO guidelines for the onset of health effects should be taken in the context that the majority of the UK population is exposed to noise above these levels. The predominant source of noise is road traffic.</p> <p>The physiological sleep disturbance study reported in ES Appendix 14.9.2: Air Noise Modelling [APP-172] provides an analysis of sleep disturbance based on Lmax (peak) noise levels using the methodology derived from the WHO systematic review, and concludes that the project would not result in more than one awakening per night in any location. This is because the additional number of flights at night is small, 10% on an average summer night.</p> <p>The noise insulation scheme has been proposed with two main zones; the Inner Zone to provide noise insulation so as to avoid significant adverse effects on health and quality of life, and an Outer Zone to provide noise mitigation for adverse effects. The sums available are much higher for the inner zone and in the outer zone reduce as noise level reduces offering lower contributions to the cost of noise insulation. These sums are being reviewed with regards to inflation and will be updated in the noise insulation scheme in due course. ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Noise Exposure. Specific regard is given to vulnerable groups, which are listed at paragraph 18.8.107. Table 18.7.1: includes specific mitigation measures to support uptake of the Noise Insulation Scheme for local vulnerable groups. These are set out in ES Appendix 14.9.10: Noise Insulation Scheme [APP-180] paragraph 4.1.15. In addition, ES Chapter 18: Health and Wellbeing [APP-043] paragraph 18.11.22 confirms that the new</p>

Topic	Matter Raised	Applicant's Response
		Community Fund can be used by GAL to provide discretionary support to individuals in local communities, particularly those falling into more than one vulnerable group, who experience particular hardship as a result of in-combination effects of the Project. The expectation is that such cases would be rare, but should they arise, a process is in place to mitigate against severe and inequitable health outcomes.

121 Tunbridge Wells Borough Council

121.1.1. Table 121.1 sets out the Applicant's response to the matters raised in the Written Representation from Tunbridge Wells Borough Council [REP1-105]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 121.1 Response to Written Representation from Tunbridge Wells Borough Council

Topic	Matter Raised	Applicant's Response
Needs Case	<p>Tunbridge Wells Borough Council notes the questions raised in KCC's Written Representation about the Needs Case made for the proposal, in particular:</p> <p><i>GAL's approach to calculating demand forecasts is aspirational and the 'bottom up' approach used by the Applicant does not provide sufficient evidence to support the claimed increase in throughput, its composition in terms of routes and the future airline fleet of aircraft, or test the implications of more capacity at other airports. A consequence of the approach to demand forecasts is that the wider economic benefits of the proposed development as set out in the Oxera report appended to the Needs Case (APP-251) have been overstated due to the failure to adequately distinguish the demand that could be met at Gatwick from the demand which could only be met at Heathrow and the economic value that is specific to operations at Heathrow. There are also concerns that the methodology by which the wider catalytic impacts in the local area has been assessed (Appendix 17.9.2 to the ES [APP-200]) is not robust and little reliance can be placed on this assessment.</i></p> <p>Therefore, the Council does not have confidence that the decision maker can rely on the assessment of impacts to judge if the benefits of the proposal outweigh the harms.</p>	<p>GAL set out its approach to forecasting in its Needs Case Technical Appendix 2 [APP-251 – APP-252] submitted at Deadline 1.</p> <p>There is a difference of approach between GAL's forecasting team and York Aviation, advising the joint local authorities. GAL addresses this difference further in The Applicant's Response to Local Impact Reports (Doc Ref. 10.15) submitted at Deadline 3.</p> <p>GAL strongly prefers its forecasts and, in so far as these matters have been adjudicated on elsewhere, that judgement fell in favour of a bottom-up approach to forecasting (which is also an approach with York Aviation used in part itself at the recent Luton examination).</p> <p>In circumstances where there is an acknowledged and documented overhang of outstanding demand from airlines to come to Gatwick – and where Gatwick's commercial team works very closely with incumbent and candidate airlines, it is not unreasonable to expect that GAL has a detailed understanding of how airlines (and which airlines) would respond to capacity release at Gatwick.</p> <p>A more remote and theoretical top-down approach may be appropriate in other circumstances but the forecasts show Gatwick 'filling up' rapidly once the NRP is in place, which adds a further premium to the value of an approach based on up to date knowledge of airline intentions.</p>

Topic	Matter Raised	Applicant's Response
		<p>However, GAL has provided an alternative top-down forecast in its Needs Case Technical Appendix [APP-251 – APP-252] and it is unsurprising that the conclusions are very similar. With a strong unmet demand which is greater than the capacity of the NRP and no prospect of any other major airport offering significant new capacity in the short to medium term, the outcome of GAL's forecasting is entirely credible.</p>
<p>General: Intensification of the Main Runway</p>	<p>Routinely using the Northern Runway would create extra capacity on the existing main runway and therefore allow the opportunity to increase the number of larger aircraft arriving and departing from the main runway. TWBC is concerned that the opportunity for increased use of the main runway is not fully assessed by the Applicant and therefore the full impact on the local communities that will be over-flown in the future is not known and it is not possible to plan for appropriate mitigation.</p>	<p>The increased capacity created on the main runway and the aircraft that would subsequently use it has been fully allowed for in the air traffic movement forecasts provided for the noise assessment.</p>
<p>Noise</p>	<p>The Council's principal concern regarding the proposed Northern Runway Project is the potential noise impact of increased Gatwick flights on communities and businesses in the borough.</p> <p>We refer to Kent County Council's LIR that identifies a number of adverse impacts in regard to air noise and requests further information from the Applicant, as follows: <i>Noise Impact A of KCC's Local Impact Report refers to the Applicant's assessment of overflight.</i></p> <p><i>It is not currently possible to determine the true extent of the anticipated impact of overflight as the number of overflight events are not provided, apart from landscape assessment locations chosen by the Applicant. However, it is clear from the figures provided that areas within West Kent would experience a worsening of overflight. Further detail is needed for local authorities to understand the true extent of overflight impacts on communities on the ground. In addition, the Applicant's application provides no clarity on how the Northern Runway Project will impact arriving aircraft at Gatwick. Further clarification is required from the Applicant as to the breakdown of proposed arrivals and departures with the Northern Runway in routine use, and whether any increase in arrivals has been assessed. Without this assessment, the true extent of the impacts felt by communities on the ground will not be properly assessed.</i></p> <p><i>KCC appreciates it is difficult to predict the need for aircraft to go-around when arriving into Gatwick. However, it should be noted that any increase in the number of air traffic movements at the airport will inevitably result in an</i></p>	<p>Please refer to the Applicant's response to the Kent County Council Local Impact Report, Section 5.3 Noise within The Applicant's Response to Local Impact Reports (Doc Ref. 10.15). This addresses their comments on overflight and go-arounds.</p> <p>Paragraph 14.9.139 of the ES is only partly quoted here. The full paragraph reads as follows:</p> <p><i>The increase in size of the annual Lnight contours in 2032 due to the Project compared to the 2032 base is 11-12%, which is slightly larger than the increase in the summer Leq 8 hr noise contours of 9%. The increase in area of the annual day evening night Lden noise levels due to the Project in 2032 compared to the 2032 base is 17% which is the same as the increase in the summer daytime Leq 16 hr 51 dB contours in 2032. Overall, this suggests that any seasonality in the way the extra capacity delivered by the Project is used has little effect on noise levels across seasons.</i></p> <p>2032 is the year of peak noise impact. We would expect the difference between the change in annual contours compared with the change in summer season contours, resulting from the project to be similar in other assessment years.</p> <p>The noise insulation scheme is based on the slower transition fleet i.e. the worst case expected in terms of fleet transition and hence ensures adequate mitigation will be provided for those affected in the worst case.</p>

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	<p><i>increased chance of go-arounds. As it is not possible to estimate the number of additional go-arounds the Northern Runway Project may generate, it is not possible to understand the increased impact this will have on communities on the ground. KCC would encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.</i></p> <p><i>The Applicant has used annual noise contours to determine if extra capacity would affect noise levels during periods outside of the 92-day summer period. It is hard to draw any meaningful conclusion from the analysis of annual contours. Paragraph 14.9.139 [APP-039] identifies that, in 2032, increases in Lden contours are the same as the increase in LAeq,16h noise contours; however, Lnight contours increase by 11-12%, which is larger than the increase in LAeq,8h contours. This suggests that there is a larger increase in annual night-time movements than in the 92-day summer period. Clarification should be provided on seasonality during the annual night-time period and whether a larger increase in contour size warrants any identification of significant effects. Furthermore, it would be helpful to understand if there are any seasonal variations in movements during other assessment years.</i></p> <p><i>Gatwick Airport Limited's proposals assume a growing fleet of quieter aircraft will be achieved over the timescales of the Project. However, in order for impacted communities on the ground to be appropriately mitigated it is imperative the proposed Noise Insulation Scheme is generous, robust and fit for purpose.</i></p> <p><i>Currently the Applicant's Noise Insulation Scheme [APP-180] document provides a small-scale map of the proposed boundaries. Given Kent's distance from the airport, it is likely any eligible households will be located within the Outer Zone but it is difficult to determine from the size of the map exactly where the boundary will fall. In addition, information should be provided around which schools would be included within the Schools Insulation Scheme, along with details of other noise sensitive receptors.</i></p> <p><i>Furthermore, clarity is needed as to how the Noise Insulation Scheme will be reviewed and revised following implementation of the Future Airspace Strategy Implementation South (FASI-S) Airspace Change Process which will result in a redesign of the Gatwick flight paths.</i></p>	<p>Paragraph 14.9.80 of ES Chapter 14: Noise and Vibration [APP-039] gives the link to the online Northern Runway Project Air Noise Viewer to assist stakeholders who wish to study the various air noise contours used in this ES and the extent of the Noise Insulation Scheme, and it includes a postcode lookup tool to enable a home owner to find their location easily to check eligibility.</p>
Noise: Impact on Tunbridge Wells	The Council is aware that residents and businesses in the west of the borough are already impacted adversely by current flights into Gatwick, and this is a	Please refer to the Applicant's response to the Kent County Council Local Impact Report, Section 5.3 Noise within The Applicant's Response to Local Impact

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	<p>matter of significant concern. It is of greater concern that the Council is not able to currently determine the impact of the proposals on Tunbridge Wells district due to the Applicant's application failing to provide any information about aircraft noise within the borough. It is noted that, for this reason, the LIR prepared by KCC is inconclusive on its assessment of noise impact on the borough of Tunbridge Wells. Therefore, alongside KCC, the Council requests for the Applicant to undertake further assessment to illustrate the impact of noise in Tunbridge Wells borough: Figure 14.9.31 of APP-065 demonstrates how Tunbridge Wells will experience a significant level of overflight in 2032, however no further information is provided to enable KCC to meaningfully assess the level of impact. Furthermore, during westerly operations Tunbridge Wells is more so affected by arrivals and no information has been provided in GAL's application as the associated noise impacts with the Northern Runway in routine operation.</p> <p>TWBC also agrees with KCC's concerns regarding the proposed Noise Envelope: Noise Impact G of KCC's Local Impact Report highlighted that the noise envelope put forward by the Applicant does not fulfil the purpose for which it is intended and nor does it fulfil the majority of characteristics stated in CAP 1129.</p> <p>KCC requests that the Applicant undertakes further work on the noise envelope, in consultation with local authorities, to develop a robust noise envelope.</p> <p>TWBC is particularly concerned about the impact of the NRP on the High Weald National Landscape (formerly Area of Outstanding Natural Beauty) which comprises more than 70% of the borough. TWBC agrees with KCC's representation which states that: <i>Where possible the NRP should seek to further the purposes of the National Landscapes within the wider area, including those which aircraft overfly. Whilst it may be more appropriate for the airspace change process to address these matters, consideration needs to be given to the impact this project will have on the tranquillity of National Landscapes.</i></p>	<p>Reports (Doc Ref. 10.15). This addresses their comments on overflight, noise impacts and the proposed Noise Envelope. ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] assesses impacts on the High Weald National Landscape having regard to a number of matters, including CAA guidance (CAP1616 Appendix B, para B30 and B56). The frequency of aircraft movements and general orientation of flights are illustrated in Figures 8.6.3 to 8.6.7 of the ES Landscape, Townscape and Visual Resources Figures [REP2-007] together with nationally designated landscapes and 10 popular and well known locations within them.</p> <p>The assessment of effects on the perception of tranquillity within the High Weald National Landscape as a result of an increase in the number of overflying aircraft up to 7,000 ft above local ground level compared to the future baseline situation in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers) provides as follows: <i>'People generally experience a relatively high level of tranquillity in nationally designated landscapes of high scenic quality. These receptors are likely to be of high or very high sensitivity to change. Overflying aircraft at less than 7,000 feet above local ground level currently form a regular visible or audible feature that forms a slightly discordant aspect when experiencing the landscape. The special qualities that people living within and visiting the High Weald AONB experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of an increase in the number of overflying aircraft, would still be positive qualities that would be perceived'</i>.</p> <p>The maximum increase in daily overflights of 15 to 20% is defined in Table 2.2.7 of ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] as 'increase in number of daily overflights discernible to people'. It is considered that the increase in overflights may be imperceptible to some receptors. The magnitude of change is generally considered to be negligible and the level of effect up to minor adverse.</p> <p>No new flight paths are proposed, therefore there is no potential for any area of landscape, either designated or undesignated, that is currently not overflown by aircraft to be overflown as a result of the Project.</p>
Climate Change	Tunbridge Wells Borough Council is committed to playing its part in meeting the UK's Net Zero Target and meeting the legally binding ambitions of the Paris	It is noted that various stakeholders have their own commitments and reductions trajectories. However, the test applied to assess significance of the impacts arising are carried out in line with IEMA guidance by comparison to national carbon

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	<p>Agreement. The Council recognised the Climate and Biodiversity Emergency in a full council motion in 2019.</p> <p>Aviation is recognised as both one of the most carbon-intensive forms of transport and one of the most difficult to decarbonise. As well as its' CO2 impact, aviation also has a significant non-CO2 climate impact, the extent of this impact is as yet not fully understood and further research in this area is ongoing. (Climate Change Committee - Progress in reducing emissions 2021 Report to Parliament). This means that aviation could well be the largest contributor to UK greenhouse gas emissions by 2050, particularly as demand is expected to grow. (Aviation, Decarbonisation, and Climate Change, House of Commons Library Research Briefing – September 2021).</p> <p>The Climate Change Committee (CCC) advice in the Sixth Carbon Budget and confirmed in their 2023 progress report also states; that there should be no net expansion of UK airport capacity, unless the sector carbon intensity is on track to sufficiently outperform the government's aviation emissions trajectory and thus can accommodate the additional demand. Currently, UK policy is not consistent with this outcome. Therefore, based on the lack of clarity and ability to meet the required emissions trajectory pathway as set out by the CCC, the proposed expansion at Gatwick by bringing the Northern Runway into permanent use has not been justified by the Applicant.</p> <p>It is important that the proposal does not jeopardise the UK's ability to meet the Paris Agreement's goal of holding the increase in the global average temperature to well below 2°C above preindustrial levels and pursuing efforts to limit the temperature increase to 1.5°C temperature limit.</p> <p>The Council notes the Applicant's focus on how the NRP aligns with the Government's Jet Zero Strategy but wishes to see further clarity on how the proposal complies with the Climate Change Committee's recommendations. In particular, the Council wishes to know if the impact of the Northern Runway Proposal on the Sixth Carbon Budget has been calculated. TWBC supports the Written Representation made by KCC as follows: KCC believes the Northern Runway project would have a significant material impact on the Government's ability to meet carbon reduction targets and therefore should weigh against granting development consent. By 2050, routinely operating the Northern Runway would see Gatwick being responsible for 20% of the overall UK aviation carbon budget. KCC is concerned that this expansion cannot be</p>	<p>budgets, and contextualised against appropriate sectoral trajectories to achieve Net Zero at a national scale.</p> <p>This is noted in Paragraph 16.10.4 of ES Chapter 16: Greenhouse Gases [APP-041] that references the IEMA Guidance noting that <i>"The inappropriateness of undertaking a cumulative appraisal (other than by contextualising against Carbon Budgets) is reflected in the IEMA guidance. This guidance notes that 'effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other'."</i></p> <p>The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government's target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government's most recent response responded to the Progress Report 2022.</p> <p>The Government responded directly to the 2022 recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> • <i>"197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway.</i> • <i>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure."</i>

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	<p>justified in the wider context of the global requirement to reduce CO2 emissions.</p> <p>The proposals will further contribute to carbon emissions and does not align with the Council's own carbon reduction ambitions to reach Net Zero by 2030.</p>	<p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • <i>“We will monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022. • The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits.</i> • <i>If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target.”</i>
Surface Transport	<p>The Council notes the ambitious target for a public transport mode share of 55% to and from the airport, including a significant increase in air passenger coach services proposed for Kent. However, we also note that KCC has requested an additional modelling sensitivity test to ascertain what the implications of a lower public transport mode share of 45% (2019 levels) would be for the county as a whole.</p> <p>Rail links to Gatwick from West Kent are currently inadequate and a direct link from Tonbridge – Gatwick is a long-held aspiration of TWBC (as well as West Kent partners Tonbridge & Malling and Sevenoaks and KCC). This priority is set out in the Council's Economic Development Strategy and is also a priority in Kent County Council's 2021 Kent Rail Strategy. The service could then link on through Kent to Ashford and Canterbury, bringing a significant benefit to the county as a whole.</p> <p>TWBC has attended recent meetings with Network Rail regarding work to explore the potential for improved services between Tonbridge and Gatwick via Redhill, but we understand that there are currently no plans to take this work forward. Therefore, TWBC would encourage GAL to lobby Network Rail and the Department of Transport on this matter.</p> <p>TWBC notes the proposed new Royal Tunbridge Wells-East Grinstead-Gatwick coach service and supports improved coach links to the Airport. However, it is assumed that this would be routed via the A264; a narrow, rural, single-</p>	<p>The Applicant is committed to the mode shares set out in the Appendix 5.4.1: Surface Access Commitments [APP-090] which is a legally binding document and is secured through Requirement 20 of Schedule 2 to the Draft DCO (Doc Ref. 2.1).</p> <p>The Applicant will continue to engage with Network Rail and Train Operators in respect of measures to achieve its sustainable more share commitments, including consideration of additional services to improve rail accessibility where these services are compatible with network resilience and reliability.</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090] indicates the suggested destinations for the proposed bus and coach service enhancements and the details of routes for these services are subject to further discussions with operators.</p>

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	<p>carriageway road which KCC (as the local highway authority) deems unsuitable for such a service as it could have negative impacts for other drivers and local residents on this route.</p> <p>KCC has stated that the route between Royal Tunbridge Wells and Gatwick is likely to be faster via the A21, M25 and M23 – a route which could also link Tonbridge, a catchment of comparable population to Royal Tunbridge Wells, while East Grinstead is already served by the Uckfield-East Grinstead-Gatwick coach service and local buses.</p>	
<p>Socio: Economics: Economic Development</p>	<p>The visitor economy is a vital part of the overall local economy in Tunbridge Wells as set out in the Council's 2023 Economic Development Strategy. The 2021 Economic Impact of Tourism Report (derived from the Cambridge Model) calculated that the value of the visitor economy in the borough was £191m, supporting 4,505 local jobs. There were 3.6m visitors to the borough in 2021, which was a 44.4% increase on 2020.</p> <p>TWBC therefore recognises the importance of transport links to the UK for international tourism as well as surface transport links from the airport. However, the success of the borough's visitor economy relies on the beauty of the natural environment, particularly the High Weald National Landscape. The Applicant's proposal is likely to have a negative impact on the visitor economy businesses in the west of the borough and those in neighbouring districts such as Penshurst Place and Hever Castle that are also important attractions for visitors that come to Tunbridge Wells.</p> <p>TWBC recognises that there may be some potential economic benefits (employment and skills development), that growth at Gatwick could bring to the south east as a whole. We would anticipate that these are likely to be more relevant to the local authority areas nearest to the airport, particularly since (as set out above) public transport links from Tunbridge Wells are poor at present.</p> <p>The Council notes that the Applicant's Employment, Skills and Business Strategy (ESBS) seeks to maximise the opportunities to improve skills and employment prospects across a wide area. However, TWBC agrees with KCC that the Implementation Plan would be better secured through the DCO as opposed to a separate S106 Agreement. This is because the ambitions of the ESBS stretch further than the geographical area of which a S106 Agreement</p>	<p>Workers will be in jobs spread across a wide area – the six Local Authorities (Croydon, East and West Sussex, Surrey, Kent and Brighton). An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200].</p> <p>The Applicant has responded thematically to comments made within the relevant representations regarding benefits outweighing costs and overstatement of benefits at Section 4.25 of the Relevant Representations Report [REP1-048].</p> <p>The Employment Skills and Business Strategy [APP-198] includes provision to support the visitor economy across the wider region.</p> <p>The Section 106 Agreement binds the freehold land owned by the Applicant within the Order Limits. This means that any future owner of the land will also have to comply with the s106 Agreement. It does not mean that the obligations must all relate to the bound land. There is no geographical limit on where the obligations within s106 Agreement may apply. The Community Fund is another example of obligations that will have an impact beyond the land bound by the s106 Agreement.</p> <p>In response to the request by ESCC and KCC, the Applicant is content to include those bodies on the ESBS Steering Group which will approve the ESBS Implementation Plan. This will be included in the next version of the draft DCO s106 Agreement which will be submitted at Deadline 5.</p>

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	<p>would cover and not all authorities will be party to the S106 Agreement. Therefore, TWBC asks that commitments to deliver on such a strategy should be secured through the DCO either in the form of a Requirement, or a control document such as a Stakeholder Actions and Commitments Register.</p> <p>Overall, TWBC remains concerned that the negative impacts of the NRP will outweigh any benefits to the local economy as well as questioning if the potential benefits are overstated.</p>	

122 Vanessa Henderson

122.1.1. Table 122.1 sets out the Applicant's response to the matters raised in the Written Representation from Vanessa Henderson [REP1-280]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 122.1 Response to Written Representation from Vanessa Henderson

Topic	Matter Raised	Applicant's Response
Noise	<p>Live in Dorking and are subject to flights coming from Gatwick that are already changing their flight paths from the agreed Route 4 to fly further north. At the same time we also experience stacking issues for Heathrow airport, and helicopter flights directly over our house from Redhill aerodrome. There is no night time curfew on flights at Gatwick Airport, and I have frequently been woken up by night time flying at 12.30 or later and 5.30 in the morning, in the summer when there are many more flights at these times, having the windows open means frequently being disturbed from sleep. The noise will obviously increase if this expansion is allowed to happen as aircraft movements are due to increase by 35%, also the noise envelope of the airport will increase.</p>	<p>The Applicant has responded to comments on increased noise impacts due to increased flights and sleep disturbance at night in the thematic responses provided in Section 4.22 Relevant Representations Report [REP1-048].</p>
Surface Transport	<p>There are no public transport infrastructure plans to cope with an intended 70% increase in passenger numbers to 46.5 million passengers per year. There are plans by Gatwick to increase the car parking within their own boundary by 55%. Therefore rural roads through Surrey will be utilised by increased car traffic to Gatwick Airport if this expansion goes ahead. Gatwick is not going to be contributing to the upkeep of Surrey roads, local government and tax payers will effectively be subsidising a private foreign company!</p>	<p>The Applicant is committed to funding bus and coach services, as set out in Commitments 5 and 6 of the Surface Access Commitments (SAC) [APP-090], as well as active travel infrastructure as part of the surface access improvement works (see Section 2.2 of the Transport Assessment [AS-079]). Paragraph 5 of Schedule 3 to the draft Section 106 Agreement [REP2-004] secures a minimum £10 million investment from GAL to support the introduction or operation or use of bus and coach services.</p>

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		<p>The Applicant has responded thematically to comments made within relevant representations regarding car parking numbers at 4.26.1 of the Relevant Representations Report [REP1-048].</p> <p>The Project will result in a net increase of 1,100 car parking spaces, which is an increase of 2% compared to the future baseline.</p> <p>Strategic modelling has been undertaken for the region, as shown in Diagram 5.3.3 of the Transport Assessment [AS-079] which includes a large proportion of Surrey and its road network, both rural and urban. The Airport is well located relative to the strategic highway network and the majority of Airport-related traffic is forecast to use the M23. Based on the modelling work, no significant increases in traffic are expected through rural roads in Surrey. The assessment shows that the Project (including the proposed highway works) is not expected to result in significant environmental effects or operational impacts related to the performance of the highway network which would require mitigation.</p>
Greenhouse Gases	<p>If this expansion of Gatwick Airport goes ahead it will be generating 5.5% of all UK CO2 emissions by 2038. This airport is not the main freight hub. This huge emissions burden is predominantly for short haul European holiday flights. How is the UK going to meet its plans for net zero by 2050 by increasing emissions. Are the public being asked to cut down on their carbon footprint by changing to green vehicles, air source heat pumps, etc., when airlines are burning huge quantities of fossil fuels which they pay no tax on. Gatwick Airport claims that they will be net zero, they are referring to the airport building and environs, not the huge increase in fossil fuels that will accompany this expansion.</p>	<p>The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 the ES Chapter 16: Greenhouse Gases [APP-041]. Specifically, this includes the updated guidance from IEMA on Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022). In line with this guidance the assessment considers the proposed development, and the greenhouse gas emissions arising from this, against the UK's legal commitments to achieve Net Zero by 2050, and against interim carbon budgets.</p>
Air Quality	<p>There will be a huge increase in road traffic on all roads throughout Surrey with the proposed expansion of Gatwick Airport. This increase in traffic will obviously lead to increased pollution in a predominantly rural area. There will be increased pollution coming from aircraft emissions. Aviation is the main human source of ozone, which is a respiratory health hazard. Ozone at ground level is one of the major constituents of photochemical smog, it is formed through the reaction of gases in the presence of sunlight.</p> <p>Aircraft and ground support equipment release particles into the air. In a 2014 study at Los Angeles airport it was found that 'Emissions from an International Airport Increase Particle Number Concentrations 4 fold at 10 km downwind' ref: Environmental Science and Technology pubs.acs.org</p>	<p>The Applicant has responded to concerns that air quality will worsen as a result of NRP, increasing pollution from airport and road traffic sources at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>The Applicant provides justification for the pollutants assessed in the methodology in ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. Ozone (O₃) is not a primary airport pollutant, although airports contribute precursors (volatile organic compounds (VOCs) and nitrogen dioxide (NO₂)) to the formation of O₃ on a regional and trans-national scale. Therefore, O₃ is not currently included in the regulations for local air quality management (The Air Quality Standards Regulations, 2016) and is not considered in this assessment.</p> <p>The emissions of particulates related to aircraft and ground support equipment have been calculated using in line with best practice guidance and available data</p>

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		<p>using the methodology set out in ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]. A summary of impacts from the emissions calculated has been provided in Section 13.10 of ES Chapter 13: Air Quality [APP-038]. The assessment concludes that the impact of the Proposed Development would be not significant.</p>
Water Environment	<p>The expansion of aircraft at Gatwick Airport will lead to the need for greater airport hardstanding. This will mean more run off of polluted water into the sewage system. The increased passenger numbers will mean a vast increase in water demand and sewage. This area in the South East is usually one of the UK's driest areas with high summer temperatures, and the summer usage of water outstripping water capacity. The demand is usually kept up by winter rain fall. Will this huge new demand for water and sewage processing be able to be accommodated?</p> <p>Thames Water was fined £3.34 million after admitting it pumped millions of litres of raw sewage into the Gatwick Stream and River Mole near Gatwick in 2017 killing thousands of fish. Is this company competent to deal with the increasing demand of an expanded Gatwick Airport?</p> <p>There are many chemicals used in de icing, and particulates from tyres of aircraft and servicing vehicles which will go into the sewage system. In a 2010 study made well before the recent climate change extreme rain events, the Gatwick Sub-region Joint Water Cycle Scoping Study Crawley.gov.uk states 'The predominantly urban nature of Crawley, Horley and Gatwick Airport accentuates run-off in the Upper Mole Catchment Area, resulting in a 'flashy' catchment that responds quickly to rainfall events'. Obviously this is pointing to the potential for pollution events in times of high rain fall which due to climate change we are now experiencing.</p>	<p>Surface Water Drainage</p> <p>ES Appendix 11.9.6: Flood Risk Assessment [AS-078] demonstrates that the existing discharge rates from the airport and surface access highways improvements drainage systems would not increase. The Project incorporates SuDS and attenuation measures to restrict runoff rates and provide storage of additional runoff.</p> <p>The Project complies with the Environment Agency's guidance on the consideration of the predicted impacts of climate change, see Section 3.7 of ES Appendix 11.9.6: Flood Risk Assessment [AS-078]. The mitigation measures will ensure no increase in flood risk to other parties for the lifetime of the development, including an allowance for the predicted impacts of climate change. see Table 11.8.1 of ES Chapter 11: Water Environment [APP-036].</p> <p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p>

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		<p>Water Neutrality and Supply</p> <p>While the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water (SESW) who source their water from the River Medway catchment. SESW have confirmed via an email of 9 February 2024 that they can meet the additional demand as a result of the Project.</p> <p>Separately to the Project, the Applicant is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change. As a conservative approach this reduction has not been taken into account in the ES assessment for the Project.</p> <p>The Airport is located on a thick layer of clay which acts as an aquiclude. It would therefore be expensive and technically challenging for the Applicant to develop a new local source of water that would be within the Sussex North Water Supply Zone. Therefore, the Applicant does not envisage a scenario when it would develop a new local source of water.</p>
Socio Economics: Employment	Gatwick Airport have claimed the benefits of expansion of the airport will lead to a huge increase in employment within the local area. The continuation of automation of much of the airport will not lead to huge increases in employment. There will be an obvious need for construction workers during the building phase, but given the high cost of housing I presume they will need to travel from other areas to fill this temporary demand.	The Applicant has responded thematically to comments made within the relevant representations regarding automation and affordable housing at Section 4.25 of the Relevant Representations Report [REP1-048] . The Applicant has also considered the impact of the temporary construction workforce on housing demand within ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201] .
General: Property values	I chose over 20 years ago to move to this area after suffering from road noise blight. My interest in this area was because it was green, beautiful and quiet, with AONB's nearby. I deliberately choose to live somewhere where I wouldn't experience noise from low overhead planes. As a community in Dorking we had to push for a return to the Route 4 in 2014, after Gatwick Airport started to send planes in a more northerly flight path with the introduction of NPR. They claimed that planes were suddenly incapable of making the turns which they had done for many years! The return of air travel after the pandemic has lead to an increased level of flights into areas that previously were quiet. Including beautiful country areas which attract many visitors wishing to escape from London for the day and walk and exercise in the Green Belt. The Green Belt was created to stop urban expansion. Yet This planned expansion of Gatwick	The Applicant has justified its position regarding an assessment of property price impacts within Table 17.4.2 of ES Chapter 17: Socio-Economic [APP-042] .

Topic	Matter Raised	Applicant's Response
	<p>Airport will ruin the Surrey Hills and the peace and quiet that people expected to be able to enjoy here whether living, working or visiting.</p> <p>This expansion will lead to a reduction in property values, but no compensation. Why should a large proportion of people in the South of England put up with noise, pollution, over crowded roads and huge rise in CO2 emissions for a private equity company to earn huge amounts of money effectively subsidised by the tax payers of Surrey?</p>	

123 Victoria Chester

123.1.1. Table 123.1 sets out the Applicant's response to the matters raised in the Written Representation from Victoria Chester [\[REP1-281\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 123.1 Response to Written Representation from Victoria Chester

Topic	Matter Raised	Applicant's Response
Socio Economics: Economic Benefits	<p>Overstated Benefits:</p> <p>A variety of claims about the number of jobs that will materialise as a result of the expanded airport and the construction works have been bandied about (in part by those with a direct interest in the application being approved). As a result there is a widely held idea that jobs for Horley will number in the thousands.</p> <p>We need a detailed (and honest, based on reliable modelling) breakdown of jobs by type and location i.e. how many are direct on-airport, how many are predicted for Horley, what sort of jobs these will be, what salaries etc. in an accessible format that people can easily understand.</p> <p>Salary and security is really important as house prices (rental and purchase) are high here and many of the 'new' jobs will not pay well enough to enable employees to afford to live locally. How can GAL ensure wages are high enough for employees to be able to afford to live locally?</p> <p>Procurement of contractors for construction works- how many will be local- what guarantee is there for this? I know from experience that teams are nearly always brought in from elsewhere. How will GAL ensure construction jobs are</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding overstatement of economic benefits, job security and jobs created, and affordable housing at Section 4.25 of the Relevant Representations Report [REP1-048].</p> <p>The circa 14,000 workers will be spread over a wide area. An estimate of where workers will live is set out in Table A4.2 of ES Appendix 17.9.2 Local Economic Impact Assessment [APP-200].</p> <p>The Project will generate a range of employment opportunities from entry level jobs (e.g. cargo handling) to highly skilled engineering and advanced service sector jobs (e.g. air traffic control). An estimate of types of direct on-airport employment is provided in Table A1.1 of ES Appendix 4.3.1: Forecast Data Book [APP-075].</p> <p>The vast majority of the construction workers will be based locally, i.e. Crawley and Reigate and Banstead. An estimate of where the construction workforce will be based is provided in Annex 1 of ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].</p> <p>Demand for temporary accommodation during the construction phase from non-home based (NHB) workers is unlikely to give rise to significant housing effects as</p>

Topic	Matter Raised	Applicant's Response
	<p>kept for local people? Also need to bear in mind many of these roles will be on a temporary basis.</p> <p>Teams brought in for the construction period will need to live somewhere, and those on the lower waged new roles will need affordable housing- how are we going to accommodate this? We already have a shortage of affordable housing, and Horley is bursting at the seams with current and proposed new builds as it is (without the accompanying necessary infrastructure)- we don't really have room for more houses, especially as most of the remaining available land is green belt and on flood plain. (areas of land directly adjacent to the build site in Horley, and a little further along in Charlwood have been earmarked for housing schemes which themselves will massively negatively impact the local area without the added impact of the expansion)</p> <p>The 'needs case' for jobs in the area is questionable; unemployment rates in Reigate and Banstead are low, and the airport can't fill the vacancies it already has. People don't want these insecure, low paid roles. The airport was a big employer historically in Horley, to some degree it still is, but since the pandemic many people haven't flocked back to the airline industry. It treated them very badly and they want more security. There are far better areas on which to focus in terms of providing long-term, highly skilled (and paid) roles in the broader 'green' industry. This work is crucial to the UK achieving its Net Zero goals (as opposed to airport growth which is actively working against it).</p> <p>There are no proposed targets or monitoring in relation to economic benefits, nor any way of ensuring that these will be delivered locally, and those most impacted will be the most benefited/compensated.</p> <p>More broadly, the case for airport jobs (both need and provision) hangs around the projected baselines and 'needs case' in terms of numbers of passengers/flights anticipated. These numbers are unreliable. There have been many concerns raised about the modelling which I won't go into here; suffice to say that a 'local benefit' case based on dubious (and likely significantly inflated) figures is not a strong case.</p> <p>It was interesting at the Open Hearing how many businesses, from as far afield as London and Brighton, spoke about the benefits they believed they would receive from expansion, whilst obviously not worrying about any of the</p>	<p>the number of NHB works (even at its peak) represents a very small proportion of the supply of different accommodation tenures available to meet this demand. The Project is unlikely to have any impact on affordable housing demand beyond what is already being planned for in the authorities in Gatwick's surrounding areas. These points are discussed in Sections 6 and 7 of ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201].</p> <p>The assessment of national impacts follows DfT's TAG (at the time of submission) and assesses costs and benefits from the scheme where possible given the available data and information at the time of submission. While this type of assessment is not required for private-sector schemes, the application uses TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p> <p>The Applicant will enhance local benefits through the ESBS.</p>

Topic	Matter Raised	Applicant's Response
	<p>consequences. I would like to hope more weight is given to the comments and concerns of those directly impacted by the proposal.</p>	
Construction	<p>Understated Detriments:</p> <p>Noise-</p> <p>A concrete crusher is planned to be located off the northern perimeter road- again, very close to Horley residents. There is no detail about this plant in the application even though the noise from its operation could hugely impact people residing nearby. Has an assessment been done to model noise levels and range? Have the hours of operation been defined?</p> <p>There is also scant detail in Code of Construction Practice about the two construction sites (size, layout, materials and machinery, perimeter treatments etc.). All these elements could impact on levels of noise (and other nuisance) suffered by local residents.</p> <p>High levels of road/vehicle noise from increased traffic, especially from large construction vehicles, which will pass nearby to and through certain residential areas. How will residents be protected from these adverse impacts?</p> <p>General construction noise, occurring on a daily basis and sometimes through the night, will massively impact residents living in the Riverside and Gardens Estate areas. This will potentially go on for decades. Noise insulation schemes will not be suitable for / available to everyone, or be sufficient, and will not help during summer months when residents want to open their windows (this also generates a risk of overheating).</p>	<p>The Code of Construction Practice [REP1-021] is secured by Requirement 7 of the draft DCO. This includes the measures that are required to mitigate the impacts arising from the construction of the Project.</p> <p>The ES Appendix 5.3.1 Buildability Report – Part A [REP2-013]– Section 5.5 sets out the expected methodology of the demolition activities (including the concrete crusher) in the NRP DCO, including the proposed location of the concrete crusher.</p> <p>Section 7 of the ES Appendix 5.3.1 Buildability Report – Part A [REP2-013] details the key temporary construction compounds required for the NRP DCO. This section provides information on the anticipated compounds and their requirements, proposed locations, indicative timelines, sizes and the principle components of each compound.</p> <p>The concrete crusher in the Car Park Y compound would operate during daytime working hours only. The final choice of plant will be made by the Contractor and will be submitted to the local planning authority along with details of best practical means to reduce noise as part of the Section 61 Application before the work begins for their approval. The concrete crusher is not expected to give rise to noise impacts at residential properties that are over 120m away.</p> <p>ES Chapter 14: Noise and Vibration [APP-039] provides a full assessment of the likely impacts of noise during construction of the project in. ES Appendix 14.9.1 Construction Noise Modelling [APP-171] provides further details including lists of construction equipment assumed for the noise modelling work.</p> <p>The Applicant has responded to comments relating to construction noise and its management in the thematic responses titled ‘<i>Concern over noise impacts during construction</i>’ provided in Section 4.22 Relevant Representations Report [REP1-048].</p>
Construction	<p>Relocation of residents:</p> <p>How many residents, living closest to the construction site, will be relocated and when will this process commence? we need much more detail on how this is going to be done, where residents will be moved to; for how long etc.? How will the impacts on travelling to work/school etc. from a different possibly more remote location, and being uprooted from their community, be mitigated? How</p>	<p>The CoCP gives the commitment to temporarily rehouse residents if necessary if the stated noise levels are exceeded. However, in assessing the likely worst case the ES concludes there should be no need for temporary housing. Under the requirements of the CoCP the contractor will apply to the local authority through a Section 61 application stating all the noise control measures proposed to be agreed with the local authority before work commences.</p>

Topic	Matter Raised	Applicant's Response
	<p>is the decision to relocate being made- what parameters/thresholds are being used? Who is covering the various associated costs?</p> <p>How is this being communicated to residents? What other options are being offered to residents? Beyond health & safety considerations can residents opt to stay and be compensated by other means? I must reiterate- residents have not been made sufficiently aware that they may be forcibly relocated and subject to a highly stressful experience.</p>	
Construction	<p>Construction Traffic:</p> <p>(1) How will GAL ensure the requirement for construction traffic to use the M23 is enforced? (2) For example, there is currently no access to the south terminal / M23 spur from the Balcombe Road construction compound- via which route is this traffic going to go? (3) How are GAL going to stop large lorries going down small residential roads to avoid traffic? The use/creation of access roads through residential areas in xx xx will put massive pressure on the infrastructure, cause noise and congestion problems, and pose a danger to people living there.</p> <p>The new road infrastructure is scheduled to complete after the airport construction works- so we will at this point already have the increased traffic but we will not have the increased capacity. Is GAL waiting until the end to do this work because it does not have confidence in its predicted figures?</p> <p>There is little information about works to the bridge over the Balcombe Road which look to be substantial. The Balcombe Road is a busy road and a main route in and out of Horley- how long will works take and what mitigations are proposed against the huge, and potentially lengthy, disruption that will be caused? What are the planned diversion routes? What impacts will these have on residents and infrastructure?</p>	<p>Section 6.5 of ES Appendix 5.3.2: Code of Construction Practice Annex 3 - Outline Construction Traffic Management Plan [APP-085] sets out the restrictions on construction vehicles movements and the robust system that will be included within the CTMP. The results of the monitoring process will be shared with relevant stakeholders, including the relevant planning authority. Section 5.6, South Terminal Roundabout Contractors Compound, details the access arrangements to the compound which includes the main HGV access point from the south terminal roundabout and a secondary access for private vehicles at Balcombe Road. Section 6.4, Local Roads, records that this secondary access onto Balcombe Road will be used for the adjacent replacement of structures.</p> <p>ES Chapter 5: Project Description [PDLA-006] Table 5.3.1: Indicative Sequencing of Construction Works. Records that it is anticipated that the Surface Access Works will be completed three years after the commencement of dual runway operations.</p> <p>ES Appendix 5.3.1: Buildability Report - Part B - Part 2 [APP-081]; Appendix H – includes information in respect of the proposed works to Balcombe Road Underbridge. This Appendix includes over 25 slides of the anticipated construction sequencing.</p>
Construction	<p>Air Pollution and wider health impacts:</p> <p>Dust impacts- there is no mitigation plan for construction dust- this is essential to prevent harm from air pollution related disease to residents. The presence of high levels of dust will also cause a cleanliness nuisance in the area and adversely impact the natural environment (in fact there is no air quality action plan for the project at all).</p>	<p>The Applicant has responded to concerns that air quality will worsen as a result of NRP construction works at Section 4.3 of its Relevant Representations Report [REP1-048].</p> <p>In order to manage future emissions, measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement.</p> <p>The Applicant has responded to concerns about Riverside Garden Park and Church Meadows as a result of NRP construction works at Section 4.2 and Section</p>

Topic	Matter Raised	Applicant's Response
	<p>Air pollution will be greatly increased with the onslaught of construction vehicles through the town, with the potential addition of pollution from the various industrial processes taking place on site.</p> <p>More people passing through always means more litter (and potentially more fly-tipping of construction waste, another big problem here), which is detrimental to public health, as well as the environment.</p> <p>Riverside Garden Park and Church Meadows, the only publicly accessible open spaces in South Horley, will be heavily impacted by construction works and not be (fully) accessible to the public for much of this time, depriving local residents of the only places where they can exercise and enjoy nature. Seeing their beloved parks destroyed, and not being able to utilise these crucial amenities, will be very detrimental to the mental and physical well being of local people.</p>	<p>4.17 of its Relevant Representations Report [REP1-048] ES Chapter 18: Health and Wellbeing [APP-043] paragraph 18.8.357, concludes that there is the potential for a minor adverse (not significant) population health effect.</p> <p>Management of construction waste is set out in the Construction Resource and Waste Management Plan [APP-087] (ES Appendix 5.3.2: CoCP Annex 5).</p>
Surface Transport	<p>Local transport links rail, road (bus and car) will not be able to support the proposed growth in passenger and staff numbers from this expansion. Local feeder roads will not benefit from any improvement or capacity building but will be heavily impacted.</p> <p>GAL claims it wants to encourage sustainable transport but there are no plans to expand rail capacity or fund improvements to infrastructure (which will be impacted by increased usage). The heavily used commuter trains from Horley to London, for example, will almost certainly be pushed beyond capacity.</p> <p>Similarly, there is no proposed investment in new/improved bus services.</p> <p>GAL's predicted future passenger numbers for Gatwick is comparable with that at Heathrow at Heathrow (a 5-terminal airport) but comparable infrastructure improvements are not proposed.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic and rail demand, and funding for buses and coach at 4.26.1 of the Relevant Representations Report [REP1-048].</p> <p>The Applicant is committed to funding bus and coach services, as set out in Commitments 5 and 6 of ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090], Paragraph 5 of Schedule 3 to the draft Section 106 Agreement [REP2-004] secures a minimum £10 million investment from GAL to support the introduction or operation or use of bus and coach services. The Applicant is also providing new and improved active travel infrastructure as part of the Project highway improvements, see Section 2.2 of the Transport Assessment [AS-079].</p>
Surface Transport	<p>Horley often has major congestion issues along its main roads, such as the A23 Brighton road and the B2036 Balcombe Road, which will be heavily impacted by the construction works. As well as causing stress and delays, this will increase noise and air pollution in residential areas.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding construction impact on the highway network at 4.8.1 of the Relevant Representations Report [REP1-048].</p> <p>The proposed use of the land within the Order limits and the justification for the compulsory acquisition powers sought in its respect is set out within the Statement of Reasons [AS-008]. With regard to access to/from the existing garages and</p>

Topic	Matter Raised	Applicant's Response
	<p>The modelling/design for traffic flow shows a bias, in as much as more traffic than should will end up being directed towards Horley.</p> <p>There will be land take and a permanent acquisition of rights around certain roads, e.g. Woodroyd Avenue, relating to access for construction. This is not common knowledge! These are in residential areas constituting key access points for those in South Horley. In addition, a service road used for bins collections etc. for the local flats will be commandeered, with resulting significant impacts on residents in the immediate vicinity.</p> <p>There is also an access road proposed which will encourage construction vehicles to use the residential Balcombe Road route.</p> <p>It is hard to imagine how the town and its roads will operate during the construction works of the Longbridge Roundabout, which is a major roundabout and often a bottleneck for traffic (any delays here cause major problems in Horley and beyond). Disruption to this site, and at the site of the bridge works, will cause immense problems, for a long time period.</p> <p>Roads in Horley, as in the rest of Surrey, are heavily used and suffer greatly from potholes and other damage. A sustained influx of heavy construction vehicles is going to greatly increase this damage- who is going to cover the cost of remediation?</p> <p>We also have a big problem with speeding along these 'main' yet residential roads in Horley. A large number of big vehicles travelling at excess speed, carrying heavy loads, through residential areas, is a great worry which has not been addressed, especially as we are trying to encourage more active travel in our town.</p>	<p>waste facilities for the local flats, access will be maintained during the construction. Details of access arrangements will be confirmed with relevant stakeholders in advance of construction after the DCO has been granted. This matter is included at Row 2.19.4.5 of the Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council [REP1-044]. The Applicant will continue to engage with Local Highways Authorities on this matter and provide further updates to the SoCG in due course.</p> <p>ES Appendix 5.3.2: Code of Construction Practice Annex 3 - Outline Construction Traffic Management Plan. The main access to the South Terminal Roundabout Contractors Compound will be from South Terminal Roundabout. Direct access from Balcombe Road will be required for limited early access to the land to commence construction of the compound and for workforce private cars prior to completion of the access from South Terminal Roundabout. The Balcombe Road access will also provide access to/from the contractor compound for construction activities at Balcombe Road underbridge, including the new slip roads. The nature of use of this access is described in Section 7.4 of the Environmental Statement Appendix 5.3.1: Buildability Report - Part B - Part 1 [APP-080].</p>
Surface Transport	<p>Horley is significantly, and increasingly, impacted by inconsiderate and dangerous parking related to the airport, for example, airport passengers trying to avoid parking fees by parking in residential roads. This will only get worse with expansion; GAL may be planning more designated parking spaces but people do not want to pay for these.</p> <p>Nuisance parking has knock-on impacts, such as littering and anti-social behaviour. This comes particularly from taxis and hire vehicles which park illegally and whose drivers have been reported urinating in resident parking bays and abusing residents (there has been a recent serious case in Povey</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding taxi / private hire operations and inappropriate off-airport car parking at Section 4.26 of the Relevant Representations Report [REP1-048].</p> <p>GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood. Commitment 8 in the ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out GAL's commitment to provide funding to support local authorities in introducing effective parking controls, monitoring activity on surrounding streets and/or taking enforcement action against unauthorised off-airport passenger car parking. Paragraph 7 of Schedule 3 of the</p>

Topic	Matter Raised	Applicant's Response
	<p>Cross Road where a resident was assaulted). Many of these vehicles are carrying passengers to/from the airport, so we can expect a big increase in such problems following expansion.</p> <p>We may also expect ASB and other related problems (such as the well-documented increase in prostitution and other illegal behaviours) that can result from a high influx of non-local construction and other workers into an area. Nothing has been proposed by GAL to address any of these issues.</p>	<p>draft Section 106 Agreement [REP2-004] secures a contribution paid by the Applicant to Crawley Borough Council for the purposes of off-airport traffic management and/or parking control and enforcement with the intention of limiting unauthorised parking, deterring rat running and maintaining traffic flow.</p> <p>The Project's construction workforce would be contracted professionals, there is no basis for an expectation that they would engage in illegal or antisocial behaviour. ES Chapter 18: Health and Wellbeing [APP-043] Table 18.8.43 notes that 80% of construction workers are expected to be home based, i.e. existing residents. ES - Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] provides the expected distribution of workers. It is therefore not the case that there would be a high influx of non-local construction workers. In any case ES - Appendix 5.3.2: Code of Construction Practice [APP-082] Section 5.10 under "Management Measures" sets out at paragraph 5.10.3 that: Worker Code of Conduct measures will be developed to help mitigate the potential adverse effects of introducing a temporary workforce into the local study by ensuring construction workers conduct themselves in an appropriate manner. The code of conduct will be in line with the Considerate Constructors Scheme (see paragraph 3.2.6).</p>
<p>Water Environment: Water Treatment Works and Flooding</p>	<p>Horley Sewage Treatment Works (HSTW) are at/beyond capacity and regularly 'overtop' raw sewage directly from storm tanks onto public land (this is completely illegal- not the same as permitted discharge into rivers). HSTW 'permitted' discharge levels are also extraordinarily high, and measured water quality very poor, in local rivers (River Mole and tributaries, such as the Gatwick Stream which runs through Riverside Park). Thames Water advise they have plans to bring the site up to permit-level compliance by ~2027 but these works will not increase capacity to accommodate any future growth.</p> <p>There are under construction and proposed housing developments in the area which cannot be accommodated by current TW capacity at local sites, and Gatwick's expansion will greatly add to this pressure. This great concern has not been adequately addressed by GAL.</p> <p>Horley is in a water stress area and it is not at all clear from the proposals how the increased demand for water, resulting from expansion, will be met.</p>	<p>Wastewater</p> <p>Hydraulic modelling of Gatwick's wastewater system was undertaken to inform the assessment of Project impacts reported in ES Chapter 11: Water Environment [APP-036]. This demonstrates that with mitigation measures included in the Project (see Table 11.8.1), Gatwick's wastewater network would have adequate capacity to accommodate the increase in flows anticipated as a result of the Project. The mitigation measures include the reduction in surface water ingress to the wastewater system as a result of network upgrades.</p> <p>The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream treatment works are the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. Thames Water are undertaking an assessment of the impact of the Project on their network and sewage treatment works at Horley and</p>

Topic	Matter Raised	Applicant's Response
	<p>The timing of the proposed flood risk mitigation works will result in a period of increased flooding risk to properties in certain areas around Longbridge. It is unclear what the impacts will be on local ecology, in an area which already experiences frequent and significant flooding.</p>	<p>Crawley. The Applicant has provided an update on this position in response to ExA question WE.1.8 at this deadline (Doc Ref.10.16).</p> <p>Timing of Flood Risk Mitigation Works</p> <p>As reported in the ES Appendix 11.9.6: Flood Risk Assessment [AS-078] the Project will not increase flood risk to other parties for its lifetime taking the predicted impact of climate change into account, this includes during the period of construction. The Project will not increase flood risk to properties in the vicinity of Longbridge.</p> <p>Requirement 23 of the draft DCO states that GAL will prepare a flood compensation delivery plan ahead of their construction at Museum Field and Car Park X for approval by the relevant planning authority in consultation with the Environment Agency. The plan will set out the timing of the proposed FCAs and other fluvial mitigation measures (such as the taxiway syphons) in relation to the construction of Project works that encroach onto the floodplain, to ensure no increase in fluvial flood risk to other parties.</p>
Air Quality	<p>Aircraft are a major source of ultra-fine particles; Horley already has concerningly high levels of UFPs- using WHO guidelines, the number of hours 'high' UFP exposure in Horley is currently greater than that at the kerb of a major road in London. GAL has not included any assessment of UFPs in the application. How will they protect the residents in these areas from even worse air pollution?</p> <p>South Horley is covered by an Air Quality Management Area which includes Riverside Garden Park (which lies directly along the very busy main A23 London Road), so already has issues with air pollution.</p> <p>The modelled air quality data GAL provides is misleading because it does not take into account the recent and increasing improvements derived from reduced road vehicle emissions (which are, in effect, masking the negative impacts of the other air pollution sources). Other areas in the borough with AQMAs, such as Hooley, have seen dramatic improvements in air quality due to a reduction in vehicle emissions. Horley residents deserve similar improvements.</p>	<p>The Applicant has responded thematically at Section 4.3 of its Relevant Representations Report [REP1-048]. Section 4.3 addresses the concerns raised, including concerns that air quality will worsen, assessment of ultrafine particles and compliance with WHO guidelines.</p> <p>The Applicant has responded to air quality within Horley AQMA at Section 3.45 of its Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
Noise	<p>A large housing estate has been built under one of the NPRs and is not protected by the current AIP regulations (like the rest of Horley).</p> <p>All of Horley suffers from airport noise- aircraft overhead and taxiing on the runway this will now significantly increase and the assessments and mitigations, such as the noise envelope, are wholly inadequate.</p> <p>There is now no sound barrier proposed along the A23 boundary with Riverside Park. How is GAL proposing to protect against the already significant traffic noise experienced by visitors to Riverside park, which will only increase with an extra lane, more traffic, more flights, and the removal of the crucial treeline along the main road?</p>	<p>The Applicant has responded to comments on noise impacts and Noise Envelope proposals in the thematic responses provided in Section 4.22 Relevant Representations Report [REP1-048]</p> <p>Please refer to the Applicant's response to Horley Town Council's request for a noise barrier within Riverside Garden Park at Section 3.45 of the Relevant Representations Report [REP1-048]. A summary of the assessment that resulted in the final road traffic noise barriers and the options considered has been prepared in Appendix C - Traffic Noise Barrier Options Selection Report of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref 10.13) submitted at Deadline 3.</p>
General: Site Boundaries and Green Spaces	<p>The removal of a significant tranche of green space along the side of Riverside Garden Park facing the A23, with established vegetation and mature woodland, will have a dramatically adverse impact on the park, ecologically, visually, and auditorily these tree act as a sound, sight and 'psychological' barrier against the very busy A23 London Road, and their removal will totally spoil the park. This area will take 25-30 years to recover but no mitigation has been proposed to reflect this fact.</p> <p>Access through Riverside Park to the airport will be halted during construction works- this is currently a very popular walking/cycling commuting route.</p> <p>Another popular, and historic, green site, Church Meadows, will be lost for recreational uses and fundamentally harmed (with areas lost) during the surface access works.</p> <p>Both of these important green sites have been omitted from the project site description.</p> <p>Grass verges will also be lost, resulting in a less rural appearance in what is already a heavily urbanised area</p> <p>GAL has not quantified the numbers of trees and amount of habitat that will be lost; the plans lack critical detail on protection for trees and ancient woodland buffer zones.</p> <p>Ecological impacts will extend beyond the project site boundary and the approach taken by GAL should address this.</p>	<p>The Applicant has responded to the concerns raised in relation to the effects of the Project on open space at Section 4.2 of its Relevant Representation Report [REP1-048].</p> <p>The location of the proposed replacement open spaces are identified within the ES Project Description [REP1-016] on Figure 5.2.1.g .</p> <p>The Applicant has responded to the concerns raised in relation to landscape and visual effects on open spaces in Section 4.19 of the Relevant Representation Report [REP1-048].</p> <p>The Applicant has responded to the concerns raised in relation to the ecological effects of the Project both within the DCO boundary and at a wider landscape scale in Section 4.13 of the Relevant Representation Report [REP1-048].</p> <p>The location of the Project construction sites which lie within the DCO boundary are shown on Figure 5.2.1.f of ES Project Description [REP1-016] and a description of each area is provided in the Project Description</p>

Topic	Matter Raised	Applicant's Response
	<p>It appears that GAL are proposing construction sites on land that is beyond the red line of the planning application, including in/near Riverside Garden Park and north of the South Terminal roundabout. We need clarification on exactly what areas are being proposed for what, including larger scale accurate maps showing details of the specific proposed land take, layout alterations, tree removals etc.</p>	
Health and Wellbeing	<p>An Equality Impact Assessment (EqIA) has not been undertaken for the project, which seems extraordinary, given its size and scope. This lack means that people are not currently protected against being disadvantaged or discriminated against during the construction or operation phases of the proposal.</p> <p>The way GAL has looked at health impacts completely misses the harm caused to people living adjacent to the A23 London Road once it has been widened and the tree line removed- it does not even include a map of the area!</p>	<p>The Applicant's position on an Equality Impact Assessment is set out in detail in the Deadline 1 Submission 10.9.4, The Applicant's Response to Actions from Issue Specific Hearing 3: Socio-economics [REP1-064], Action Point 6, (pdf pages 4 to 20).</p> <p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] sets out the primary assessment of visual impacts, including related to the highway improvements. ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan [REP2-021], [REP2-023], [REP2-025], and [REP2-027] sets the overarching vision for the Project. Figures 1.2.4 to 1.2.15, [APP-113] show Surface Access Landscape Proposals including replacement planting for vegetation removed during construction. Chapter 18: Health and Wellbeing [APP-043] considers the public health implications of the project and concludes that there would not be significant adverse population health effects. Statutory public health stakeholders agree [RR-4687]: "Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health". ES Chapter 18: Health and Wellbeing [APP-043] paragraph 18.11.22 confirms that the new Community Fund can be used by GAL to provide discretionary support to individuals in local communities, particularly those falling into more than one vulnerable group, who experience particular hardship as a result of in-combination effects of the Project. The expectation is that such cases would be rare, but should they arise, a process is in place to mitigate against severe and inequitable health outcomes.</p>
Consultation and Engagement	<p>I have conversed with many residents about the proposal. Most were not even aware there was a consultation, or had a vague awareness but were not aware of how to attend/engage. A significant number didn't even know there was an expansion planned, and most did not really have any understanding at all about what the project entailed.</p>	<p>Details of the Applicant's consultations are set out in the Consultation Report [APP-218]. The main stages of consultation comprised:</p> <ul style="list-style-type: none"> • A non-statutory consultation ran from 18th October 2018 to 10th January 2019 on the Draft Master Plan 2018. The Draft Master Plan looked at how Gatwick Airport could make best use of the existing runways and infrastructure and meet growing demand for air travel.

Topic	Matter Raised	Applicant's Response
	<p>Those who did attend the 'burger van' event said that the detail was minimal and those hosting could not answer their questions. Most residents found the information difficult to 'make sense of' in real terms, and lacking in crucial detail. The maps were totally rubbish!</p> <p>Overly dense and technical information:</p> <p>Conversely, the documentation provided by GAL on the Planning portal is/was far too detailed/technical/confusing for most 'laypeople' and there is way too much for any average mortal to wade through.</p> <p>Residents need supporting through this process so they have sufficient detail, with honest, directly applicable representation of how things will affect them, in a format they can understand and with the facility to easily ask questions (and get answers). This has not really happened and I feel many people are not able to make an informed decision or effectively engage in the process, and will seriously lose out as a result.</p> <p>The maps are still rubbish!</p>	<ul style="list-style-type: none"> • A statutory consultation ran for 12 weeks from 9th September to 1st December 2021. The consultation set out the key elements required to enable dual runway operations and support increased passenger numbers, along with a PEIR which presented the preliminary findings of the environmental impact assessment of the Project's proposals as at that point in time. It also included information about the economic benefits of the Project, an updated Noise Insulation Scheme, a Homeowners Assisted Moving Scheme, and the proposed approach to construction. • A hybrid statutory/non-statutory consultation ran for six weeks from 14th June to 27th July 2022. A targeted, statutory consultation considered changes to the proposed highway improvement works. The non-statutory Project update that formed part of the consultation included proposed changes to other aspects of the proposals, namely car parking, the airfield, hotels and offices, and the strategies relating to water management, carbon, noise, as well as other Project updates. <p>Details relating to how the consultations were publicised are contained within the Consultation Report [APP-218] and Consultation Report Appendices [APP-223 to APP-244]. This included 'call the expert' telephone surgeries enabling members of the public to request a briefing session with the Project team as well as virtual briefings to explain the Project proposals.</p> <p>Further, the DCO Application includes an ES Non-Technical Summary [APP-217] which has been written in non-technical language and summarises the information contained within the Environmental Statement.</p> <p>Full details of the pre-application consultation carried out by the Applicant is set out in the Consultation Report [APP-218] and its Appendices [APP-219 to APP-244]. The application was subsequently accepted for Examination [PD-001] on the basis that the Applicant had complied with the pre-application procedure requirements under Part 5, Chapter 2 of the Planning Act 2008 and having regard to Adequacy of Consultation representations received</p>

124 Virginia Marion Clemens

124.1.1. Table 124.1 sets out the Applicant's response to the matters raised in the Written Representation from Virginia Marion Clemens [REP1-283]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 124.1 Response to Written Representation from Virginia Marion Clemens

Topic	Matter Raised	Applicant's Response
Greenhouse Gases and Climate Change	The plan would enable substantial increases in numbers of both additional flights and additional passengers travelling to and from the airport. On both accounts the plan is totally inconsistent with the UK's net zero targets and the recommendations of the Committee on Climate Change. As a nation we need to reduce the numbers of flights with immediate effect. We cannot wait for the pipe-dream of zero-emission fuel to be realised in the far distant future.	The Applicant has responded to concerns raised by Interested Parties regarding the impact of the Project on the UK's net zero targets at Section 4.16 of the Relevant Representations Report [REP1-048] – please see the heading ' <i>General issue relating to increased emissions and resulting risk to achieving carbon budgets or Net Zero Target</i> '.
Air Quality and noise pollution	The plan would inflict unacceptable increases in both air pollution and noise pollution on a large number of people in north and mid-Sussex	The Applicant has responded to concerns raised by Interested Parties regarding air pollution and noise at Section 4.3 and Section 4.22 of the Relevant Representations Report [REP1-048] , including measures to mitigation and where possible, reduce air pollution and noise.
Impact on wildlife and landscape	The plan would cause a serious further loss of wildlife habitat in a crowded region of the UK that is already severely depleted. The airport is too close to areas of outstanding natural beauty and scientific importance for this kind of expansion to take place without serious harm.	<p>The Applicant has responded to concerns raised by Interested Parties regarding potential impacts on wildlife at Section 4.13 of the Relevant Representations Report [REP1-048].</p> <p>The impact of the Project on ecology has been fully assessed through the Environmental Impact Assessment process, the results of which are set out in ES Chapter 9: Ecology And Nature Conservation [APP-034]. The assessment process was based on detailed ecology surveys undertaken over a period of four years (2019 to 2023), the results of which are set out in the various appendices to Chapter 9.</p> <p>The assessment process followed good practice guidelines and considered all Important Ecological Resources identified. This includes designated sites, habitats and flora/fauna. No residual significant adverse effects were identified with the overall conclusion of the assessment that the Project would have a net benefit for ecology, as demonstrated by the circa 20% Biodiversity Net Gain.</p>

125 Warnham Parish Council

125.1.1. Table 125.1 sets out the Applicant's response to the matters raised in the Written Representation from Warnham Parish Council [\[REP1-285\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report [REP1-048]**.

Table 125.1 Response to Written Representation from Warnham Parish Council

Topic	Matter Raised	Applicant's Response
Aircraft Noise	Warnham Parish to the north receives 70% of departures in the form of 3 departure routes due to the predominantly westerly wind with the remainder of	Horsham District Council SOCG [REP1-40] paragraph 2.17.2.3 includes detail of the results of noise modelling reported in the ES and the accompanying online air

Topic	Matter Raised	Applicant's Response
	<p>the time arrivals at approx. the low height of 1,500ft. The three departure routes form one route until they pass our parish as vector on to direct headings (route 7,8 and 1). If flown our parish becomes sandwich with an additional route (Wizad) which is not generally flown due to it being over Horsham.</p> <p>This noise is not limited to a straight line (RNAV route) as the noise shadow falls 3 to 5nm (CAP14983) either side of the departing aircraft. Subject to the fleet is very low as heavy from freight, luggage, and passengers. It subsequently vectors north forming two routes and continues west.</p>	<p>noise viewer shows the impact of the northern runway project will not be significant in Horsham. Warnham village is further West of the WIZAD route so will be less effected.</p> <p>The existing WIZAD SID is to be used more in the future baseline, but not so as to require an airspace change. It is not used at night.</p> <p>For daytime, ES Chapter 14: Noise and Vibration [APP-039] Figure 14.6.12 shows the 2032 baseline Leq 16 hr. Warnham is outside the LOAEL. For daytime, ES Chapter 14: Noise and Vibration [APP-039] Figure 14.9.1 shows the 2032 with Project Leq 16 hr, the largest for any future year. Warnham is outside the LOAEL. Warham is also outside the night LOAEL.</p> <p>For daytime, Figure 14.6.3 shows the 2019 baseline N65 contours. Warnham is outside the N65 20 contour indicating less than 20 Lmax events on an average 16 hour summer day. Figures 14.6.14 and 14.9.15 show this remain the case in the 2032, the peak of peak noise impact, with the Project. Hence all primary and secondary noise metrics indicate there will not be significant noise impacts in Warnham.</p>
Aircraft Noise	<p>In 2014 Gatwick flew a concentrated departure flight path (PBNV) trial over our parish, over new communities, which caused extreme anger. It then appeared as three optimal routes for airspace change then called LAMP (FASIS predecessor) as well as a new flight path off a new runway in 2015 (now called the 3rd runway in the Gatwick Master Plan of 2018).</p>	<p>This does not appear to be relevant to noise impacts from the NRP.</p>
Aircraft Noise	<p>WPC would not be included in the noise envelope offered for this new runway. WPC would not be in the insulation or compensation area and yet our parish will be significantly impacted by continuous aircraft noise day and night with little, if any, let up. The noise envelope does not accommodate FASIS or take onboard the growth Gatwick is progressing currently through FASIS (stage 3 having produced a very poor consultation process with undecidable maps)</p>	<p>The Noise Envelope limits set in terms of the daytime and night-time LOAEL noise contours. The measures taken to minimise and reduce noise to meet these limits will benefit areas both inside and outside of these contours including Warnham.</p> <p>The FASI-S airspace change proposals are following a separate process to assess their environmental impacts.</p>
Aircraft Noise	<p>FASIS should be included in this process as at present this is kept a secret from residents to the full scale of growth Gatwick seeks – the Master Plan of 2018 detailed main runway through modernisation of airspace will increase aircraft movements by 55,000 flights a year going from 285,000 flights a year (pre Covid) to 340,000 by 2033 – adding approximately 61m extra passengers</p>	<p>The FASI-S airspace change proposals are following a separately regulated process to assess their environmental impacts.</p>

Topic	Matter Raised	Applicant's Response
	<p>to the 46m preCovid. With a new 2nd runway seeking to add 101,000 extra flights a year.</p> <p>The maps as said having been poor, but we include a map having written the word 'Runway' in to help. This clearly show our parish will be hit the hardest as under much of the green departure routes desired to fit in with other airport growth plans for airspace.</p>	
Aircraft Noise	<p>The Gatwick Noise Management Board has been dominated by noise groups that seek to move arrivals over those closer to the runway. At present arrivals have the minimum join of 8nm day and 10nm night. If this was moved closer to the runway, as the results of the NMB study provided, it would fly over our parish frequently at less than 1,500ft, using flaps, wheels down and gears to take speed off quickly due to lack of distance to landing plus turning sharply which also increases aircraft frame noise.</p> <ul style="list-style-type: none"> • No research has been evident from the Gatwick submission to the impact two runway increase will have on our parish. • No evidence is provided to how this will be mitigated with one or two runway expansion. • As such we strongly oppose this new runway. 	<p>The references to the functioning of the Noise Management Board are not relevant to the NRP, so the Applicant has not responded to them.</p> <p>The noise impacts of two runway operation have been fully assessed in the ES, and the impacts on Warnham are predicted to be not significant. Mitigation measures are included to minimise noise impacts on all communities where identified to be required to be provided.</p>
Waste	<p>As a parish we have three waste sites as neighbours as such we are very concerned by the potential increase in waste from a 2-runway airport as Gatwick propose to change the incinerator to a waste sorting site.</p> <p>The consultation leaflet, which we have now acquired, did not provide any detail to the volume of waste expected from a two runway operation with 365,000 planes and 80m passengers plus 14,000 workers; it did not provide any breakdown to the type of waste or where it will be transported to; it did not detail increase in lorry movements however we have now obtained details from reading the GATCOM steering group report (24.1.24) that states Gatwick as detailing 5 to 8 extra lorries a day by 2025 and 15 by 2049. No detail of the size of lorry or data to the traffic modelling conducted by the airport to reach these figures is provided. As such we would ask that waste be a subject included in the hearings as well as air quality as we believe our parish will suffer due to the increase in traffic on the roads.</p>	<p>The forecast volumes of operational waste on completion of the Project are set out in the Operational Waste Management Strategy (Doc Ref. 10.12) submitted at Deadline 3. The waste forecasts do not take into account the waste minimization measures that will be implemented as part of the Operational Waste Management Plan and the waste initiatives in the Airport's Second Decade of Change.</p> <p>The Operational Waste Management Strategy (Doc Ref 10.12) also describes the current practices at the Airport in terms of how waste is managed and provides targets for diverting waste from landfill.</p>

Topic	Matter Raised	Applicant's Response
Air quality	<p>Many in our parish must drive to reach shops, bus stops and trains as such we cannot reach Gatwick Airport by public transport. We believe this can only lead to a decline in air quality for our parish. Along with the proposed (planning already agreed) incinerator if indeed this is to process the airport's waste as with the Biffa and Britanniacrest recycling sites for residential and commercial as well as the Biffa biomechanical digester. These potentially all lead to lorries on rural lanes, parked roadside due to driving rest periods, and waste roadside from the passing lorries. As Gatwick has significant food waste we are concerned about smell and vermin – flies, birds, and rats. We detail this as no detail were offered in the project change consultation operate over the Christmas period</p>	<p>The Applicant has responded to concerns that air quality will worsen as a result of the NRP and concerns on the assessment of the biomass boiler at Section 4.3 of its Relevant Representations Report [REP1-048].</p>
Surface Transport	<p>As said our parish is a cut through area for vehicles, including lorries, to avoid congestion on the A24 and A29 as such, perhaps not immediate consequences of a 2 runway airport, but consequently we are concerned the added traffic that the Horsham area will have to withstand with no investment will lead to more cut through traffic passing homes and children walking to school with no pavements.</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding Traffic and Transport at Section 4.26 of the Relevant Representations Report [REP1-048].</p> <p>Comprehensive strategic modelling has been undertaken (see Chapter 12 of the Transport Assessment [AS-079]), which has informed the assessment in ES Chapter 12: Traffic and Transport [AS-076]. The extent of the modelling includes the Warnham Parish Council area. ES Chapter 12: Traffic and Transport [AS-076] includes assessments on effects related to severance and pedestrian amenity, in accordance with Institute of Environmental Management and Assessment (IEMA) guidance. A further review has been undertaken to take into account the updated IEMA guidance (Technical Note: Impact of Latest IEMA Guidance (2023) on the Assessment of Effects Related to Traffic and Transport [AS-119]). The assessment shows that the Project is not expected to have any significant adverse impacts in the Warnham Parish Council area.</p> <p>The Applicant is committed to work with suppliers to ensure that airport-related HGVs use the strategic road network. For construction, measures will be taken through a Code of Construction Practice and Construction Traffic Management Plan to ensure that heavy traffic related to construction of the Project uses designated routes agreed with the local authorities.</p>
Health: Access to Redhill Hospital	<p>Redhill Hospital is our main hospital as such residents/ ambulances drive via the M23, an unsafe smart road, and A roads pass Gatwick Airport through residential roads of Crawley. There are no buses from our parish to the hospital or direct trains. With the increase in flyers, workers, SAF fuel lorries, and freight on these roads we are concerned our residents will be impacted by the</p>	<p>The Applicant has responded thematically to comments made within relevant representations regarding traffic impacts, at Section 4.26 of its Relevant Representations Report [REP1-048].</p>

Topic	Matter Raised	Applicant's Response
	increased congestion on the hospital's single access road (A23). Gatwick is only funding the new road outside it's terminals	
Socio-Economics - Housing	<p>Gatwick Airport's local authority - Crawley Borough Council - can't meet its housing need now as such is placing considerable pressure already on neighbouring councils to assist. The Horsham area does not have any green belt designation.</p> <p>There is a lack of affordable housing in the Horsham area as such we are concerned that our rural parish will face greater pressure to assist in providing more housing as it sits adjacent to Horsham. We feel the shortage of affordable housing should be addressed in relation to this application as should lack of healthcare, school places, and amenity provision.</p>	The Applicant has provided an assessment of impacts on housing during the construction and operational phases within ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]. The Applicant has also provided a response concerning the declaration of a Housing Emergency by Crawley Borough Council within The Applicant's Response to Actions ISH2-5 [REP2-005] ISH3 Action Point 4.
Socio-Economics - Housing	The new housing included already in the Horsham District Council local plan would fall under the new flight path that Gatwick Airport is seemingly to select in the FASIS mapping. This sit is in the parish Neighbourhood Plan as such due to take the full growth of our housing need. These homes would not be under and receive any compensation for loss of house value, quality of wellbeing under the FASIS scheme or this DCO.	The Applicant has justified its position regarding an assessment of property price impacts within Table 17.4.2 of Environmental Statement Chapter 17: Socio-Economic [APP-042]. The Applicant has further explained its position in response to ExA question SE.1.13 (Doc Ref. 10.16).

126 Warren Leonard Rainforth

126.1.1. Table 126.1 sets out the Applicant's response to the matters raised in the Written Representation from Warren Leonard Rainforth [REP1-286]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048].

Table 126.1 Response to Written Representation from Warren Leonard Rainforth

Topic	Matter Raised	Applicant's Response
Support	I fully support the application.	Noted. The Applicant welcomes support for the Project.

127 West Sussex County Council

127.1.1. Table 127.1 sets out the Applicant's response to the matters raised in the Written Representation from West Sussex County Council [REP1-107]. Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [REP1-048], the **Applicant's Response to Local Impact Reports** (Doc Ref. 10.15) and the **Statement of Common Ground between Gatwick Airport Limited and West Sussex District Council** [REP1-033].

127.1.2. The Applicant also considers that both the Local Impact reports of the West Sussex Authorities and the written representations of the authorities, including Mid Sussex, are notable for the fact that they do not acknowledge or apply the terms of national policies for aviation, which are at least important and relevant and which should provide a balanced framework for the consideration of the application. Accordingly, **Appendix A** of this Response sets out those policy matters which the Applicant considers should have been acknowledged in the Written Representations and to which significant weight should be attached in any attempt to strike the planning balance in this case.

Table 127.1 Response to Written Representation from West Sussex County Council

Topic	Matter Raised	Applicant's Response
Forecasts	<p>WSCC cannot support the NRP DCO application in its current form, because there are a number of matters of significant concern that have not been satisfactorily addressed to date by the Applicant including understanding the basis for passenger forecasts and the assumptions that underpin them.</p> <p>Justification for supporting infrastructure and its necessity to facilitate the required passenger throughput</p>	<p>The Applicant's position is set out in its Needs Case Technical Appendix [REP1-052] to which the Joint authorities have not yet responded. The Applicant has also explained its case further in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15). The Applicant is hopeful that some elements of common ground can be established through the continuing dialogue with the JLA's advisers.</p>
General: Project Infrastructure	<p>Lack of evidence regarding the assessment of alternatives for Project infrastructure and how the set of design principles will ensure a secured approach to good design, particularly for the Central Area Recycling Enclosure (CARE facility) and highways works.</p>	<p>The Applicant has responded to points raised regarding control of design at Section 4.21 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
General: Construction Impacts	<p>Lack of clarity about the construction phase and potential impacts and mitigation - concern about lack of phasing information to enable local communities and WSCC to understand if the impacts have been appropriately addressed and mitigated, given that the duration of the construction programme (up to 14 years).</p>	<p>The Applicant has responded to points raised regarding socio-economics at Sections 4.15 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
Socio-economics	<p>Clarity on the socioeconomic benefits, including the number, type, quality, and location of jobs created, the link between current labour supply and jobs created, and local economic benefits.</p>	<p>The Applicant has responded to points raised regarding construction at Sections 4.14 and 4.18 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).</p>
Traffic and Transport	<p>Concerns related to traffic and transport, including the impact of other strategic development, and forecasting assumptions about mode share for both passengers and staff. There is insufficient evidence and mitigation to demonstrate if target mode share percentages for staff and passengers can be met and that suitable controls are in place should the modal split targets not be met.</p> <p>A. The proposals would increase some journey times (including potentially for emergency response vehicles) and result in a redistribution of traffic, including from the strategic to the local highway network;</p> <p>b. Insufficient justification has been provided for proposed speed limits on the local road network and, in lieu of the submission of a Stage 1 Road Safety</p>	<p>The Applicant has responded to West Sussex County Council's detailed concerns in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15). Comprehensive strategic modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 of the Transport Assessment [AS-079]) which takes into account any distribution of traffic. VISSIM microsimulation modelling has been undertaken (see Chapters 13 of the Transport Assessment [AS-079]) which includes the North Terminal junction. Based on the modelling work, the Project is not expected to result in significant adverse effects which require mitigation additional to the highway works surface access improvement works as part of the Project.</p> <p>The proposed speed limits on A217, Povey Cross Road and A23 Brighton Road are to be retained as existing. The proposed speed limit on A23 London Road</p>

Topic	Matter Raised	Applicant's Response
	<p>Audit, it has not been demonstrated that the road safety implications have been fully considered. It is also not apparent what design standards have been applied to highway works or whether they accord with the relevant standards (as no design review has been submitted); and</p> <p>c. Further modelling information is required to fully assess the transport implications, from a capacity perspective, on the local road network and specifically relating to the North Terminal signalised junction.</p>	<p>would be reduced (from 50mph to 40mph) and accords with the WSCC Speed Limit Policy. The characteristics of the northern section of A23 London Road most closely align with the West Sussex Speed Limit Policy's Functional Hierarchy category for 40mph roads described as "through traffic routes (single or dual carriageway) in partially built-up areas with segregated VRU facilities and limited frontage accesses or junctions."</p> <p>It is expected that the proposed speed limit reduction together with the change in characteristics of the road and other measures such as the introduction of the signalised junction and appropriate signage would encourage reduced speeds on the road without the need for further speed enforcement measures. The speed limit reduction is considered likely to result in safety benefits for all road users including active travel users on A23 London Road and the associated junctions including Longbridge roundabout, the new signal junction with North Terminal Link and the A23 London Road / Perimeter Road North / Queensgate signalised junction.</p> <p>Design reviews have been undertaken as part of technical engagement with West Sussex County Council. The design standards being used have also been discussed as part of technical engagement and can be found as part of the Application in Section 6.11 of the Design and Access Statement - Volume 5 [APP-257] and for the active travel design in the technical note on Active Travel Provision Details which can be found as part of Appendix A in the Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP 1-065].</p> <p>The Stage 1 RSA and Stage 1 RSA Designer Response in Draft has been issued to WSCC for review and comment, with WSCC returning comments on 24/05/2023. The final Stage 1 RSA Designers Response and agreement of RSA actions is the subject of ongoing engagement with the highway authorities and is currently an outstanding matter at Row 2.20.3.1 of the Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council [REP 1-033]. The Applicant will continue to engage with West Sussex County Council on this matter and provide further updates to the SoCG in due course.</p>
Noise and Air Quality	Further presentation of the required evidence base and justification of the noise and air quality effects (and proposed mitigation) from both construction of the additional infrastructure and the operational phase (including the increase in overflights).	It is not clear what further evidence is requested. Chapters 13 and 14 of the ES provide full assessments of air quality and noise impacts expected and mitigation proposed where necessary in accordance with relevant policy and guidance.
Greenhouse Gases	Concerns about the significant increase in greenhouse gas emissions and impacts on climate change, and understanding how airport expansion can be	These matters are addressed extensively above and Section 4.13 in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).

Topic	Matter Raised	Applicant's Response
	justified in the light of national and international carbon reduction targets (along with concerns over fundamental flaws in the assessment undertaken).	
Ecology: Sensitive Species and Habitats	<p>a. Concern is raised about the extent of vegetation that would be lost (primarily along the road corridor), which is significant and its effects on ecosystem service benefits and the loss of connectivity at a landscape scale;</p> <p>b. A 14-year construction programme will prolong the impacts of habitat loss and, in some locations, mitigation will not be in place until the end of the construction period. It is not clear if the limited areas identified for environmental mitigation and enhancement will adequately compensate for the significant loss of habitat; and</p> <p>c. The River Mole crossings, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology.</p>	The impacts of the Project on trees, habitat loss and ecology are discussed in further detail in response to the points raised by the West Sussex Authorities at Section 4.6 of The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
Environmentally Managed Growth and Mitigation	<p>Of particular concern, is the lack of sanction should the continued development growth of the airport, which is envisaged, give rise to consequences that exceed expected environmental parameters without any clear accountability to the Local Authorities or the local community. The proposals to mitigate impacts of airport growth should be delivered following the environmentally-focused principles of 'Green Controlled Growth', as proposed in the recent Luton Airport DCO.</p> <p>The West Sussex LIR identifies wide-ranging adverse impacts across all topic areas. There are concerns about the limited scope and scale of environmental mitigations (and the control mechanisms set out in the draft DCO (dDCO) to secure these) and community compensation in light of the likely adverse effects arising from the Project. These concerns are reflected in the significant gap in expectations that currently exist between the Applicant and WSCC.</p>	<p>GAL recognizes that commitments to mitigation need to be clear and enforceable. It does not, however, recognise the appetite for "sanctions."</p> <p>National policy is clear on the appropriate approach to planning requirements and obligations.</p>
General: Enhancement Measures	The need for enhancement measures (including to Public Rights of Way, recreational facilities, and ecological habitats)	These matters are addressed at Sections 4.6, 4.8 and 4.14 in The Applicant's Response to the Local Impact Reports (Doc Ref. 10.15).
Waste: Resource Implications	WSCC is also concerned that there would be a significant future resource implication for the discharge of the relevant DCO Requirements (given WSCC's statutory functions as Waste Planning Authority, Local Highway Authority, and Lead Local Flood Authority), within the expected deadlines and the associated monitoring responsibilities associated with the DCO. WSCC would expect full cost recovery to resource these additional demands, as well as associated	Paragraph 3 of Schedule 11 of the draft DCO [AS-004] requires the undertaker to pay a fee to the relevant discharging authority where it makes an application to a discharging authority in respect of a DCO Requirement in Schedule 2 of the draft DCO. Schedule 11 also sets out the prescribed level of these fees. Where an

Topic	Matter Raised	Applicant's Response
	agreements to ensure that appropriate and funded pre-requirement discharge discussions take place.	<p>application is made to WSCC for its agreement or approval pursuant to a DCO Requirement, WSCC will receive the relevant fee.</p> <p>Specifically in relation to local highway works for which WSCC is the relevant highway authority, Article 21 to the draft DCO [AS-004] requires the undertaker to enter into a highways agreement with WSCC prior to the works commencing. These agreements "may contain such terms as to payment and other matters as the parties consider appropriate; including such matters as may be included in agreements made pursuant to section 278 or section 38 of the Highways Act 1980" (Article 21(2)(a)).</p>

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128.1.1. Table 128.1 sets out the Applicant's response to the matters raised in the Written Representation from William Packham [\[REP1-288\]](#). Where relevant, the Applicant has provided direction to the relevant rows of the Applicant's **Relevant Representations Report** [\[REP1-048\]](#).

Table 128.1 Response to Written Representation from William Packham

Topic	Matter Raised	Applicant's Response
Noise	<p>The planes at the moment fly directly over my home at very low altitude and are already very loud.</p> <p>This has a direct, negative, affect on my property value and saleability and an increase in air traffic, whilst doing nothing about the noise levels the aircraft produce, will only damage this further and cost me a vastly substantial amount of money in my properties value.</p>	The Applicant has responded thematically to comments made within relevant representations regarding noise effects, and the associated socio-economic impacts at Section 4.22 of the Relevant Representations Report [REP1-048] , with compensation set out at Section 4.7 of the report.

129 References

Institute of Environmental Management and Assessment (2020) Climate Change Resilience and Adaptation.

Met Office (2018) UK Climate Projections UKCP18 Science and user guidance reports.