



# Gatwick Airport Northern Runway Project

## The Applicant's Response to Local Impact Reports

### Book 10

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## 1 Introduction

### 1.1 Overview

- 1.1.1 The Applicant's Response to the Local Impact Reports has been prepared for Deadline 3 of the examination phase for the proposed Gatwick Northern Runway Project (NRP). 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 This document has been prepared to provide a response to the Local Impact Reports (LIRs) submitted by the Local Authorities at Deadline 1.
- 1.1.3 Five LIRs have been submitted by the Local Authorities. In some cases, joint LIRs have been prepared based on the county authority area. The LIRs comprise:
- East Sussex County Council LIR [[REP1-070](#)]
  - Joint Surrey Councils LIR (Surrey County Council, Mole Valley District Council, Reigate and Banstead Borough Council and Tandridge District Council) [[REP1-097](#)]
  - Joint West Sussex Councils LIR (Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council) [[REP1-068](#)]
  - Kent County Council [[REP1-079](#)]
  - Sevenoaks District Council [[REP1-095](#)]
- 1.1.4 This document does not seek to respond to every element of the LIRs but rather to focus on the principal points cited by the Local Authorities. This document also seeks to comment on any matters that may require clarification or correction where it may assist the ExA and Interested Parties.
- 1.1.5 Where elements of the LIRs have already been addressed within the Applicant's submitted documents (for example, the Statements of Common Ground), the Applicant has provided signposting.

## 2 East Sussex County Council

### 2.1 Overview

2.1.1 This section sets out the Applicant’s response to the points raised within the Local Impact Report submitted by East Sussex County Council [[REP1-070](#)]. The Applicant has retained the headings and structure of the Local Impact Report below.

### 2.2 Noise and Vibration

2.2.1 The following table sets out the Applicant’s response to matters raised on Noise and Vibration.

**Table 2.1 The Applicant’s response to matters raised on Noise and Vibration**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
N1	Aircraft noise on local communities	O	Negative	<p>Although aircraft noise is audible in Wealden District, it is not of sufficient magnitude to result in adverse effects on health and quality of life. Whilst we acknowledge this assessment, we remain cautious of the impacts of aircraft noise on local communities, particularly in Wealden – and wish for our concerns to be recorded in the event unacceptable levels of noise are recorded in the future.</p> <p>Of greatest concern would be if aircraft operated on the northern runway between the hours of 23:00 and 06:00. ESCC notes Requirement 19(3) provides that the northern runway must not be routinely used between the hours of 23:00 – 06:00; however, it can be Used between those hours when the southern runway is not available for any reason.</p> <p>ESCC is not satisfied with the requirement and considers “routinely” should be omitted</p>	Wealden Local Plan (1998) ‘saved’ Policy EN27 Environment - Adopted Wealden Local Plan The High Weald AONB Management Plan 2019-2024 Objective OQ4	<p>The Applicant has updated the cited requirement (now numbered Requirement 19(2)) in version 6.0 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1 v6) submitted at Deadline 3 to remove the word “<i>routinely</i>” given that this does not alter the meaning of the provision.</p> <p>However, it is important that the Applicant is able to continue to use the northern runway when the southern runway is unavailable for reasons other than planned maintenance or engineering works and for this purpose “for any reason” must be retained. For example, if there was an incident on the southern runway or damage to that runway, the Applicant would use the northern runway as it does currently using the same flight paths. This would not result in any increase of movements and associated noise within those hours by comparison to use of the southern runway.</p> <p>The Council’s proposed wording in this respect is unduly restrictive, and it is not agreed that the form of words used in Requirement 19(2) lacks precision or would</p>

				<p>because it is vague and so unlikely to satisfy the test of precision in Circular 11/95: Use of conditions in planning permission. In addition, the term “for any reason” is too broad and ESCC considers the use of the northern runway between these times should only be used when the southern runway is not available because of planned maintenance and engineering works.</p> <p>In the light of the above, ESCC considers Requirement 19(3) should be redrafted as follows –</p> <p>“The northern runway (Work No.1) must not be 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 of this Order is made) is not available for use because of planned engineering and maintenance works”.</p>		<p>result in any instance of unassessed impacts arising.</p> <p>The central purpose of Requirement 19(2) is to ensure that only one runway will ever operate between 23:00 – 06:00, and the southern runway will continue to be the primary runway which is used during those hours, preserving the status quo. The current wording achieves this.</p>
<b>N2</b>	A22 road traffic noise	O	Negative	<p>Providing alternative public transport options to private car use would reduce the number of vehicles on the road network to Gatwick Airport, and therefore reduce road traffic noise.</p> <p>For public transport improvement (mitigation) please refer to Table 5 (T1) of the LIR.</p>	<p>East Sussex Local Transport Plan 3 paragraph 3.11</p> <p>Draft East Sussex Local Transport Plan 4 Objective 2</p>	<p>The Applicant is committed to supporting alternative transport options to private car use and we have made binding requirements on mode shares under the DCO. These are set out in the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> <a href="#">[APP-090]</a> document.</p>

## 2.3 Socio-Economic

2.3.1 The following table sets out the Applicant’s response to matters raised on Socio-Economics.

**Table 2.2: The Applicant’s response to matters raised on Socio-Economics**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
S1	Impact on employment and skills and meeting local needs.	O	Currently Unknown	<p>Paragraph 1.1.7 of the Employment, Business and Skills Strategy (ESBS) states its activation would be set out within an Implementation Plan which “would describe, in detail, how GAL will collaborate with partners to deliver the ESBS. The Implementation Plan would be developed pursuant to the agreement of ESBS mitigations. The ESBS Implementation Plan will be secured via the Section 106 agreement”. We would suggest this is made a condition of the DCO should it receive consent from the Secretary of State.</p> <p>It is imperative that ESCC has access to the Implementation Plan to be able to determine whether the proposals will have a negative, neutral or positive impact. The ESBS currently lacks detail and does not, for example, mention initiatives tailored for local needs.</p> <p>ESCC notes from paragraph 5.3.26 of the ESBS that GAL is currently working with “the Coast to Capital LEP Careers Hub to ensure young people in [GAL’s] region have access to employer insight and understand the potential opportunities open to them”. ESCC is pleased to note GAL’s work with the Careers Hub and requests confirmation as to how that work will continue and be secured in the Implementation Plan.</p>	East Sussex Economy Recovery Plan: East Sussex Reset	<p>There are no significant adverse impacts on skills or business identified in the <b>ES Chapter 17: Socio-Economic</b> [APP-042]. As such there are no impacts that require mitigation. Section 17.8 of the ES Chapter lists the ESBS as enhancement activity and paragraph 17.13.5 reads:</p> <p><i>“moderate beneficial significant labour market effects have been identified during the operation of the Project from 2032 to 2047 at the LSA and FEMA levels. These effects would be subject to further enhancement measures as part of the ESBS. No significant adverse effects have been identified in terms of socio-economic effects.”</i></p> <p>Paragraph 1.1.7 of the ESBS should read “activities” rather than “mitigations”.</p> <p>In the context of the above response, it is appropriate for the ESBS to remain secured as a s106 obligation rather than a DCO Requirement.</p> <p>A draft Implementation Plan has been shared with ESCC and the Applicant is continuing to work with ESCC and other local authorities to develop the draft, including tailoring delivery to local needs and including specific measures such as work with Careers Hubs. A copy has been submitted at Deadline 3 (<b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11)).</p> <p>The governance of the ESBS includes a proposed multi-agency Steering Group that will approve the</p>



				<p>ESCC is interested in how the ESBS will be governed and considers it would be helpful if the Implementation Plan provided was governed by a multi-agency board.</p> <p>Commitment required to the setting up of a multi-agency board for the ESBS. This is to ensure East Sussex's needs and requirements are taken into consideration when developing business, skills and employment opportunities, so that these benefit neighbouring authorities in addition to adjoining authorities. Suggest this is made a condition of the DCO. This will need to take into account the East Sussex Economic Strategy currently being developed.</p>		Implementation Plan and oversee its delivery.
<b>S2</b>	Increased tourism to East Sussex	O	Positive	<p>Promoting tourism is mentioned in the ESBS. ESCC would encourage GAL to ensure there is a sustained promotion of East Sussex at the airport to support the visitor economy. ESCC require continued discussions with GAL to see how this can be achieved, and for any requirements to be included in the ESBS Implementation Plan.</p>	<p>East Sussex Cultural Strategy 2013 - 2025</p> <p>East Sussex Economy Recovery Plan: East Sussex Reset</p>	<p>One of the six themes of the ESBS is regional promotion, including tourism. The Applicant is continuing to meet with East Sussex and other local authorities to agree how to deliver the theme. More detail has been provided in the <b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11) submitted at Deadline 3.</p>
<b>Section 2.2</b>	<p>All boroughs and districts are expected to continue to experience population growth according to the 2021 Census.</p> <p>This population growth increases the need for housing, accessible transport, jobs, healthcare,</p>	O	Negative			<p>Noted. The Applicant has addressed population and housing effects during the construction and operational phases of the Project within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b>. This takes account of forecast growth.</p>

education and learning provision in addition to the creation of places where people are proud to live, work and visit.					
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## 2.4 Greenhouse Gases (Carbon)

2.4.1 The following table sets out the Applicant's response to matters raised on Greenhouse Gases (Carbon).

**Table 2.3: The Applicant's response to matters raised on greenhouse gases**

Ref No.	Description of Impact	Construction I / Operation TT2 (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
C1	The whole-life carbon assessment presented by the GAL in the Greenhouse Gases Chapter [APP-041] of the Environmental statement is non-compliant with the IEMA GHG assessment methodology defined in the ES, which specifies "The assessment must include all material emissions (defined by magnitude, see Section 5.3, Step 3 for the exclusion	C & O	Negative	Under the IEMA GHG Assessment methodology used in the Environment Statement (ES), GAL is required to update the carbon assessment and assess all material emissions over the whole life of the proposed Scheme. If an exclusion is undertaken, this must be evidenced and be <1% of total emissions, and where all such exclusions total a maximum of 5%.	The Airports National Policy Statement  Aviation Policy Framework	<p>This issue is connected to the question of Well-to-tank emissions included in the referenced impacts below and the two issues are responded to together here.</p> <p>Within Section 2.11.2.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039] it is noted that the assessment has sought to develop a methodology to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of 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.</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</p>

	<p>threshold), direct or indirect (based on the point above), during the whole life of the proposed project. The boundary of the assessment should be clearly defined, in alignment with best practice”.</p>					<p>established.</p> <p>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 <b>ES Chapter 16: Greenhouse Gases [APP-041]</b> (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 <a href="https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes">https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes</a>) 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</p>
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						<p>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>
<b>C2</b>	<p>GAL has not reported well-to-tank (WTT) emissions, which has resulted in the Applicant under-reporting aviation emissions by around 20%, which would result in 1,106,530tCO<sub>2</sub>e not being accounted for in 2028 alone during the most carbon-intensive year, where 5.327 MtCO<sub>2</sub>e was estimated to be released.</p>	O	Negative	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES. Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions and</p>	<p>NA</p> <p>The Airports National Policy Statement</p> <p>Aviation Policy Framework</p>	<p>Please see the response to C1 above.</p>
<b>C3</b>	<p>There were inconsistencies identified in GAL's assessment methodology since it was identified that GAL in the ES did not account for WTT emissions during construction.</p>	C	Negative	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES.</p> <p>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions and where all such exclusions total a maximum of 5%.</p>	<p>NA</p> <p>The Airports National Policy Statement</p> <p>Aviation Policy Framework</p>	<p>Please see the response to C1 above.</p>

<b>C4</b>	GAL did not properly account for the impact of construction materials being imported from outside the UK. While GAL used the RICS guidance to estimate emissions from transport no global shipping of materials and equipment delivered to the Scheme was accounted as per RICS guidance.	C	Negative	GAL needs to update the transport assessment in compliance with the RICS methodology quoted in the ES to ensure shipping transport emissions are accounted for. This can then be used to inform appropriate transport efficiency mitigation measures as part of the ES Appendix 5.4.2: Carbon Action Plan [APP-091].	NA  The Airports National Policy Statement  Aviation Policy Framework	Please see the response to C1 above.  At this stage the likely geographic source location for materials is not known. The assessment of GHG has assumed UK sourcing of materials with an average transport distance based on RICS guidance, considering an appropriate estimate of those materials sourced locally and those sourced nationally.  With regards to quantification of impacts from construction of infrastructure – the majority of emissions are large quantities of bulk materials (aggregate, concrete etc) which will predominantly be sourced locally. While it might be expected some small portion (by mass) may be sourced outside the UK this is likely to be minor in comparison to the large quantities of bulk materials. Any underestimation would, therefore, be small and unlikely to be material to the conclusions of the assessment.  The quantification of impacts from construction of buildings is based on typical embodied carbon metrics per m2 of floor area, within which a proportion of local, national, and international sourcing is already included.  Assumptions used within the construction assessment are set out in <b>ES Appendix 16.9.1: Assessment of Construction Greenhouse Gas Emissions</b> [APP-191].
<b>C5</b>	GAL only proposed using a PAS 2080:2023 certified Principal Contractor and did not propose implementing PAS 2080:2023 during the early design phases where there is the	C	Negative	One of PAS2080:2023’s foundational principles is that the earliest you implement it during the design process, the more likely it is that carbon can be reduced in the design. Hence, in alignment with this principle, GAL should implement PAS 2080:2023 with immediate effect within the design process to maximise carbon-saving opportunities.	N/A  Aviation Policy Framework  PAS 2080 (2023) Global Standard	Part of the commitment in the CAP is that the Applicant commits to being PAS 2080: 2023 certified as the asset owner. This means that the design stages will be covered by the approach set out in PAS 2080.  In response to these comments, the Applicant has submitted the <b>Construction Carbon Management Strategy</b> (Doc Ref. 10.18) at Deadline 3 which sets out the work already undertaken and that planned to embed its approach to low carbon in construction into all

	opportunity to save most of the carbon.					relevant actions.
<b>C6</b>	Under <b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090] GAL does not set out any commitments to support providing infrastructure or services to help decarbonise surface Transport emissions.	O	Positive	GAL should provide passive provision of charging infrastructure within the Airport to support the anticipated uptake of electric vehicles.	NA  Emerging East Sussex Electric Vehicle Strategy  Local Transport Plan 4	The <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> [APP-090] set out how the Applicant's commitments to sustainable travel are binding under the DCO. Achieving the modes shares set out will significantly reduce surface transport emissions. Furthermore, the Applicant has invested or pledged over £1m to Metrobus in hydrogen buses for the local network serving the airport and has introduced an electric vehicle charging forecourt on airport. We are continuing to invest in charging infrastructure for passengers and staff within a wider strategy for EVs on the campus as part of our Decade of Change programme independent of the DCO. Decarbonisation of all surface transport is a matter for Government policy and the Applicant cannot mandate that all surface access journeys are by zero emission vehicles ahead of meeting those policy targets.
<b>C7</b>	ESCC expect new non-domestic buildings to achieve BREEAM Excellent (for water and energy credits) where technically and financially viable.  Currently, GAL only proposes to do a cost-benefit study, including an analysis BREEAM.	C	Negative	If concluded technically and financially viable in the cost-benefit study, ESCC expect that GAL will implement BREEAM Excellent certification (for water and energy credits) into the scheme.	NA	Sustainability accreditation schemes are one way of achieving sustainable outcomes in construction. Different schemes are available for different types of assets and covering different sustainability issues. GAL will consider whether the use of sustainability accreditation schemes will result in sustainability outcomes that may otherwise not be achieved.
<b>C8</b>	GAL details in the ES Appendix 5.4.2: Carbon Action Plan [APP-091] commitments to use	O	Positive	GAL should explore options to support offsetting through planting local vegetation by funding the Local Nature Recovery Strategy to help offset the scheme's emissions and	N/A	At Gatwick today, through its Airport Carbon Accreditation Level 4+, the Applicant buys offsets covering residual Scope 1 and 2 GHG emissions (as well as business travel).

	<p>internationally recognised offsetting schemes (CAP Para 1.1.4). Within the CAP GAL also commits to investment in carbon removal mechanisms in preference to commonly used offsetting mechanisms. However, no formal commitment has been made to support local vegetation planting to help offset emissions associated with the scheme.</p>			<p>enhance biodiversity/ecosystem health and nature recovery.</p>	<p>In order for the Applicant to maintain its ACA certification, any offsets – removal and/or reduction – must be bought from schemes accredited by the ACA.</p> <p>ACA is the only global, airport-specific carbon standard which relies on internationally recognised methodologies. It provides airports with a common framework for active carbon management with measurable goalposts. The programme is site-specific allowing flexibility to take account of national or local legal requirements, whilst ensuring that the methodology used is always robust</p> <p>Details of Level 4+ available on the ACA website: <a href="https://www.airportcarbonaccreditation.org/about/7-levels-of-accreditation/">https://www.airportcarbonaccreditation.org/about/7-levels-of-accreditation/</a></p> <p>With a view to achieving Net Zero for Scope 1 and 2 GHG emissions by 2030 (under both its existing Decade of Change commitments, and the equivalent under the Carbon Action Plan as part of the Project), the Applicant is in the process of transitioning from use of carbon reduction offsets to carbon removal offsets instead (as the use of carbon removal offsets would not meet the definition of Net Zero). For 2023, GAL purchased 25% removal offsets and 75% reduction offsets.</p> <p>Furthermore, the Applicant is investigating the development of a local removal project, independent of the Project. Any such project will need to be accredited by the ACA.</p>
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## 2.5 Air Quality

2.5.1 The following table sets out the Applicant’s response to matters raised on Air Quality.

**Table 2.4: The Applicant's response to matters raised on air quality**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
A1	Traffic emissions	C	Negative	ES Appendix 5.3.2: Construction Traffic Management Plan (CTMP) [APP-085] and Construction Workforce Travel Plan (CWTP) – An outline CTMP and an outline CWTP have been provided with the application. This is welcomed to mitigate adverse air quality effects associated with both construction traffic and construction work traffic, but additional information is required	The Airports National Policy Statement  Aviation Policy Framework  ESCC LTP4 Policy B5,  WDC WCS14	This matter has not been raised in the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039], <b>Written Representations by East Sussex County Council</b> [REP1-188] or East Sussex County Council <b>Deadline 2 Submission - Updated Principal Areas of Disagreement Summary Statement</b> [REP2-043]. The Applicant requests clarification on the additional information requested by East Sussex County Council.
A2	Traffic emissions	O	Negative	Air Quality Action Plan (AQAP) - A combined operational air quality management plan has not been prepared to draw together the Carbon Action Plan and Surface Access Commitments documents and to specifically focus on local air quality. Air Quality Action Plan (AQAP) - A combined operational air quality management plan has not been prepared to draw together the ES Appendix 5.4.2: Carbon Action Plan [APP-091] and ES Appendix 5.4.1: Surface Access Commitments [APP-090] documents and to specifically focus on local air quality. An AQAP is required to collate all the proposed air quality mitigation measures together, identify any further opportunities to maximise air quality benefits and avoid any unintended consequences.	The Airports National Policy Statement  Aviation Policy Framework  ESCC LTP4 Policy B5,  WDC WCS14	This matter is included at 2.2.4.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039]. The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of <b>Deadline 2 Submission – 10.11 Draft Section 106 Agreement</b> [REP2-004].
A3	Aviation emissions	O	Negative	Aviation emissions are expected to be considered within the GAL AQAP. A wide range of mitigation measures for aviation	Aviation Policy Framework	This matter is included at 2.2.4.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039]. The Draft Outline AQAP which was shared with Local Authorities for



				sources are anticipated to be included e.g. Fixed Electrical Ground Power Supplies (FEGP) for new Aircraft Stands, low emission vehicle standards. Discussions are also proposed on the inclusion of ultrafine particulate monitoring.	ESCC LTP4 Policy B5,  WDC WCS14	comment on 26 <sup>th</sup> March considers aviation mitigation measures and ultrafine particulate monitoring.
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## 2.6 Traffic and Transport

2.6.1 The following table sets out the Applicant's response to matters raised on Traffic and Transport.

**Table 2.5: The Applicant's response to matters raised on traffic and transport**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
T1	Increase in capacity at the airport would lead to an increase in the number of passengers travelling to the airport from East Sussex to the airport by road based vehicles. This would have a negative impact on congestion, air quality, carbon emissions, noise levels, and climate change.	O	Negative	<p>Increasing opportunities to travel to the airport by bus/coach will reduce the number of car journeys and provide travel choices, thereby reducing carbon emissions and helping to meet decarbonisation and climate change targets.</p> <p>Upgrade and extend the current 261 bus route beyond East Grinstead providing a direct service between Uckfield and Gatwick Airport.</p> <p>Re-route the 261 bus service between Wych Cross and Forest Row, via Coleman's Hatch, so that it operates directly between Forest Row and Coleman's Hatch.</p> <p>Extend the operational hours of the 261 service to include early mornings, evenings and weekends. This will require a funding contribution from Gatwick Airport.</p>	<p>NPPF – 9. Promoting sustainable transport Paragraphs 108 to 117</p> <p>East Sussex Local Transport Plan 3</p> <p>ESCC draft Local Transport Plan 4</p> <p>BSIP – Appendix Table 3 - Bus Service Availability: Concerns and Proposals</p> <p>The High Weald AONB</p>	<p>The bus and coach matters are included at Rows 2.20.4.8 to 2.20.4.12 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039].</p> <p>The Applicant can confirm that a Sustainable Transport Fund will be available as set out in Commitment 13 of the <b>Surface Access Commitments (SAC)</b> [APP-090] and secured in the <b>draft DCO S106 Agreement</b> [REP2-004] (paragraph 4 of Schedule 3).</p> <p>The Applicant is committed to the mode shares set out in the SAC, and the Applicant will provide reasonable financial support in relation to the services identified from the strategic modelling work, or others which result in an equivalent level of public transport accessibility. Funding for bus and coach services is set out in the <b>draft Section 106 Agreement</b> [REP2-004] (paragraph 5 of Schedule 3).</p>

			<p>Introduce a Gatwick – Crowborough service. If Crowborough was to be linked directly to Gatwick, we recommend that this would best be delivered by providing a separate new route due to its geographical location and the limitations of the road network. ESCC considers that there would be scope for a Crowborough – Gatwick route to run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick.</p> <p>ESCC request that bus service provision includes a direct link to Heathfield by extending the Uckfield – Gatwick service. This could integrate with the existing ESCC funded bus service between Heathfield and Uckfield. Improvements should be sought and secured through current and future iterations of Gatwick’s Airport Surface Access Strategy (ASAS) which is a document produced as part of the Gatwick Forum Steering Group which includes East Sussex County Council along with other local transport authority representatives, rail and bus operators, and business representatives.</p> <p>ESCC considers GAL should provide a Sustainable Transport Fund and this should be used to help deliver improvements to bus services from East Sussex to the airport. ESCC requests that GAL provide a long term Masterplan which will consider surface access improvements from East Sussex to Gatwick Airport and how the above bus</p>	<p>Management Plan 2019-2024 Objective G3</p> <p>Wealden District Core Strategy Local Plan (2013) Spatial planning objective SPO7, Policies WCS7 and TR3</p>	
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				service mitigation requirements will be funded. This will be important as airport passenger numbers increase, and public transport opportunities and demand increases.		
<b>T2</b>	An increase in car journeys across Ashdown Forest would negatively exacerbate the existing impacts (noise, vehicular emissions (affecting air quality and carbon emissions) on Ashdown Forest – a Special Protected Area.	O	Negative	Whilst the applicant has stated that ‘Agreement has been reached with Natural England on the method used for the HRA assessment and Natural England’s Relevant Representations detail that no further information is required with regard to the HRA assessment’ (ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 and 2 [APP-134 & APP-135]). Regardless of the agreement with Natural England, we wish for an accurate assessment of the current and anticipated impacts needs to be established in order to understand what the impacts would be, regardless of whether or not they are significant. This is because we continue to have concerns over the fundamentals of the traffic data used for us to check that these conclusions are acceptable.	NPPF Paragraphs 187 and 188  Conservation of Habitats and Species Regulations 2017  ES Appendix 9.9.1: Habitats Regulation Assessment Parts 1 and 2 [APP-134 & APP-135].	The extent of the strategic traffic model includes Ashdown Forest, which is an agreed matter at Row 2.20.2.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]</b> . This matter is also included at Row 2.20.4.7 for traffic impact, and Rows 2.2.3.2 and 2.2.3.3 for air quality in the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]</b> . The Applicant will continue to engage with ESCC on this matter and provide further updates to the SoCG in due course.
<b>T3</b>	Whilst much of the county does not serve Gatwick Airport by rail, there are opportunities to do so. These journeys may take longer door to door and require more than one mode of travel;  however, it is important aspect to consider as not all	O	Negative	The applicant should include the East Coastway line between Brighton and Hastings as a key corridor to join the BML for access to GAL.  Any identified pressure(s) on the rail network should be mitigated accordingly, including through improved infrastructure and services (where possible and in liaison with Network Rail and the train operator (Southern – GTR).  There is concern that rail infrastructure and service provision is not fully captured by GAL, and there is a risk that Network Rail’s		A comprehensive assessment of the rail network has been undertaken as set out in Chapter 9 of the <b>Transport Assessment [AS-079]</b> and <b>ES Chapter 12: Traffic and Transport [AS-076]</b> .  The rail network within the public transport model covers much of south and east England. The study area for the rail network is described in paragraphs 12.4.16 to 12.4.20 of <b>ES Chapter 12: Traffic and Transport [AS-076]</b> and focuses on the lines where the Project is likely to have the greatest impact. This approach is in keeping with guidance and regulations set out in paragraph 12.4.11 of <b>ES Chapter 12: Traffic and Transport [AS-076]</b> to ensure that the emphasis is on explaining the significant environmental effects which are likely to be associated with the development and that the ES is proportionate.  Discussions with Network Rail with regard to future

	<p>have access to a private car whereby, they can travel to the airport. Also, use of sustainable travel modes to the airport is preferred and should be encouraged wherever possible.</p> <p>The transport model contains all rail services in the modelled area. However, the assessment focuses on services on the North Downs Line, Arun Valley Line and Brighton Main Line. People travel to Gatwick on the BML from the East Coastway (for work, business, leisure) and understanding the impact this increase in capacity could have on this part of the network is important.</p>			<p>infrastructure and the service pattern GTR can operate on this infrastructure may not be able to accommodate the increase in demand and capacity from passengers that will arise should the NRP become operational. This must be considered alongside wider demands for rail travel.</p> <p>There is no funding associated with rail mitigation in GAL's proposals (like there is for highways). We would wish to see Gatwick's level of commitment to highways also given to rail, especially given their sustainable modal share targets. Gatwick could take a more proactive role in driving mode shift to rail.</p> <p>GAL state that the rail network has sufficient capacity. However, we understand NR will be doing their own modelling to assess this. ESCC support Network Rail's independent modelling work to identify what the impacts of the NRP would have on the rail network, and consideration will subsequently need to be given as to how the impacts could be mitigated.</p>		<p>demand and capacity are ongoing and it should be noted that the Applicant's commitment to rail access has already resulted in considerable investment in railway infrastructure in recent years benefiting airport and non-airport rail users. Further funding would be available through the Sustainable Transport Fund, which the Transport Forum Steering Group is consulted on, including East Sussex County Council along with other local transport authority representatives, rail and bus operators, and business representatives. The Sustainable Transport Fund is secured in the <b>draft Section 106 Agreement</b> [REP2-004] (paragraph 4 of Schedule 3) and would be available to fund initiatives aimed at increasing the use of sustainable transport modes and in support of delivering the commitments in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090].</p> <p>Rail matters are included at Rows 2.20.3.1 and 2.20.3.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [REP1-039].</p>
<b>T4</b>	ESCC are supportive of Network Rail's proposal to undertake	O	Negative	GAL needs to mitigate the impacts of additional rail passenger demand arising from the use of the northern runway through		The assessment for the Project contained in Chapter 9 of the <b>Transport Assessment</b> [AS-079] and <b>ES Chapter 12: Traffic and Transport</b> [AS-076] shows that there would be no significant adverse impact on rail services

	independent modelling work of the impacts of the NRP on the rail network.			investment in the rail network. Network Rail are best placed to advise on the type of mitigation that would be appropriate. It is important that Network Rail's individual assessment of the impact of the proposed NRP on rail demand is undertaken and appropriate mitigation is introduced ahead of the commencement of any operational use of the NRP should it receive consent.		<p>which require mitigation. ESCC support for Network Rail's proposal to undertake independent modelling work is noted.</p> <p>Rail matters are included at Rows 2.20.3.1 and 2.20.3.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [<a href="#">REP1-039</a>].</p>
T5	Increase in pressure on the road network from additional people travelling to the airport for work, business or leisure purposes.	O	Negative	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>This matter is included at Rows 2.20.4.6 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council</b> [<a href="#">REP1-039</a>].</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 <b>ES Chapter 12: Transport Assessment</b> [<a href="#">AS-076</a>]. The assessment identified where traffic flow changes might occur across the modelled area as a result of the Project and the magnitude of impacts was also considered to understand the scale of impact at junctions and links within the model. This process is outlined in Chapters 5 and 12 of the <b>Transport Assessment</b> [<a href="#">AS-079</a>] and in section 6.12 of <b>Annex B - Strategic Transport Modelling Report of the Transport Assessment</b> [<a href="#">APP-260</a>]. The assessment results are presented in Section 12.8 of <b>Annex B of the Transport Assessment</b> [<a href="#">APP-260</a>].</p> <p>No further mitigation has been identified as being necessary in addition to the surface access improvement works which form part of the Project.</p>
T6	Surface access targets not being met.	O	Negative	<p>A combined local transport authority approach whereby growth of the airport is only permitted when surface access commitments / targets have been met will be sought as part of Deadline 2 submission.</p> <p>Instead of GAL committing to achieve annualised mode share targets by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter, GAL should not start operations</p>	Luton Airport Green Controlled Growth Framework	<p>The Applicant's mode share commitments within the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> [<a href="#">APP-090</a>] represent the position the Applicant is committing to achieve, based on modelling of mode choice and transport network operation with the Project in place. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which the Applicant will be working towards, the Applicant has set 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 <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>] and in the <b>Transport Assessment</b> [<a href="#">AS-079</a>] are delivered.</p>

				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.		The SAC sets out the monitoring strategy which is in keeping with the existing process for monitoring ASAS targets and the development of Action Plans in consultation with the Transport Forum Steering Group.
T7	Impacts of additional traffic on local road networks if the modal share targets are not achieved.	O	Negative	<p>Gatwick are proposing ambitious coach targets from Kent to Gatwick. If these are not achieved this could have significant implications on the road network from Kent to West Sussex, impacting on East Sussex roads also.</p> <p>East Sussex County Council support Kent CC's request for Gatwick to undertake a sensitivity test on a particular section of the M25 if the modal targets aren't achieved.</p>		The Applicant's mode share commitments within the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090]</b> represent the position the Applicant is committing to achieve and includes a monitoring strategy. The Applicant has not proposed a specific mode share target for journeys to or from Kent, but the additional coach services to and from the County which are included in the SACs reflect the potential to shift journeys onto public transport from that area and are part of the measures that underpin the mode share commitments we are making. The SAC contains commitments to monitoring progress and, if necessary, taking additional actions to ensure that the mode share commitments are achieved. Sensitivity testing for a situation in which the mode share commitments are not achieved is therefore not necessary.
T8	Increase in uptake in electric vehicles (EV) in the county will require support at the airport to accommodate these vehicles (EV charging spaces / points)	O	Positive	<p>GAL must ensure that EV charging in airport car parks meets anticipated demand, using scenarios for EV adoption from the Government's 2023 Transport Decarbonisation Plan.</p> <p>Issues for GAL to consider:</p> <ul style="list-style-type: none"> <li>- Dynamic tariffs that support charging at off peak times, to lower congestion and to encourage use when the cost of energy grid carbon intensity is lowest</li> <li>- Areas that support public charging exclusively (non-airport vehicles)</li> <li>- Pre-bookable chargers</li> </ul>	<p>DfT Decarbonisation Plan (2023)</p> <p>Emerging East Sussex Electric Charging Strategy</p>	This matter is included at Row 2.20.5.4 of the <b>Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]</b> . The Applicant will keep the provision of EV charging infrastructure in airport car parks under review to ensure continued compliance with relevant Government policy.

				<ul style="list-style-type: none"> <li>- Commercial charging for vehicles associated with the airport should have designated zones.</li> <li>- Automated allocation of a specific charger on arrival (at busy times). This will prevent the reserving of charge points by users for friends colleagues, improve fair use.</li> <li>- Options that limit a charge to a specific percentage e.g. 80% times to support higher throughput.</li> </ul>		
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## 2.7 Health and Wellbeing

2.7.1 The following table sets out the Applicant’s response to matters raised on Health and Wellbeing.

**Table 2.6: The Applicant’s response to matters raised on health and wellbeing**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
H1	<p>Impact of additional flights and an increase in journeys to/from the airport on local communities, affecting physical and mental health and wellbeing, including through impacts of noise (including sleep disturbance) and vibration.</p> <p>A Health Impact Assessment should outline population health impacts for</p>	C & O	Negative	<p>A Health Impact Assessment (HIA) should outline population health impacts for East Sussex. Appropriate mitigation should be proposed and provided to protect population health and any impact on local services and infrastructure.</p> <p>While there is not a statutory duty on the applicant to do so. In the case of this project - given the size, duration of construction, proximity to communities and far reaching disruption as well as ongoing operational increase in activity on completion - we would strongly recommend an HIA be carried out for East Sussex and each affected local authority area. This would ensure that the local health impacts for each area can be clearly identified</p>	<p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) NPPF 8.</p> <p>Promoting healthy and safe communities Para 96 and 97</p>	<p>The Applicant’s position that <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> is a full Health Impact Assessment is detailed further in the Deadline 1 Submission 10.9.4, the <b>Applicant’s Response to Actions from Issue Specific Hearing 3: Socio-economics, Action Point 6 [REP1-064]</b></p> <p><b>ES Chapter 18: Health and Wellbeing [APP-043]</b> signposts to and sets out appropriate mitigation to protect population health and any impact on local services and infrastructure. See for example Section 18.7 and Table 18.7.1 of <b>ES Chapter 18: Health and Wellbeing [APP-043]</b>.</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: “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”.</p>

	East Sussex and appropriate mitigation proposed and provided to protect population health and any impact on local services and infrastructure.			<p>and communicated. Without independent HIA's it is not possible to understand the health impacts on each of the populations. The health impacts will vary greatly across the authority areas, and so it is important that this is made clear and presented transparently rather than integrated within an existing environmental statement chapter.</p> <p>Note: GAL have stated that their Environmental Statement Chapter 18: Health and Wellbeing (Doc Ref. 5.1) sets out the study areas in Section 18.4, paragraph 18.4.8 (pdf page 25/214). East Sussex is part of the 'Six Authorities Area'. These are local level effects that are summarised at paragraph 18.11.9 (pdf page 178/214), with measures to reduce adverse impacts and increase beneficial effects discussed in the respective sections of section 18.8 that deal with each of these determinants of health.</p>	<p>Noise policies Airports National Policy Statement</p> <p>Health Para 4.70 – 4.73</p> <p>Noise Para 5.44 5.52, 5.56, 5.57, 5.68</p> <p>National Policy Statement for National Networks</p> <p>Health Paras 4.79 – 4.82</p> <p>See also Air quality, Noise</p>	<p>These Government organisations have a particular role and technical expertise in relation to health inequalities and they are satisfied with the current assessment.</p>
H2	Impact of noise and vibration on local communities – vulnerable groups	O	Negative	<p>The noise and vibration impacts on health and well-being of local communities need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups within this, that may be more affected by the impacts of noise (and vibrations).</p>	<p>NPPF 8. Promoting healthy and safe communities Para 96 and 97</p> <p>Noise policies Airports National Policy Statement -, Health Para 4.70 – 4.73</p> <p>Noise Para 5.44 5.52, 5.56, 5.57, 5.68</p>	<p><b>ES Chapter 14: Noise and Vibration [APP-039]</b> sets out the primary analysis of noise on local communities and discussion of appropriate mitigation.</p> <p><b>ES Chapter 18: Health and Wellbeing [APP-043]</b> 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 <b>ES Appendix 14.9.10: Noise Insulation Scheme [APP-180]</b>. for local vulnerable groups. These are set out in ES Appendix 14.9.10, paragraph 4.1.15.</p> <p><b>ES Chapter 18: Health and Wellbeing [APP-043]</b> concludes, paragraph 18.8.223 “Overall, the minor adverse noise scores reflect that, whilst any increase in aviation (both air noise and ground noise) and surface access noise may be considered detrimental to some degree for public health, ie not negligible, the change due to the Project is <u>not significant for population health</u> in EIA Regulation terms.”</p>



					National Policy Statement for National Networks Health Paras 4.79 – 4.82  See also Air quality, Noise	It is noted that the UKHSA conclude <a href="#">[RR-4687]</a> : <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> <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> includes an assessment of vibration from construction work (paragraphs 14.9.64 and 14.9.65) and confirmation of the very limited potential for operational vibration impacts (Table 14.3.1).
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## 2.8 Dark Skies

2.8.1 The following table sets out the Applicant’s response to matters raised on Dark Skies.

**Table 2.7: The Applicant’s response to matters raised on dark skies**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
D1	Concern that the increase in night flights will impact on dark skies and be in conflict with policy outlined in local protected landscape strategies e.g. High Weald, South Downs National Park.			Whilst Gatwick Airport’s assessment deems there to be minor adverse effects (see excerpt below) any effect should be appropriately mitigated as this could have an impact on the protected landscapes below. The increase in overflights at up to 7,000 feet, compared to the future baseline scenario in 2032, is estimated to be up to approximately 20% during daytime and up to 10% during night time, which is considered to result in minor adverse effects (see Table 8.8.1)	NPPF 15. Conserving and enhancing the natural environment Para 191 c)  South Downs Local Plan 2014 to 2033 includes Objective 1: ‘To conserve and enhance the landscapes of the National Park’ and Strategic Policy SD8: Dark Night Skies.  The High Weald AONB	This issue has been previously addressed at Row 2.14.3.1 of the Statement of Common Ground between <b>Gatwick Airport Limited and East Sussex County Council</b> <a href="#">[REP1-039]</a> .

					Management Plan 2019-2024	
					Objective OQ4	

### 3 Joint Surrey Councils

#### 3.1 Overview

3.1.1 This section sets out the Applicant’s response to the points raised within the Local Impact Report [\[REP1-097\]](#) and appendices submitted by the Joint Surrey Councils which comprise of Surrey County Council, Mole Valley District Council, Reigate and Banstead Borough Council and Tandridge District Council. The Applicant has retained the headings and structure of the Local Impact Report below.

#### 3.2 Planning Policy

3.2.1 A series of **Local Policy Compliance Tables** (Doc Ref. 7.1) have been prepared in response to local policies of relevance to the Project and referenced in the **Joint Surrey Councils Local Impact Report** [\[REP1-097\]](#) and are submitted at Deadline 3. **Annex B** of the Local Policy Compliance Tables relates to Mole Valley District Council’s local planning policies, **Annex D** relates to Tandridge District Council and **Annex F** is applicable to Reigate and Banstead Borough Council.

#### 3.3 Principle of Development

3.3.1 Section 4 of the LIR sets out a number of matters relating for instance to need, capacity and policy under the heading ‘Principle of development’ and also draws on Appendix B provided by York Aviation. These matters are replicated in the LIR for example from the Joint Sussex Authorities. The Applicant has responded to these matters in a separate document which is provided as **Appendix A** to this Response.

#### 3.4 Sections 104 and 105

3.4.1 Following its explanation of the approach it has taken to sections 104 and 105 of the 2008 Act in its **Response to Actions - ISH 1: The Case for the Proposed Development** [\[REP1-062\]](#), the Applicant continues to discuss the operations of sections 104 and 105 with the Joint Local Authorities. As matters stand, it is not persuaded that section 104 should be applied to the entire application in the manner suggested in the LIR [\[REP1-068\]](#), paragraphs 6.1-6.10]. Section 104 was intended to be engaged in cases where an NPS was in effect in relation to the development comprising the main substance of the application, not to cases where the main purpose of the project is to deliver development in respect of which no NNNPS is in effect. The Applicant is not persuaded by the suggestion that the application should be treated as not in accordance with the NNNPS for the purposes of section 104(3) solely on the grounds that the application includes development in respect of which the NNNPS is not in effect. This invites a conclusion on whether an application is in accordance with an NPS with no substantive application of the policies within that NPS. It is also unclear from the analysis in the LIR how section 104 is intended to operate more generally when considering the wider merits of the application. These issues will form part of the discussions between the parties, and the Applicant anticipates their respective positions being addressed in the Statement of Common Ground or other position paper by Deadline 5. at the latest.

#### 3.5 Historic Environment

3.5.1 The following table sets out the Applicant’s response to matters raised on Historic Environment.

**Table 3.1: The Applicant's response to matters raised on historic environment**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
HE1	SCC not identified as relevant discharging authority within dDCO	C	Negative	Revisions required to Requirement 14 Archaeological remains – i.e. replace relevant	Aligns with roles and	The Applicant amended Requirement 14 in the <b>draft DCO</b> (Doc Ref. 2.1 v6) submitted at Deadline 3 to clarify that Surrey County Council is the relevant authority as regards archaeological remains in Surrey.

	– inefficient discharging process			planning authority with County Archaeologist at Surrey County Council	responsibilities within Surrey	
<b>HE2</b>	Sampling strategies for examination of archaeological features not yet agreed	C	Potentially negative if not agreed	Approved sampling strategy to be detailed in revised Written Scheme of Investigation.	SCC minimum standards for examination of archaeological features	This request was addressed in the latest version of <b>ES Appendix 7.8.1: Written Scheme of Investigation for post-consent Archaeological Investigations - Surrey [REP2-017]</b> submitted at Deadline 2.
<b>HE3</b>	Lack of consideration of suitability of noise insulation policy for listed buildings	C&O	Negative	Specific provisions for listed buildings within the policy given the potential for the need for listed building consent	As highlighted within PINs scoping opinion	The Applicant has considered the options for obtaining Listed Building Consent for noise insulation and prepared an <b>Update Note [REP2-031]</b> on the implementation of the <b>ES Appendix 14.9.10: Noise Insulation Scheme [APP-180]</b> which was submitted at Deadline 2. This explains the process by which applications for Listed Building Consents will be submitted where necessary.
<b>HE4</b>	Harm to setting of Listed St Bartholomew's Church	C&O	Negative	The re-landscaping and replanting of Church Meadows should consider how these changes could help enhance the setting of Listed St Bartholomew's Church	RBBC DMP NHE9 para 8	Paragraph 7.3.18 of <b>ES Chapter 7: Historic Environment [APP-032]</b> considers the impact of the proposed environmental mitigation at land north of Longbridge Roundabout on the Church Road (Horley) Conservation Area, which includes Church Meadows. The assessment concludes that the impact of the proposed planting scheme along with the proposed provision of a new footbridge over the River Mole and the proposed provision of information boards is likely to result in an effect of minor beneficial significance. The new footbridge would be located in the western part of the Conservation Area, at some distance from the Grade I listed church of St Bartholomew. It is considered that overall there would be no long-term impact on the church as a result of any change within its setting. It is possible that the enhancements to the Conservation Area set out above could result in some level of enhancement of the setting of the church, but this would be very limited.

### 3.6 Landscape, Townscape and Visual Resources

3.6.1 The following table sets out the Applicant's response to matters raised on Landscape, Townscape and Visual Resources.

**Table 3.2: The Applicant's response to matters raised on landscape, townscape and visual resources**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
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<b>LV1</b>	Longbridge Roundabout works urbanising rural location	C	Negative	Details of the access route to the works compound need to be identified along with measures to minimise harm to visual amenities	Airports- NPS para.218	<p><b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b> sets out general methodologies and mitigation measures for construction compounds.</p> <p>In relation to the Longbridge Roundabout works, paragraph 4.9.17 of the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b> describes the Longbridge Roundabout contractor compound which is partially located within the Church Road (Horley) Conservation Area. The tallest elements within the compound are expected to be two storey containers at a maximum of six metres above ground level.</p> <p>Paragraph 5.7.3 refers to a Construction Traffic Management Plan (CTMP) of which an outline has been submitted at <b>Annex 3 - Outline Construction Traffic Management Plan [APP-085]</b>. The CTMP will describe the location and anticipated uses of the construction compound and provide a summary of proposed access to this. The plan will set out measures to reduce the impact on local communities and is secured pursuant to Requirement 12 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p>Measures to minimise visual harm include the monitoring and mitigating obtrusive light that would adversely impact on the character of the existing nocturnal lighting scene from the construction compound and works on Longbridge Roundabout and the Brighton Road bridge construction. This will include avoid light spill and light intensity exceeding ILP GN01 thresholds from the construction compound and constructions works of the Longbridge Roundabout and Brighton Road Bridge onto land east of the River Mole. The <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b> (CoCP) states at Section 5.3 that green infrastructure assets will be retained wherever practicable, including urban green spaces such</p>
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					<p>as Church Meadows and in particular visually significant vegetation is retained where practicable to minimise adverse effects on visual receptors.</p> <p>Figures 1.2.4 to 1.2.15 of the <b>Outline Landscape and Ecology Management Plan (oLEMP)</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] show Surface Access Landscape Proposals.. Figure 1.2.15 Surface Access Landscape Proposals Sheet 12 of 12 and Figure 1.2.3 Longbridge Roundabout Sketch Landscape Concept show the principles of landscape design at Longbridge Roundabout and Church Meadows. Landscape design objectives for the Surface Access zone are included at Section 3.7 and Landscape Proposals for the zone are included at Section 4.7 of the oLEMP. Trees and vegetation to be removed north of Longbridge Roundabout will be replaced with native tree and scrub species. Further, woodland habitat will be planted in the area of replacement public open space to provide an overall increase in vegetation, habitats and open space in this location.</p> <p>The value of the road corridors landscape/townscape context and visual amenity has been recognised during the design development. Short term impacts on landscape character and visual amenity as a result of vegetation loss generally and within existing green space (Church Meadows/Riverside Garden Park) are assessed during construction and when operational within the LTVIA at sections 8.9. and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resource</b> [<a href="#">APP-033</a>]. Effects on visual receptors including users of public open space at Church Meadows would be significant during construction and when the surface access works are complete before the landscape mitigation proposals have matured. Effects on private views from residential receptors at a limited numbers of properties on the edge of Horley would also be</p>
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						<p>temporarily significant during this period. In the long term, when mitigation and enhancement proposals have matured, all effects on visual amenity would reduce to a level that is no longer significant. The chapter thoroughly describes planting proposals as they mature to mitigate adverse effects on landscape character and visual amenity.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> sets out general methodologies and mitigation measures and Annex 6 to the CoCP forms an Outline Arboricultural Method Statement which includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences. These drawings will be revisited and refined during the detailed design process and submitted as part of the detailed Arboricultural Method Statement. <b>Code of Construction Practice – Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) is being submitted at Deadline 3 to include retention and removal of general vegetation within the Project, in addition to trees and woody vegetation.</p> <p>A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences on that part as set out within Requirement 8(1) of the <b>draft DCO</b> (Doc Ref. 2.1). These LEMPs must be substantially in accordance with the oLEMP.</p>
<b>LV2</b>	Woodland Belt Longbridge Roundabout	C/O	Negative	<p>Remaining tree and vegetation buffer will require additional replanting following the works but will take many years to recover.</p> <p>Detail on replanting will need to be agreed with LPA/ Highways Authority</p>	<p>Airports- NPS para.218</p> <p>RBBC DMP Policy NHE1</p>	<p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[REP2-021]</a>, <a href="#">[REP2-023]</a>, <a href="#">[REP2-025]</a>, <a href="#">[REP2-027]</a> sets the overarching landscape vision for the Project. Figure 1.2.15 Surface Access Landscape Proposals Sheet 12 of 12 and Figure 1.2.3 Longbridge Roundabout Sketch Landscape Concept show the principles of landscape design at Longbridge Roundabout and Church Meadows. Landscape design objectives for</p>

					<p>MVDC LP (2000) Policy ENV4 and ENV23.</p> <p>MVDC Future LP Policy EN8</p>	<p>the Surface Access zone are included at Section 3.7 and Landscape Proposals for the zone are included at Section 4.7 of the <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] Annex 4 shows Surface Access Tree Survey and Tree Protection Plans.</p> <p>Trees and vegetation to be removed north of Longbridge Roundabout will be replaced with native tree and scrub species. Further woodland habitat will be planted in the area of replacement public open space to provide an overall increase in vegetation, habitats and open space in this location. A typical mix of native tree and shrub species planted as predominantly bare root transplants would be sufficiently mature at 10 years to achieve screening and softening of development and is included in ES Appendix 8.8.1 OLEMP Annex 3 Typical Planting Schedules. Tree species in particular would continue to grow and mature to further mitigate effects on landscape and visual resources and contribute to enhancement of green infrastructure generally and integration with the surrounding landscape and townscape.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> [<a href="#">REP1-021</a>] sets out general methodologies and mitigation measures and Annex 6 to the CoCP forms an Outline Arboricultural Method Statement which includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences. These drawings will be revisited and refined during the detailed design process and submitted as part of the detailed Arboricultural Method Statement. <b>Code of Construction Practice – Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) is being submitted at Deadline 3 to include retention and removal of general vegetation</p>
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						<p>within the Project, in addition to trees and woody vegetation.</p> <p>A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences as set out within Requirement 8(1) of the draft DCO. These LEMPs must be substantially in accordance with outline LEMP.</p>
<b>LV3</b>	Significant reduction of vegetation buffer along A23 London Road/ M23 Spur including Riverside Gardens	C/O	Negative	New tree planting will be required along the A23 London Road/ M23 spur including Riverside Garden Park to replace buffer that will be removed for road widening and bridge construction. This will need to be agreed with LPA and Highways Authority	Airports- NPS para.218  RBBC DMP Policy NHE1	<p><b>ES Appendix 5.3.2: Code of Construction Practice</b> [<a href="#">REP1-021</a>] sets out general methodologies and mitigation measures and Annex 6 to the CoCP forms an Outline Arboricultural Method Statement which includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences. These drawings will be revisited and refined during the detailed design process and submitted for approval as part of the detailed Arboricultural Method Statement. <b>Code of Construction Practice – Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) is submitted at Deadline 3 to include retention and removal of general vegetation within the Project, in addition to trees and woody vegetation.</p> <p>The majority of the vegetation that would be removed as part of the surface access improvements of the A23 would be scrub and small to medium sized trees. Reinstatement of scrub and tree planting (illustrative designs for landscape mitigation are shown in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a> ]), where possible and in accordance with guidelines in Highways England, DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13.</p>

						<p>The details of landscape planting will be included in a detailed LEMP and will be approved in consultation with the relevant planning authority or highway authority pursuant to Requirement 8 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p>
<b>LV4</b>	Harm to seclusion of Church Meadows as a result of Longbridge Roundabout modifications and River Mole bridge works	C/O	Negative	New tree planting and restoration of Church Meadows open space treat as an obligation	<p>Airports- NPS para.218</p> <p>RBBC DMP Policy NHE1 &amp; OSR1</p> <p>MVDC LP (2000)</p> <p>Policy ENV4 and ENV23.</p> <p>MVDC Future LP Policy EN8</p>	<p>Trees and vegetation to be removed on Brighton Road and the River Mole adjacent to public open space at Church Meadows, to accommodate the surface access improvements will have a short term impact on townscape character and visual amenity. Vegetation will be replaced with native tree and shrub species to reinstate the features and character of this space. Further woodland habitat will be planted in a new area of replacement public open space west of the River Mole and linked to Church Meadows by a new footbridge to provide an overall increase in vegetation, habitats and open space in this location.</p> <p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] sets the overarching vision for the Project. Figures 1.2.4 to 1.2.15 show Surface Access Landscape Proposals. Following detailed design, a LEMP for individual parts of the Project will be submitted to and approved by the relevant local authority before work on that part commences as set out within Requirement 8(1) of the draft DCO. These LEMPs will be substantially in accordance with the outline LEMP.</p>
<b>LV5</b>	Sussex Border Path 362a Railway Overbridge	C	Negative	Agreement with local authorities on screening during construction	<p>Airports- NPS para.218</p> <p>RBBC DMP Policy NHE1</p>	<p>At this stage of the design of the Project a specific design for any particular construction compound has not been assessed, but rather a reasonable worst case has been based on the activities which will be undertaken within the compound. <b>ES Appendix 5.3.2 Code of Construction Practice (CoCP)</b> [<a href="#">REP1-021</a>] and <b>ES Appendix 5.3.1: Buildability Report</b> [<a href="#">APP-079</a>, <a href="#">APP-080</a>, <a href="#">APP-081</a>] set out the general nature of compounds and their key elements although do not contain detailed layouts of infrastructure at</p>

						<p>this stage. The CoCP describes how the Applicant will manage and minimise disturbance and other environmental impacts from construction activities required to deliver the Project whilst meeting the requirements of relevant legislation, codes of practice and standards.</p> <p>The CoCP at Section 4: General Requirements and Section 5: Management of Environmental Effects set out typical measures to minimize impacts on landscape and visual resources. These would include the appropriate positioning of infrastructure within the compound, appropriate types, locations and operation of lighting and the type/height of boundary treatments including security fences and screens. The construction activities must be carried out in accordance with the CoCP under Requirement 7 of the <b>draft DCO</b> (Doc Ref. 2.1).</p> <p><b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> <a href="#">[REP2-009]</a> includes management measures during construction. Where necessary suitable fencing will be erected along PRow corridors. The type and size of fencing will be specified within detailed PRow implementation plans which must be substantially in accordance with the PRow Management Strategy and must be approved by the relevant highway authority under Requirement 22 of the <b>Draft DCO</b> (Doc Ref. 2.1).</p>
<b>LV6</b>	Sussex Border Path 368 M23 Spur	C	Negative	Agreement with local authorities on screening during construction	Airports- NPS para.218  RBBC DMP Policy NHE1	See LV5 above
<b>LV7</b>	National Cycle Route 21	C	Negative	Agreement with local authorities on screening during construction	Airports- NPS para.218  RBBC DMP Policy NHE1	See LV5 above

<b>LV8</b>	No's 74, 76, 78, & 80 Longbridge Road	C/O	Negative	Requirement for 2m fencing between buildings and A23 and agreed replanting with SCC and RBBC	Airports- NPS para.218  RBBC DMP Policy NHE1	See LV5 Above  In addition to the replanting/vegetation retention, as set out in section 5.4.20 of the <b>ES Appendix 5.3.1: Code of Construction Practice</b> <a href="#">[APP-082]</a> , a 2.4m high timber closed-board fence will be installed along the construction boundary of the A23 between the works areas and the habitats within Riverside Garden Park to help ensure that a dark corridor is maintained for the purposes of bat commuting/foraging. As such, there is already a commitment to the inclusion of the fence requested.
<b>LV9</b>	Meadowcroft House	C	Negative	Relocation of South Terminal Roundabout works compound T1 to alternative location	Airports- NPS para.218  RBBC DMP Policy NHE1	The selection of this site to support the creation of the grade separation scheme at South Terminal Roundabout was considered at an early stage of the design process and reported in the PEIR which formed the basis of the September 2021 statutory consultation. This site continues to be the only viable solution which is both close to the construction site (limiting additional movements on the local road network) whilst also avoiding unacceptable impacts on either the motorway network or the airport's South Terminal road system.
<b>LV10</b>	Insufficient consideration of revised SHNL boundaries will result on more extensive impacts to tranquillity over wider areas.	O	Negative	Review tranquillity assessments in an up to date context and ensure suitable mitigation is implemented, this could be achieved through other noise mitigation mechanisms. The assessment should be extended to include additional representative locations within the proposed SHNL extension areas.	Airports NPS – para(s) 5.213, 5.216, 5.218 and 5.222  RBBC NHE1  MVDC Core Strategy Policy CS13 and EN23  MVDC Future LP Policy EN8	Natural England began work on the Surrey Hills Boundary Review following a Written Ministerial Statement on 24th June 2021. As part of the consultation process the Surrey Hills National Landscape team has mapped areas where it is considered there is strong evidence for further extensions to the identified candidate areas. As yet there has been no change to the boundary of the National Landscape.  <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> includes an assessment of effects on landscape character and special qualities of the Surrey Hills AONB, any views from or to the designated landscape and effects on the perception of tranquillity as a result of overflying aircraft at sections 8.9. and 8.11. See also <b>ES Chapter 8: Landscape, Townscape and</b>

						<p><b>Visual Resources Figures: Figures 8.4.2, 8.4.3, 8.6.3 to 8.6.7 and 8.9.1 to 8.9.128</b> [REP2-006, REP2-007, REP2-008]). Any assessment of predicted effects on the landscape, views or perception of tranquillity on the basis of land that may or may not be included in the National Landscape was not included in the ES.</p> <p>If the identified new areas are designated, they would significantly increase the area of the Surrey Hills AONB. The ZTV within <b>ES Chapter 8: Landscape, Townscape and Visual Resource Figures – Part 1: [REP2-006]</b> Figure 8.4.3 indicates that small, scattered areas on the tops of ridges and hills on the south side of the existing AONB would potentially form vantage points for distant views of Gatwick and the NRP. Any change in view is likely to be negligible or minor adverse, reflecting the assessment of views from Leith Hill at Viewpoint 32 within the Surrey Hills AONB (see <b>ES Chapter 8 Appendix 8.9.1: Summary of Effects at Representative Viewpoints [APP-117]</b>). Any boundary change would result in a larger area of nationally designated landscape that is overflowed by aircraft. <b>ES Chapter 8 Figures 8.6.3 to 8.6.7 [REP2-006], [REP2-007] and [REP2-008]</b> illustrate the baseline and proposed increase in the numbers of overflights that have informed the assessment of the perception of tranquillity within a wider study area, that would include any boundary change.</p>
LV11	Insufficient consideration of tranquillity impact on SHNL	O	Negative	The Applicant to provide further justification for why an increase in overflight of up to 20% is not considered significant, particularly for nationally designated landscapes which are high/very high sensitivity locations	NPS-NN and ANPS	<p><b>ES Chapter 8 Landscape, Townscape and Visual Resources [APP-033]</b> includes an assessment of effects on landscape character and special qualities of the Surrey Hills AONB, any views from or to the designated landscape and effects on the perception of tranquillity as a result of overflying aircraft at sections 8.9. and 8.11.</p> <p>The methodology is based on CAA guidance (CAP1616 Appendix B, para B30 and B56). The frequency of aircraft movements and general orientation of flights are</p>

					<p>illustrated in Figures 8.6.3 to 8.6.7 of the <b>ES Landscape, Townscape and Visual Resources Figures [REP2-008]</b> together with nationally designated landscapes and 10 popular and well known locations within them. The assessment includes effects on the perception of tranquillity within the Surrey Hills 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).</p> <p>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 Surrey Hills National Landscape 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.</p> <p>The largest increase in overflights is anticipated to be in areas that currently experience the greatest number of overflights, where relative tranquillity is therefore already slightly lower in the baseline scenario. An increase of up to 20% in the number of aircraft following the same flight paths may be discernible to some residents or observers and it may be barely perceptible as an increase to others. Some people within the National Landscape may be unable to perceive the increase in the number of aircraft and would therefore experience no discernible effect to</p>
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						the level of tranquillity. The magnitude of change would be negligible leading to minor adverse effects on the perception of tranquillity during the day and at night, which is not significant.
<b>LV12</b>	Visual and tranquillity impacts of 'end-around' taxiway and Juliet Holding Spur	O	Negative	Further commentary and detailed assessments must be provided to demonstrate the design and performance of the proposed barriers throughout all the years of the development.	Airports NPS para(s) 5.213, 5.216, 5.217 and 5.218  MVDC LP (2000)  Policy ENV4 and ENV23.  MVDC Future LP Policy EN8	Sections 8.9 and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033], include a thorough assessment of landscape and visual effects as a result of the construction and operation of the end around taxiways and Juliet Spur and the noise mitigation feature incorporating earth bund, retaining wall and tree planting. The existing noise mitigation bund would be removed and replaced with a new feature constructed adjacent to Lowfield Heath Road, extending approximately 450 m into the Project site. The replacement feature would be located adjacent to the neighbouring Upper Mole Farmlands landscape character area and provide an equivalent degree of softening and screening of Airport activities. Aircraft would continue to be visible and audible manoeuvring on the ground and taking off and landing overhead. The LTVIA concludes that there would be a slight intensification of the predominantly urban characteristics of the Airport and its ability to influence the Crawley Upper Mole Farmlands character area, visual receptors and the level of tranquillity they experience, particularly when in close proximity to the airport.
<b>LV13</b>	Inadequate approach to visualisations	C and O	Negative	We consider it proportionate for the Applicant to prepare fully rendered photomontages for key near and middle distance viewpoints, in order to realistically show the likely changes in these views. Separate photomontages should be prepared for each key viewpoint for the construction, operation (Year 0) and operation (Year 15) timeframes, to realistically show the visual effects of vegetation removals, construction compounds and associated heavy/tall plant, new buildings and	Chapter 8 of the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (2013) (GLVIA3) and the Landscape Institute Technical Guidance Note 06/19 – Visual	Photomontage/photo wirelines based on maximum parameter models defined within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033]. Figures 8.9.1 to 8.9.128 [REP2-007, REP2-008] are to Type 3 of the Landscape Institute, Visual Representation of Development Proposals: Technical Guidance Note 06/19. The guidance recommends that visualisation Types 2, 3 or 4 are appropriate for 'Evidence submitted to Public Inquiry, most planning applications accompanied by LVIA (as part of formal EIA), some non EIA (LVA) development which is contrary to policy or

				infrastructure and the maturation of replacement planting	Representation of Development Proposals	<p><i>likely to be contentious. Visualisations in public domain</i>’.</p> <p>The methodology for the preparation of visualisations is in <b>ES Appendix 8.4.1: Landscape, Townscape and Visual Impact Assessment Methodology</b> [APP-109].</p> <p>Maximum parameter models have been assessed for elements within the Project (where necessary) and form an appropriate level of detail required for the application (see ES Chapter 8 Table 8.7.1). A greater level of detail for landscape mitigation proposals is provided for the surface access improvements, in accordance with DMRB in <b>ES Appendix 8.8.1, Outline Landscape, Ecology, Management Plan</b> [REP2-021 ,REP2-023, REP2-025, REP2-027] . A <b>Design and Access Statement</b> [REP2-032, REP2-033, REP2-034, REP2-035, REP2-036] has been prepared to show illustrative visualisations of the development.</p>
LV14	Lack of detail on vegetation removal within the airport boundary	C	Negative	oLEMP to be updated to include better consideration of vegetation removal and associated mitigation within the airport boundary		<p><b>ES Appendix 8.8.1 Outline Landscape, Ecology, Management Plan</b> [REP2-021 ,REP2-023, REP2-025, REP2-027] sets the overarching vision for the Project. Annex 4 shows Surface Access Tree Survey and Tree Protection Plans.</p> <p><b>ES Appendix 5.3.2 Code of Construction Practice</b> [REP1-021] sets out general methodologies and mitigation measures and Annex 6 to the CoCP forms <b>ES Appendix 5.3.1: Code of Construction Practice Annex 6 - Outline Arboricultural Method Statement</b> [REP1-023, REP1-024, REP1-025] . An Outline Arboricultural and Vegetation Method Statement is being prepared to include retention and removal of general vegetation within the Project, in addition to trees and woody vegetation.</p> <p>A LEMP for individual parts of the Project will be submitted to and approved by the LPA before work commences as set out within Requirement 8(1) of the</p>



						draft DCO. These LEMPs will be substantially in accordance with the outline LEMP.
<b>LV15</b>	Insufficient certainty in relation to the delivery of replacement open space	C and O	Negative	<p>Ordinarily, the Council would expect the order to provide for the acquisition of existing open space land only once a scheme has for the provision of the open space land has been implemented to the local planning authority's satisfaction.</p> <p>Revisions required to article 40</p>	DCO Model Provisions	<p>Section 131 of the Planning Act 2008 indicates that replacement land need not be provided before special category land can be acquired pursuant to a development consent order. Section 131 allows for an order to authorise the compulsory acquisition of such land without the need for special parliamentary procedure provided that the Secretary of State is satisfied that, <i>inter alia</i>, "replacement land has been <b>or will be</b> given in exchange for the order land".</p> <p>The approach adopted in article 40 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) is precedent in several recently made DCOs. Article 45 of the Chelmsford to A120 Widening Development Consent Order 2024, article 38 of the A38 Derby Junctions Development Consent Order 2023 and article 34 of the A303 (Amesbury to Berwick Down) Development Consent Order 2023 all allow the acquisition of special category land once the Secretary of State (in consultation with the relevant planning authority) has certified that a scheme for the provision of the replacement land as open space and a timetable for the implementation of the scheme has been received from the undertaker. In each of these precedents the scheme need not have been laid out prior to acquisition of the special category land.</p> <p>Article 40 of the draft DCO similarly provides that special category land is not to vest in the undertaker until an open space delivery plan has been submitted to and approved by Crawley Borough Council (in consultation with Reigate &amp; Banstead Borough Council and Mole Valley District Council where applicable). This delivery plan must set out a timetable for the submission of a Landscape and Ecology Management Plan for the replacement land pursuant to Requirement 8 in Schedule</p>

						2 to the draft DCO and the laying out of the replacement land as open space. Through GAL's submission of and adherence to the delivery plan, the relevant local authorities will be involved in the delivery of the replacement open space.
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### 3.7 Ecology and Nature Conservation

3.7.1 The following table sets out the Applicant's response to matters raised on Ecology and Nature Conservation.

**Table 3.3: The Applicant's response to matters raised on ecology and nature conservation**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
E1	Lack of a landscape scale approach to assessing and addressing ecological impacts	C and O	Negative	Enhancements to green corridors and improved habitat connectivity should extend beyond scheme boundary, along key corridors such as River Mole and Gatwick Stream	NPPF, paras 180,181,185  Emerging LNRS  Mole Valley Local Plan ENV8, 13 and 14  Reigate and Banstead Policy CS2	<p>As set out in Section 9.4.6 et seq. in <b>ES Chapter 9 Ecology and Nature Conservation</b> [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 <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys</b> [APP-131 and APP-132]. This ensured that there could be consideration of potential effects at a landscape scale.</p> <p>With respect to the provision of habitats outwith the Airport, it should be noted that both Museum Field and the Brook Farm area were off-airport but have been included within the Order Limits as the scheme has evolved. As such, the Project is already delivering habitat creation measures that further the goals of the Ecology Strategy for the airport, as set out in Section 6 of <b>ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan</b> [REP2-021 to REP2-028].</p>

<b>E2</b>	Loss of mature broadleaved woodland (and other habitats)	C	Negative	It is not clear from the application document how much woodland is being lost and how much is being enhanced/replanted. Additional compensation required for trees/ woodland loss (especially given lag time for newly planted woodland to mature and reach target condition).	Natural Environment and Rural Communities (NERC) Act 2006  NPPF, paras 180,181,185, 186  Mole Valley Local Plan ENV8, 13 and 14  Reigate and Banstead Policy NHE3 Tandridge CSP17	<p><b>ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan</b> <a href="#">[REP2-021 to REP2-028]</a> sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the outline LEMP.</p> <p>The completion of tree surveys and the preparation of tree protection plans demonstrates that tree protection measures and root protection areas can be accommodated within tree removal areas to minimise harm to trees during construction periods within the application site. As part of the DCO Application, <b>ES Chapter 9 Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> assesses a reasonable worst case scenario for tree and vegetation removal based on the land required for construction activities.</p> <p>The Applicant undertook a tree survey of land within the vicinity of the surface access improvements for the ES which is included in <b>ES Appendix 8.10.1 Tree Survey Report and Arboricultural Impact Assessment</b> <a href="#">[REP1-026, REP1-027, REP1-028, REP1-029, REP1-030]</a> to enable the likely area of greatest vegetation loss as a result of the Project to be identified. Annex 4 of the <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[REP2-021 - REP2-028]</a> includes a set of nine Surface Access Tree Survey and Tree Removal and Protection Plans. The Applicant has undertaken further surveys included in <b>Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> <a href="#">[REP1-026, REP1-027, REP1-028, REP1-</a></p>
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						<p><a href="#">029</a>, REP1-030] The document provides outline plans for tree retention and trees likely to be removed based on preliminary designs. The report identifies root protection zones which inform protective measures during development.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> Annex 6 includes an Outline Arboricultural Method Statement which identifies measures to protect root protection zones. The measures along with Detailed Tree Removal and Protection Plans, specifying the trees to be retained, will be contained as part of the Detailed Arboricultural Method Statements for approval by the relevant planning authority prior to the relevant construction works commencing, as set out in the <b>ES Appendix 5.3.2: Code of Construction Practice Annex 6 - Outline Arboricultural Method Statement</b> <a href="#">[REP1-023]</a>, <a href="#">REP1-024</a>, <a href="#">REP1-025</a>].</p> <p>In addition, Annex 3 of <b>ES Appendix 9.9.3: Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a> provides tables of habitats lost/gained as part of the Project. These figures are taken from those automatically generated within the BNG Metric 4.0 based on the habitat areas to be lost and gained inputted within the spreadsheet.</p> <p>For the avoidance of doubt, a consolidated detail of all vegetation to be lost as a result of the construction of the Project will be provided in a technical note at Deadline 4.</p>
<b>E3</b>	Unknown impact on roosting bats	C	Negative	No bat roost surveys of 'high' or 'medium' trees proposed for removal have been carried out to inform the baseline and impact assessment. Surveys are required to inform impacts and mitigation / compensation for roosting bats.	<p>Surveys are required prior to determination</p> <p>- Policy in relation to protected species- ODPM circular 06/2005 The Conservation</p>	<p>Such surveys are on-going and will be reported when complete (anticipate Deadline 8). Surveys comprise the climbing of trees to determine the presence/absence of roosts on up to three occasions (depending on the roost potential of the tree) during the bat active season with at least two climbs between May and July. Any tree that cannot be climbed will be subject to appropriate emergence surveys.</p>

					of Habitats and Species (amendment) Regulations, 2019, Wildlife and Countryside Act 1981 NPPF, paras 185 and 186	
<b>E4</b>	Lack of information on Great Crested Newt and reptile mitigation	C	Negative	The standard approach would be for an outline mitigation strategy for both reptiles and GCN to be included as part of the application. It is unclear whether residual impacts have been appropriately assessed without having an outline mitigation strategy in place.	The Conservation of Habitats and Species (amendment) Regulations, 2019, Wildlife and Countryside Act 1981 NPPF	Impacts to both reptiles and GCN were fully assessed within <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034]. The principles of mitigation with respect to both are set out in Table 9.8.1.  With respect to GCN, the appropriate ghost licence has been drafted and will be shared via Natural England. An outline Reptile Mitigation Strategy is also being prepared and will be shared when complete (anticipated by Deadline 5).
<b>E5</b>	Lack of financial support for Gatwick Greenspace Partnership impacting on delivery environmental schemes around the airport	C and O	Negative	The Applicant should commit to Gatwick Greenspace funding as set out in their Planning Statement.	See point E1	The <b>draft Section 106 Agreement</b> [REP2-004] includes the Applicant's proposed commitment to provide funding towards the Gatwick Greenspace Partnership in Schedule 6.
<b>E6</b>	Long term positive management of two existing biodiversity areas managed by the Applicant	C and O	Negative (positive if secured)	Certainty of continued management for wildlife. Inclusion required in the Outline LEMP.	See point E1	Both current biodiversity areas (Land East of Railway Line and North West Zone) are included within the Outline LEMP as they form a key component of the Ecology Strategy for the site (Section 6 of <b>ES Appendix 8.8.1 Outline Landscape, Ecology Management Plan</b> [REP2-021, REP2-022, REP2-023, REP2-024, REP2-025, REP2-026, REP2-027, REP2-028]). As such, both areas will be captured within the relevant LEMP for those sections of the Project Site pursuant to DCO Requirement 8.

E7	Unspecified approach to management and maintenance of Longbridge Roundabout and Car Park B Mitigation Area. This includes detail relating to maintenance of the proposed footbridge and path	O	Positive – if detail provided	Detail on legal mechanism for securing.	Compulsory acquisition point	<p>Both Longbridge Roundabout and Car Park B habitat creation areas are included within the Outline LEMP as they form a key component of the Ecology Strategy for the site. As such, both areas will be captured within the relevant LEMP for those sections of the Project Site pursuant to DCO Requirement 8. The LEMPs will set out the management and maintenance requirements and must be complied with.</p> <p>The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> includes provision for the local authority to manage and maintain the Church Meadows Replacement Open Space and the Applicant will retain the responsibility to manage and maintain the Car Park B Replacement Open Space.</p>
E8	The Applicant's River Mole diversion scheme may aid the spread of non-native invasive species	C and O	Negative	Need for invasive non-native species management plan.	NPPF, para 186 Policy ENV8, ENV13, ENV14 MV Local Plan DMP Policy NHE4  Reigate and Banstead	<p>A full INNS Management Strategy during construction will be produced. An Outline INNS Management Strategy is to be included as an Annex to the CoCP at Deadline 4.</p> <p>The principles of operational INNS management are set out in the <b>ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan</b> (Doc Ref. 5.3) and will therefore be incorporated into relevant LEMPs pursuant to DCO Requirement 8.</p>
E9	No compensation provided for loss of ponds	C	Negative	Replacement ponds should be provided off-site – preferably within the nearby Biodiversity Opportunity Areas to maximise ecological opportunities /outcomes. If birdstrike is really a concern, offsite should be considered.	NERC Act 2006  NPPF, para 186 Policy ENV13, ENV14  MV Local Plan DMP Policy NHE4  Reigate and Banstead Policy CSP 17 of Tandridge Core Strategy	<p>As set out in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>, the two ponds impacted by the Project (Pond A and Pond F) are both surface water management features and not S41 Priority ponds; they are considered to have no more than local ecological value. The impacts to these ponds were considered to be of no more than minor adverse significance. Provision of new ponds within the Airport is highly unlikely to be possible due to aircraft safety and bird strike risks.</p> <p>Although no new ponds are proposed, the Project will provide substantial new areas of aquatic habitat in the</p>

						form of new reedbeds and the extension to the River Mole.
<b>E10</b>	<p>Compensation and enhancement measures will be required to address ecological impacts which will extend beyond the Project site boundary into the surrounding countryside. Insufficient opportunities for biodiversity enhancement identified.</p>	C and O	Negative	<p>The JSCs request a landscape and ecology enhancement fund to support projects on publicly and privately owned land targeting landscape enhancement. The core Project area would be within 10km of Gatwick Airport.</p>	See Point E1	<p>GAL does not consider that a specific landscape and ecology fund is required. Within the NRP scheme significant measures are secured to improve the landscape and ecology of the area surrounding the airport. Further, the contribution to the GGP is to support development of the landscape and ecology in the surrounding area. Landscape and ecology projects which are for the public benefit could also be eligible for funding through the London Gatwick Community Fund. GAL sees benefit in coordinating efforts in this area rather than setting up a series of separate funds.</p> <p>Ecological impacts of the NRP that extend beyond the project boundary have been assessed in <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034] Section 9.4 of Chapter 9 of the Environmental Statement explains the assessment methodology which was used in carrying out the impact assessment and paragraphs 9.4.6 to 9.4.12 describe how the zone of influence (Zol) for the assessment was determined. This includes for receptors outwith the DCO boundary such as designated sites and mobile protected species such as bats and great crested newts.</p> <p>Section 9.9 of Chapter 9 of the Environmental Statement sets out the impact assessment of the NRP alone,. Section 9.11 addresses the potential for cumulative effects.</p> <p>The conclusion of both sections is that there would be no significant effect on any receptor, following the application of the mitigation designed into the Project, as set out in Section 9.8 of the chapter.</p> <p>As no effects were identified this is not considered necessary.</p> <p>The Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [REP2-004] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick</p>

						Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.
<b>E11</b>	Compensation and enhancement measures will be required to address ecological impacts which will extend beyond the Project site boundary into the surrounding countryside.	C and O	Negative	A new role is needed to manage and distribute the Landscape and Ecology Enhancement Fund and to help identify and coordinate the delivery of projects on the ground.	See Point E1	As per the above response.
<b>E12</b>	Insufficient consideration of process for environmental monitoring and compliance	C and O	Negative	Reporting of monitoring data should be reported to and reviewed by a steering group. This process must be detailed in the oLEMP.	See Points above	The approach to monitoring of the establishment and on-going management of habitats is set out in Section 10.19 of <b>ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan</b> (Doc Ref. 5.3). Monitoring data will be provided to the Local Authority for information. The approach provides for the on-going monitoring of a range of species along with the condition of the habitats, both to be created and already established. Such information will ensure that the progress of the Ecology Strategy (as set out in Section 6 of <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3) can be tracked and any remedial measures adopted if issues arise.

### 3.8 Geology and Ground Conditions

3.8.1 The Joint Surrey Councils do not consider there to be a requirement for mitigation of obligation to address geological matters. The Applicant has no further response to this.

#### **Table 3.4: The Applicant's response to matters raised on geology and ground conditions**

### 3.9 Water Environment

3.9.1 The following table sets out the Applicant's response to matters raised on Water Environment.



Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
W1	Impact on SCC carrying out statutory duties.	C	Negative	<p>Protective Provisions for drainage authorities to be included in DCO.</p> <p>This would include design principles that the Applicant will follow so SCC can be assured that works will be in line with what we would require.</p>	SCC LLFA responsibilities under land Drainage Act 1991	<p>The Applicant notes that the Joint Surrey Councils propose that the protective provisions for the benefit of Surrey County Council in respect of ordinary watercourses in the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 be replicated in the draft DCO. The Applicant will review the need for the inclusion of this drafting but considers it unlikely to be necessary in light of the revision to article 47 in the <b>draft Development Consent Order</b> (Doc Ref. 2.1) submitted at Deadline 3 detailed immediately below.</p>
W2	Impact on SCC carrying out statutory duties.	C	Negative	<p>Revisions required to Code of Construction Practice Annex 1 – Water Management Plan to correctly reference processes relating to ordinary watercourse consent</p>	SCC LLFA responsibilities under Land Drainage Act 1991	<p>In version 6.0 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) submitted at Deadline 3, the disapplication of section 23 of the Land Drainage Act 1991 in article 47 has been removed. This reflects that the Applicant only anticipates requiring ordinary watercourse consent in respect of one component of the Project, the extension to the culvert to the east of Balcombe Rd on the Haroldslea Stream. The</p>

						Applicant is content for the existing regime for ordinary watercourse consent to apply in respect of this singular instance and therefore does not propose to disapply this regime or replace it with bespoke arrangements in protective provisions included in the DCO.
<b>W3</b>	Impact on SCC carrying out statutory duties	C	Negative	Revisions required to schedule 1 and 2 of dDCO for accuracy purposes. For example foul water drainage is not reviewed by the LLFA	SCC LLFA responsibilities under Land Drainage Act 1991	The Applicant invites the Joint Surrey Councils to specify precisely what amendments they require to Schedules 1 and 2 so that the Applicant can consider these and incorporate them where necessary.
<b>W4</b>	Impact on communities and local environment living around the Horley Sewerage Treatment Works	C and O	Negative	Requirement to deliver additional foul water flow capacity early in the project's delivery	ANPS- Paragraph 5.173 RBBC DMP Policy INF1	Discussions with Thames Water and capacity studies are ongoing to determine how additional flows due to the project can be accommodated at the Crawley and Horley WWTWs. The Applicant has further explained its position in the <b>Applicant's response to ExA WE.1.8</b> (Doc Ref. 10.16).

### 3.10 Traffic and Transport

3.10.1 The following table sets out the Applicant's response to matters raised on Traffic and Transport.

**Table 3.5: The Applicant's response to matters raised on traffic and Transport**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
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<b>TT1</b>	<p>Construction traffic</p> <p>The Applicant states construction vehicles will travel via the M23 Spur only to get to/from the construction sites. What is unclear is what the impacts to the local roads / communities could be if this is not ensured; for example severance, pedestrian delay/amenity, driver delay, fear and intimidation, safety, noise and air quality.</p> <p>The Applicant estimates 40 vehicles will get to/from the construction sites per hour in the peak construction period.</p>	<b>C</b>	Negative (potential)	<p>SCC require the Applicant's construction to operate as per the proposed routing via the M23 spur with minimal use of SCC's network. It is noted access to the Longbridge Construction Compound will require use of the Longbridge Roundabout and A217 between Longbridge and Tesco Roundabouts.</p> <p>Construction Traffic Management Plan and Construction Workers Travel Plan to be secured by obligation.</p> <p>There are deficiencies with the Code of Construction practice and an outline Communications and Engagement Management Plan should be submitted to the examination</p>	Airports NPS 2018  NPS for National Networks	<p><b>ES Appendix 5.3.2: Outline Construction Traffic Management Plan</b> (OCTMP) [APP-085] sets out the proposed approach for managing construction traffic. The outline plan identifies the preliminary proposed construction vehicle routes to ensure the safe and efficient movement of construction vehicles delivering materials to the site while reducing disruption to local and Airport traffic.</p> <p>Requirement 12 in Schedule 2 to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) provides that no part of the authorised development is to commence until a detailed Construction Traffic Management Plan(s) (CTMP) has been approved by Crawley Borough Council (in consultation with West Sussex County Council, Surrey County Council and National Highways on matters related to their functions). This detailed plan(s) must be substantially in accordance with the OCTMP. The Applicant envisages that it will be produced in collaboration between itself and its contractors prior to commencement. The detailed CTMP(s) will confirm the routing for construction traffic and access points to the construction compounds (as described in para 5.7.3 of the Code of Construction Practice). Requirement 12(3) in Schedule 2 to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) provides that the authorised development must be constructed in accordance with the approved CTMP unless otherwise agreed with CBC (in consultation with the same entities).</p> <p>The Outline Construction Workforce Travel Plan (OCWTP) identifies potential measures to facilitate efficient and sustainable travel options for the construction workforce throughout the duration of the construction of this Project.</p>
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						<p>Requirement 13 in Schedule 2 to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) provides that no part of the authorised development is to commence until a detailed Construction Workforce Travel Plan has been approved by/consulted with the same entities as for the CTMP. This detailed plan must be substantially in accordance with the OCTWP. It is envisaged that the plan's effectiveness will be monitored over the length of the Project, allowing for continuous improvement and adjustment as necessary. Requirement 13(3) in Schedule 2 to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) provides that the authorised development must be constructed in accordance with the approved CWTP unless otherwise agreed with CBC (in consultation with the same entities).</p> <p>A revised version of the CoCP has been submitted to the Examination, <b>ES Appendix 5.3.2: Code of Construction Practice</b> [REP1-021] and a <b>ES Appendix 5.3.2: Code of Construction Practice Annex 7 - Construction Communications and Engagement Plan</b> [REP2-015] was submitted as Annex 7 to the CoCP at Deadline 2. This is secured through DCO Requirement 7.</p>
<b>TT2</b>	Impact of construction on traffic Highway construction modelling shows medium to high impacts in certain locations and SCC are concerned that no mitigation has been proposed. In particular, construction activity has resulted in a high impact on Longbridge	C	Negative	SCC wish to see further mitigation during the highway construction, especially affecting the Longbridge Roundabout and Balcombe Road Bridge installation.	Surrey LTP4  Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development	<p>The assessment of impacts during the period in which the Project highway works would be under construction (Section 15.5 of the <b>Transport Assessment</b> [AS-079] is based on the anticipated construction phasing as it is currently envisaged. The Longbridge Roundabout area is part of the extent of the Project highway works and as such will be affected by traffic management and changes to the highway layout during the construction period. The traffic management arrangements which are assessed in the Transport Assessment are assumed to be in place for approximately six months. The information in <b>Transport Assessment Annex E; Highway Junction Review</b> [APP-263] indicates that Volume to Capacity (V/C) ratios at Longbridge Roundabout would be close to but within</p>

	<p>roundabout for 6-months in 2029.</p> <p>The impacts will be increased traffic at the roundabout and on other routes with traffic re-routing to avoid Longbridge roundabout.</p> <p>Similarly, construction of the Balcombe Road overbridge will require closure of Balcombe Road with associated impact on the local Road Network.</p>				<p>Policy CS17: Travel Options and Accessibility</p>	<p>100%. The strategic highway model identifies any reassignment of traffic that may occur as a result of the physical changes during the construction period and using the consistent screening criteria in <b>ES Chapter 12: Traffic and Transport</b> [AS-076], the only locations identified for further investigation in relation to driver delay are those listed in Table 12.9.13 of that Chapter.</p> <p>The details of the phasing of construction works will evolve prior to works commencing and the Applicant is committing to producing a construction traffic management plan for approval by Crawley Borough Council (in consultation with West Sussex County Council, Surrey County Council and National Highways). That commitment is secured through Requirement 12 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) .</p>
<b>TT3</b>	<p>Impact of construction on footways and Rights of Way SCC is concerned about the length and impacts of the closures and associated diversions proposed during construction for footways and Rights of Way. Concerns about Rights of Way diversions are set out in Chapter 17 on Agricultural Land Use and Recreation, with particular concerns about:</p>	C	Negative	<p>SCC requests that impacts are minimised through phasing etc, with further details provided and set out in the Construction Management Plan.</p>	<p>Airports NPS 2018</p> <p>NPS for National Networks Surrey LTP4 Reigate and Banstead Local Plan: Core Strategy 2019</p> <p>Policy CS9: Gatwick Airport</p> <p>Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p>	<p>The management of public rights of way during construction and operation of the Project is addressed in <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> [REP2-009] ('PROW Management Strategy').</p> <p>The PROW Management Strategy set out the proposed temporary and permanent stopping up and diversion plans for Public Rights of Way. Table 4.1.1 within the strategy identifies the construction activities as part of the Project that would require the temporary stopping up and diversion of PROW and the anticipated likely durations for these temporary measures.</p> <p>Detailed Public Rights of Way (PROW) implementation plans for individual PROW would be developed prior to the commencement of construction affecting each PROW. The detailed PROW implementation plans must be substantially in accordance with the PROW Management Strategy and are subject to approval by the relevant Local</p>

<p>- Horley FP360</p> <p>- Sussex Border Path along the alignment of Horley FP362a and Horley Footpath 355a</p> <p>Horley FP367</p> <p>- NCR21</p> <p>In addition there are concerns about:</p> <p>- Replacement of the River Mole Bridge northeast of Longbridge Roundabout pedestrians will need to use the northern footway and then travel anticlockwise around the whole roundabout</p> <p>- Replacement of the Balcombe Road overbridge and associated impact on pedestrians using the Balcombe Road.</p> <p>The impact will be longer journeys for pedestrians and cyclists which are less convenient and likely</p>						<p>Planning Authority (LPA) pursuant to DCO Requirement 22.</p>
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	<p>to result in alternative modes being sought.</p> <p>The construction period diversions proposed will increase severance and safety issues could act as a deterrent to cycling/walking.</p>					
<b>TT4</b>	<p>Construction accesses</p> <p>SCC is concerned that separate entrances to the South Terminal compound are proposed for HGVs (from the roundabout) and private vehicles (from Balcombe Road). Access was anticipated from the roundabout only based on previous engagement. SCC has concerns about the impact on Balcombe Road and the LRN.</p> <p>A smaller construction compound will be provided to the north east of Longbridge</p> <p>Roundabout, which will be served by a new single main entry point located on the A217</p>	C	Negative	<p>SCC require that access to the South Terminal construction compound should be from the South Terminal Roundabout only and not from Balcombe Road.</p> <p>SCC requests that a plan and further information is also provided for the Longbridge construction compound access. In particular, the existing access track is considered inappropriate in terms of width, geometry, its lack of visibility at its crossing of the shared cycle/footway and proximity with the pedestrian signals at the approach to the roundabout. We would expect to see this access being left in and left out only.</p>	<p>Surrey LTP4</p> <p>Surrey Healthy Streets</p>	<p>The <b>Outline Construction Traffic Management Plan</b> (oCTMP) <a href="#">[APP-085]</a> sets out the proposed approach for managing construction traffic and identifies the preliminary proposed construction vehicle routes.</p> <p>Requirement 12 in Schedule 2 to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) provides that no part of the authorised development is to commence until a detailed Construction Traffic Management Plan(s) (CTMP) has been approved by Crawley Borough Council (in consultation with West Sussex County Council, Surrey County Council and National Highways on matters related to their functions). This detailed plan(s) must be substantially in accordance with the OCTMP. The detailed CTMP(s) will confirm the routing for construction traffic and access points to the construction compounds (as described in para 5.7.3 of the Code of Construction Practice).</p>

	<p>just before the roundabout. The location/priority control of this entry point in line with other methods of control on the roundabout is unclear in the OCTMP/Buildability Report submitted as part of the DCO. Subsequent information provided in the Statement of Common Ground has provided some clarification via text, but SCC still has concerns without further information</p>					
<b>TT5</b>	<p>Lack of incorporation of Permit Scheme and Lane Rental Scheme Coordination of activities through the incorporation of the schemes is intended to be of benefit to the Applicant as a means of achieving positive and constructive collaborative working.</p>	C	Negative	<p>SCC requires that Lane Rental Scheme and Permit Scheme are incorporated into DCO.</p> <p>Within Surrey the Southampton to London Pipeline Project DCO, as made 7th October 2020, includes the Permit Scheme. It has proved invaluable during delivery for both parties.</p>	SCC Lane Rental Scheme SCC Permit Scheme	<p>The Applicant acknowledges SCC's request and would like to understand further the Council's position in respect of more flexibility in the charges applied for a scheme of this nature and size.</p>
<b>TT6</b>	<p>Active Travel Infrastructure The proposed development is predicated on improved mode share</p>	O	Negative	<p>The proposed active travel infrastructure should be improved to:</p>	<p>NPPF (2023) Airports NPS 2018</p>	<p>1) Shared use path provisions have been proposed across the two new bridge structures over the River Mole (A23 Brighton Road bridge and A23 London Road bridge) to reduce the required width of the overall structure</p>



<p>for sustainable modes, yet the active travel infrastructure proposed is considered indirect and insufficient. In particular:</p> <ul style="list-style-type: none"> <li>- The route via Longbridge Roundabout is being promoted as the preferred active travel route. However, SCC is concerned that: it is not the most direct route; and it is inconsistent being a mixture of fully segregated and shared use. In particular, the shared use pinch points are at the 2 River Mole bridges (Brighton Road and London Road), which are being widened anyway. As such, SCC queries why these bridges cannot be widened sufficient to enable segregation</li> <li>- the most direct route between Horley and North terminal via the</li> </ul>		<ul style="list-style-type: none"> <li>- provide a fully segregated route via Longbridge Roundabout</li> <li>- upgrade the most direct route between Horley and Gatwick Airport for pedestrians and cyclists (via the new signalised crossing of the A23 and Riverside Garden Park to North terminal and from the southern end of The Crescent through the landscaped Car park B to the South Terminal;</li> <li>- provide a new crossing of the Brighton Mainline suitable for pedestrians and cyclists to facilitate access east of the railway line; and</li> <li>-provide ROW improvements to surrounding residential areas, including Charlwood, Hookwood and Povey Cross</li> </ul>	<p>NPS for National Networks Surrey LTP4</p> <p>Surrey Health Streets</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p> <p>MVDC Core Strategy: CS18 - Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport,</p> <p>Policy S2: Combatting the Climate Emergency</p>	<p>minimising embodied carbon and the impact to the River Mole flood plain.</p> <p>It is also expected that there will be a reduction in the proportion of pedestrian users of the bridges at both of these locations due to the introduction of the pedestrian crossing of A23 London Road between Riverside Garden Park and North Terminal at the new signal junction. The route characteristics (partially built-up / inter-urban with limited building frontages) are considered to further justify the shared use provision at these locations which align with the criteria set out in LTN/120 for locations where shared use provision may be considered adequate, as summarised in paragraph 5.5.3 LTN 1/20 as follows:</p> <p>“away from the highway, and alongside busy interurban roads with few pedestrians or building frontages, shared use might be adequate (see Chapters 6 and 8).”</p> <p>In addition, the cross-sectional width proposed on the River Mole bridges respects the recommended minimum widths of shared use provision for routes carrying under 300 pedestrians per hour as given in Table 6-3 of LTN 1/20. Based on the results of the walking and cycling survey counts undertaken for the scheme, it is expected that usage numbers are likely to remain below this level in the design year with due consideration of the target mode share growth and seasonality considerations with respect to when the survey was conducted.</p> <p>2) The crossing provision on the A23 London Road and provision for the footway running alongside A23 London Road are both proposed to be pedestrian only as the Project seeks to minimise environmental impact to Riverside Garden Park. To provide a shared use provision would require a wider cross-section which would</p>
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	<p>new signalised crossing of the A23 London Road and Riverside Garden Park should be improved in entirety for pedestrians and cyclists.</p> <p>the most direct route between Horley and North terminal is from the Crescent along the west side of Brighton Mainline.</p> <p>FP362a and FP355 are currently narrow and enclosed. At the Applicant is landscaping Car Park B anyway, SCC queries why an improved route for pedestrians and cyclists cannot be provided through here from the southern end of The Crescent.</p> <p>a new crossing of the Brighton Mainline for pedestrians and cyclists to facilitate access east of the railway line is not being provided</p>						<p>lead to habitat loss and environmental impact to Riverside Garden Park.</p> <p>Cyclists are also expected to prefer to travel between Horley and the airport either via the new active travel path connection between Longbridge Roundabout and North Terminal Roundabout or via the existing NCR21 route.</p> <p>The design proposals do not prohibit upgrades of the route crossing A23 London Road if a demand is recognised as the staggered crossing and footway alongside North Terminal Link are sized for shared-use.</p> <p>With respect to the provision of a cycle route between the southern end of The Crescent and the landscaped Car park B the strategy adopted is to encourage cyclists to use NCR21 to minimise conflict between pedestrians and cyclists. With the proposed replacement open recreational space at Car Park B envisaged to be used for leisure, encouraging its use by cyclists has potential to lead to collisions. In addition, the existing pedestrian only route connecting to The Crescent is constrained by properties located either side, impeding the possibility of providing an increased cross-section which is suitable for shared-use.</p> <p>3) The proposed surface access design submitted as part of the Application does not incorporate improved crossing provision over the London to Brighton rail line. The key reasons for the decision can be summarised as follows:</p> <ul style="list-style-type: none"> <li>Existing crossing provision over the railway provides good connectivity for walkers and cyclists wishing to access the airport. The Project proposals create no additional severance effects on these existing routes.</li> <li>Design options considered would have a range of environmental impacts (e.g. vegetation loss,</li> </ul>
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	<p>-The scheme has not fully explored further improvements to the Rights of way network</p>						<p>impacts on proposed planting and increased embodied carbon), visual impacts, disruption (road and rail), constructability and cost dis-benefits, considered to be disproportionate to the value brought about by the options considered.</p> <ul style="list-style-type: none"> <li>• For residents of southeast Horley (east of the rail line), Victoria Road rail bridge provides connectivity for cyclists to NCR 21 and onward connection to airport assets and Gatwick Airport station with journey distances less than 5km. Similarly for residents of eastern and north-eastern Horley north of Victoria Road rail bridge NCR 21 crosses the rail line via an existing rail subway located approximately 440m north of Victoria Road rail bridge providing onward connectivity to/from the airport.</li> </ul> <p>4) The scope and scale of the proposed active travel improvements is sufficient to support the modal shift outlined in Chapter 14 of the <b>Transport Assessment</b> [AS-079].</p> <p>The proposed active travel provision has been developed with due consideration of schemes identified in the Reigate and Banstead Local Cycle and Walking Infrastructure Plan (LCWIP) and Crawley LCWIP to complement these proposals as well as delivering a number of their desired connectivity outcomes. Engagement was also undertaken with the local authorities on options for active travel infrastructure enhancement as part of Technical Working Group discussions prior to the submission of the Application.</p> <p>The proposed active travel improvements are designed to benefit as large a population as possible by targeting residential areas where employees reside with improved active travel infrastructure in an effort to maximise the uptake of sustainable travel. Residents of Hookwood and</p>
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						<p>Povey Cross will benefit from the proposed physical active travel improvements to infrastructure at Longbridge roundabout, alongside the A23 London Road and Longbridge Way, between South Terminal, Gatwick Airport railway station and Balcombe Road and alongside Perimeter Road North between North and South Terminals. These improvements supplement the existing active travel routes, which are already largely off-road and will be retained. No further mitigation is proposed and the active travel improvements are sufficient to support the modal shift targets set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>].</p>
<b>TT7</b>	<p>Bus and coach services</p> <p>The operation of the new runway will result in increased demand on bus and coach services using these modes to access the airport.</p> <p>The Applicant proposes no new bus routes in Surrey. There could be wide impacts and implications should third party operators fail to accommodate the growth in demand.</p> <p>The impacts would be crowding on existing services, reduction in</p>	<p>O</p>	<p>Neutral</p>	<p>SCC notes that the SAC proposes financial support to deliver the following for a minimum of 5 years:</p> <ul style="list-style-type: none"> <li>- Route 20 – enhancement to 6 buses per hour (bph) daytime, 4 bph early/late</li> <li>- Route 22 – enhancement to 2 bph in peaks, 1 bph other times</li> <li>- Route 100 – enhancement to 6bph daytime, 4 bph early/late</li> </ul> <p>SCC seek further clarification of the measures that will be put in place to ensure that this happens, why only five years are considered acceptable, and why the 420 service is not included along with more night services.</p> <p>SCC also questions whether the proposed measures are sufficient to deliver required growth in mode share change.</p>	<p>Airports NPS (2018)</p> <p>Surrey LTP4 Bus Service Improvement Plan (BSIP)</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p>	<p>The Surface Access Commitments <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] document sets out bus and coach service enhancements identified and included in the modelling work which informs the assessment. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares.</p> <p>The Applicant is committed to providing reasonable financial support in relation to the services identified, or others which result in an equivalent level of public transport accessibility. This acknowledges the need for flexibility such that investment can be redirected to different services if it is considered at the time that they would make an equivalent or greater contribution to increasing public transport mode share. Funding for bus and coach services is set out in the <b>draft Section 106 Agreement</b> [REP2-004] (paragraph 5 of Schedule 3).</p> <p>The question of funding for bus and coach services is included in Rows 2.20.4.1 and 2.20.4.3 of the <b>Statement of Common Ground between Gatwick Airport Limited and Surrey County Council</b> [<a href="#">REP1-045</a>]. The Applicant will continue to engage with Surrey County Council on</p>

	passenger amenity and journey quality which would lead to modal shift to other transport options. This would threaten the modal split required to meet the SACs.			The Applicant should consider increasing services further for those with longer journey times, such as Route 22, which takes in excess of an hour from end to end, and which may act as a deterrent to usage when there are quicker means such as the private car, or taxi.	MVDC Core Strategy: CS18 - Travel Options and Accessibility  MVDC Future Local Plan: INF1 – Transport,	this matter and provide further updates to the SoCG in due course.
<b>TT8</b>	<p>Rail services</p> <p>The operation of the new runway will result in increased demand on rail services:</p> <ul style="list-style-type: none"> <li>- Brighton Main Line: By 2047, the Seated Load Factor exceeds 1.0 along the ensure route north of Gatwick into London during the AM peak (meaning seats all occupied, standing capacity only remains). A combined impact of London bound commuters and Gatwick arrivals using these services.</li> <li>- North Downs Line. The main impacts in terms of service crowding are identified in 2032 between Redhill and Reigate,</li> </ul>	O	Negative	SCC consider that a contribution is required to the proposed Network Rail schemes assumed in the baseline should be provided to ensure that they are delivered	<p>Surrey LTP4</p> <p>A new Rail Strategy for Surrey, March 2021</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS17: Travel Options and Accessibility</p> <p>MVDC Local Plan (20002): MOV13 – Railway network and interchange facilities.</p> <p>MVDC Core Strategy: CS18 -</p>	<p>A comprehensive assessment has been undertaken for rail capacity which is set out in Section 9 of <b>Transport Assessment</b> [AS-079] and in <b>ES Chapter 12: Traffic and Transport</b> [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>Following Issue Specific Hearing 4, further clarifications were provided on rail passenger modelling in Appendix C of <b>10.9.7 The Applicant’s Response to Actions - ISHs 2-5</b> [REP2-005].</p> <p>The Applicant will continue to work with Network Rail and Train Operators on potential future improvements.</p>

	<p>with worsening conditions by 2047.</p> <p>The implications of the increased levels of crowding on existing services would be poor quality journeys and reduction in passenger amenity which could result in a shift in mode towards private car or other transport options. This threatens the mode share level of rail usage, needed to meet the SACs for the Project</p>				<p>Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport</p> <p>S2 – Combatting the Climate Emergency</p>	
<b>TT9</b>	<p>Highway impact – modelling</p> <p>SCC is concerned that the highway impact is inaccurate/not fully understood, resulting in infrastructure that is not appropriate or extensive enough. In particular, the VISSIM model is limited in extent and should be extended to cover:</p> <ul style="list-style-type: none"> <li>• A23/Massetts Road</li> <li>• A23/Victoria Road</li> <li>• A217/Tesco roundabout</li> </ul>	O	Negative	Extension of VISSIM model to cover junctions and understand impact of Surrey’s LRN	<p>Airport NPS 2018 Paragraph 5.14 Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility MVDC Local Plan (2000):</p>	<p>The highway impacts reported in the DCO 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. 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</p>

	<p>A217/Hookwood Roundabout</p> <p>The Covid sensitivity testing has resulted in some new impacts on the Local Road Network – e.g. A217/Meath Green Lane in Horley and Effingham Road/Copthorne Bank in Copthorne. SCC is concerned that the VISSIM model does not cover these areas and that no mitigation is proposed.</p>				<p>Policy MOV2 – Movement implications of development</p> <p>MVDC Core Strategy: CS18 - Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport</p>	<p>directly into the VISSIM models, and as such impacts outside the extents of the VISSIM model are consistently addressed in the strategic modelling. The additional locations identified in relation to the post-Covid study are over 2km from the current VISSIM model extents, and therefore would not be expected to have a direct impact on the operation of the VISSIM network.</p>
<p><b>TT10</b></p>	<p>Highway impact – pedestrians &amp; cyclists</p> <p>The modelling shows highway links in all assessed years with increased traffic/speeds causing severance impacts for pedestrians and cyclists.</p> <p>Locations within Surrey’s LRN with &gt;30% increase in flows in either peak period are:</p> <ul style="list-style-type: none"> <li>• 2029 Reigate Road – Povey</li> </ul>	<p>O</p>	<p>Negative</p>	<p>Wider active travel improvements to mitigate the highway impact on pedestrians and cyclists.</p>	<p>Airport NPS 2018 Paragraph 5.14</p> <p>Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility MVDC Local Plan (2000):</p>	<p>The assessment reported in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>] has been undertaken in accordance with IEMA guidance and the sensitivities of the links and associated receptors have been considered alongside the increases in traffic indicated in the modelling. Although there are increases in traffic, the overall impact on severance for the links identified is identified as minor adverse, which is not significant.</p> <p>Further work was also undertaken to respond to a request from the ExA to review the assessment in the light of updated guidance issued by IEMA in 2023. This is reported in <b>Technical Note: Impact of Latest IEMA Guidance (2023) on the Assessment of Effects Related to Traffic and Transport</b> [<a href="#">AS-119</a>] and concludes the overall impact of the Project on severance would remain minor adverse, which is not significant.</p> <p>The Project includes surface access improvements works</p>

	<p>Cross (North of the Airport)</p> <ul style="list-style-type: none"> <li>• Lee Street, Pankhurst Road – Vicarage Lane</li> <li>• 2032</li> <li>• A217 London Road, Longbridge Roundabout</li> <li>• A217 London Road/ A217 Reigate Road</li> <li>• 2047</li> <li>• A217 London Road, Longbridge Roundabout</li> <li>• A217 London Road/ A217 Reigate Road</li> <li>• A23 London Way</li> </ul> <p>The severance and safety issues caused by the increased traffic along highway links could deter people from choosing to walk and cycle and threaten the mode share targets if unmitigated.</p>				<p>Policy MOV2 – Movement implications of development</p> <p>MVDC Core Strategy: CS18 - Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport</p>	<p>which improves walking and cycling routes to and from the airport. No further mitigation is required on active travel in EIA terms.</p>
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<b>TT11</b>	<p>Highway impact – Longbridge Roundabout</p> <p>Increased traffic will cause busy conditions at Longbridge Roundabout in both the AM and PM peak. Spare capacity is limited at the junction. The model analysis shows that the proposed highway improvement at this location is not able to mitigate the impact of the proposed development.</p> <p>As a result of the busier conditions and limited capacity, there will be longer journey times and congestion experienced by highway users at this location.</p>	O	Negative	<p>SCC request further mitigation is considered. This includes:</p> <ul style="list-style-type: none"> <li>-Provision and agreement of the lane widths and lane numbers on entry and exit to/around the Longbridge Roundabout.</li> <li>-The 2-to-1 lane merge on the A23 southbound roundabout exit may need lengthening</li> <li>-The length of the splitter island on the A217 arm at the Longbridge Roundabout appears excessively long and may affect approach lane widths</li> </ul>	<p>Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019</p> <p>Policy CS9: Gatwick Airport</p> <p>Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p> <p>MVDC Local Plan (2000): Policy MOV2 – Movement implications of development</p> <p>MVDC Core Strategy: CS18 - Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport</p>	<p>The proposed highway works which form part of the Project would bring significant reduction in queuing and delay at Longbridge roundabout in the VISSIM modelling in all with Project scenarios, in part due to alternative localised routeing provided by the new A23/North Terminal junction. Full details on Longbridge roundabout's entry and exit widths and the number of lanes have been shared with Surrey County Council as part of technical engagement. The entry and exit widths for the A23 London Road and A217 roundabout approach arms are greater than the desirable minimum required by DMRB. Final lane widths at Longbridge Roundabout will be subject to agreement with Surrey County Council at the detailed design stage as part of technical approvals in accordance with Schedule 2, Clause 5 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p>The 2-to-1 lane merge on the A23 southbound exit is longer than the existing arrangement. Exit merge configurations on the A23 northbound or southbound, combined with signal control co-ordination, do not show blocking back into the junction in the VISSIM modelling in any of the with Project scenarios. The final road marking provision will be subject to further refinement in consultation with local highway authorities at the detailed design stage to optimise the layout.</p> <p>Further widening to the east at this location to increase the length of the 2-to-1 lane merge would lead to increased environmental impacts due to additional loss of planting adjacent to the River Mole, a reduction in existing flood capacity and an increased scope of structural works (with associated carbon footprint impacts) as well as leading to increased costs.</p> <p>The A217 splitter island does not affect lane widths. The extended length of the splitter island on the A217 is</p>
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						intended to enhance safety for road users by preventing northbound drivers from attempting to cross three live lanes of traffic to access the Gatwick Dairy Farm access located to the northwest of the A217.
<b>TT12</b>	<p>Highway impact – A23/North Terminal signalised junction SCC is concerned about queuing back from the new A23/ North Terminal signalised junction affecting the Longbridge Roundabout to U-turn to return to the M23. SCC has requested queuing information accordingly.</p> <p>The provision of the left turn from the North Terminal onto the A23 London Road makes travel by car easier for staff, which could work against the mode share targets.</p>	O	Negative	<p>SCC require queue length information to check whether queueing back from the new A23/ North Terminal signalised junction affects the Longbridge Roundabout, with mitigation proposed if it does.</p> <p>SCC requires provision of the left turn to be reviewed or for the Applicant to adopt a Green Controlled Growth approach as per Luton Airport.</p>	<p>Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p>	<p>Introduction of the A23/North Terminal signalised junction provides an alternative route for vehicles which currently U-turn at Longbridge roundabout to return to the M23, providing traffic heading from the A23 London Road the ability to turn right at North Terminal roundabout and then turn right at the new junction towards the M23. Traffic from North Terminal can also turn right towards the M23, or to the A23 southbound at the new junction. The left turn from the new A23/North Terminal junction from North Terminal heading northbound on A23 London Road predominantly serves buses, staff and local traffic. The design is configured to provide comparatively low capacity for left turners to encourage passenger traffic to head towards the strategic road network rather than through the local highway network.</p> <p><b>Transport Assessment Annex C - VISSIM Forecasting Report</b> [APP-261] contains average speed plots at a half hourly level which provides a proxy estimate of queuing extent. This is not expected to vary at a shorter time period as the demand profiling is sufficiently aggregate. The variability between the 20 analysis runs used for reporting (using different random seeds) shows a good level of consistency indicating that the models are providing stable results. The Applicant is working through queries on queue lengths with National Highways and additional material to support the understanding of queuing behaviour is being prepared. This can be shared with SCC when it becomes available.</p>
<b>TT13</b>	Highway impact – Woodhatch Road/Dovers Green Road/Cockshot Hill	O	Negative	Mitigation measures need to be considered at this location.	<p>Surrey LTP4</p> <p>Reigate and Banstead Local</p>	Page 49 of <b>Transport Assessment Annex E: Highway Junction Review</b> [APP-263] shows that the junction is identified to experience a medium impact in the PM peak with an increase of 96 vehicles, of which only 11 would be

	<p>junction Modelling shows capacity issues at Woodhatch Road/Dovers Green Road/Cockshot Hill junction in 2047.</p> <p>The junction is operating very close to capacity (V/C ratios of 96% to 99%) with an increase in vehicles of around 100 in the PM peak.</p> <p>The impact is that a small change in vehicles is likely to increase delays / congestion significantly at this junction.</p>				<p>Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p>	<p>related to the airport. By 2047, the V/C ratio would be less than 100% in the PM peak and the additional traffic introduced by the Project at this location would be very small. It should also be noted that the junction is expected to experience very small changes in the amount of airport-related traffic in other modelled periods, including the morning peak period. Given the small level of additional airport traffic and the performance of this junction at less than 100% V/C in the PM peak, the impact of the Project would be small and no mitigation would be required.</p>
<b>TT14</b>	<p>Highway impact – Woodroyd Avenue/Brighton Road junction in Horley</p> <p>Modelling shows capacity issues at Woodroyd Avenue/Brighton Road junction in Horley.</p> <p>The maximum V/C is modelled at 91% (in the 2047 future baseline) and 93% (with the Project in</p>	O	Negative	Mitigation measures to improve performance of this junction should be included.	<p>Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p>	<p>The operation of this junction will be influenced by improvements in overall network performance delivered by the Project highway improvements which include works to Longbridge Roundabout a short distance to the southwest of this junction. Page 50 of <b>Transport Assessment Annex E: Highway Junction Review [APP-263]</b> shows that the junction is expected to have a V/C of 91% in the future baseline PM peak period in 2047, and the Project would add around 2 percentage points to the highest V/C which is in the PM peak. The operation of the junction is therefore not expected to be significantly affected by the Project and no mitigation is considered necessary.</p>

	<p>2047). As this is a non-signalised junction, a V/C value of over 85% is considered as operating at capacity.</p> <p>The impact is that a small change in vehicles is likely to increase delays / congestion significantly at this junction.</p>				Policy CS17: Travel Options and Accessibility	
<b>TT15</b>	<p>Highway impact – journey times</p> <p>There are journey time impacts experienced as a result of growth at the airport and additional volumes of traffic on the network.</p> <p>With project journey times will increase:</p> <p>between the Longbridge Roundabout and the A23 (south of M25 near Merstham) by up to two minutes northbound</p> <p>on the A217 from M23 Spur via A217 to M25</p>	O	Negative	SCC require the journey time impacts to be mitigated, especially in terms of buses	Surrey LTP4  Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development  Policy CS17: Travel Options and Accessibility  MVDC Local Plan (2000): Policy MOV2 – Movement implications of development	The Project is not expected to have a significant impact on journey times, only between 1 and 2 minutes on the routes mentioned. The numbers quoted for the A217 are actually a decrease in journey time due to the improvements introduced by the highway mitigation for the Project. Through the monitoring process, and ongoing engagement, if unforeseen highway issues at key locations are identified that are shown to be related to the Project, the Transport Mitigation Fund (secured under the <b>Draft Section 106 Agreement [REP2-004]</b> ) would offer a potential source of funding as an intervention to resolve those issues. This can include the provision of bus priority measures.

	<p>J8 by up to five minutes.</p> <p>A22 from M25 J6 to Maresfield</p> <p>A2011/A264 from M23 J11 to East Grinstead via Crawley</p> <p>The impact will be longer journeys impacting highway users, yet no mitigation is proposed, including bus priority</p>				<p>MVDC Future Local Plan: INF1 – Transport</p>	
<p><b>TT16</b></p>	<p>Passenger and employee mode share</p> <p>The modelling and infrastructure is based on sustainable mode share targets within the SACs.</p> <p>There is a risk that the sustainable mode share targets are not met, resulting in greater traffic impact than modelled/anticipated.</p> <p>Furthermore, the plan for addressing such a situation is unclear.</p>	<p>O</p>	<p>Negative</p>	<p>That a Green Controlled Growth Framework is adopted as per the expansion of Luton Airport.</p>	<p>Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS17: Travel Options and Accessibility</p> <p>MVDC Local Plan (2000): Policy MOV2 – Movement implications of development</p> <p>MVDC Core Strategy: CS18 -</p>	<p>The Applicant has carefully considered the approach to growth and surface access commitments. The commitments being made and the way in which they are structured are appropriate in the context of the anticipated rate of growth which is forecast for dual runway operations at the airport. In addition, the Applicant refers to its submissions on the principle of managed growth, including by comparison to Luton's Green Controlled Growth approach, in Section 5 of its <b>Written Summary of Oral Submissions from Issue Specific Hearing 2: Control Documents / DCO</b> [<a href="#">REP1-057</a>].</p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>] sets out a monitoring strategy which is in keeping with the existing process for monitoring ASAS targets and the development of Action Plans in consultation with the Transport Forum Steering Group. The Sustainable Transport Fund and bus and coach contributions are secured in the <b>draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] to support the increased use of sustainable modes of travel services. The Applicant is also committing to provide a Transport Mitigation Fund,</p>

					Travel Options and Accessibility  MVDC Future Local Plan: INF1 – Transport	which is secured in the <b>draft Section 106 Agreement [REP2-004]</b> and would be available to address impacts over and above what was modelled and which were not anticipated.
<b>TT17</b>	Parking  Although the proposals include an additional 1,100 spaces, SCC is concerned that the proposed expansion will result in more offsite car parking on SCC streets.	C + O	Negative	The parking expansion should be phased.  In addition, use of and provision of onsite parking for passengers and staff, as well as associated charges, should be regularly reviewed to ensure it is appropriate (i.e. not causing an increase in offsite car parking on SCC streets, and not undermining the SAC mode share targets).  In this way, incentives for staff to travel sustainably with disincentives for car travel should be incorporated.	Airports NPS (2018) Surrey LTP4  Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development  Policy CS17: Travel Options and Accessibility MVDC Local Plan (2000): Policy MOV2 – Movement implications of development Policy RUD28 – Off-airport parking  MVDC Future Local Plan: INF2 – Parking	Please refer to the <b>Car Parking Strategy [REP1-051]</b> which was submitted at Deadline 1. Furthermore, the Applicant is committing to provide an Off-Airport Parking Support Contribution, to support local authorities in providing effective parking controls in, or monitoring, surrounding streets or taking enforcement action against unauthorised off-airport passenger car parking. This contribution is secured in the <b>draft Section 106 Agreement [REP2-004]</b> (paragraph 7 of Schedule 3).

					INF6 – Gatwick Airport	
<b>TT18</b>	<p>Broader Public and Sustainable Transport incentives to assist in achieving modal share targets a lack of provisions and interventions that would remove obstacles from use of sustainable travel modes and increase uptake.</p> <p>While there is an obvious need for additional provisions, improvement of those already in existence can be improved and provide a resource efficient solution, at least in part.</p>	C/O	Negative	<p>As part of its offer and in addition any new services, the Applicant must take actions which will encourage the use of public transport and other sustainable modes. This should include:</p> <p>Worthwhile bus, rail and coach ticketing and discount schemes for residents and passengers to make such travel affordable.</p> <p>Improvement of bus stops and/or stations on the North Downs Line and which provide key connections to Gatwick such as Dorking Deepdene which needs Access for All interventions, as well as live bus timetable data and lit shelters.</p>	<p>Airports NPS (2018) Surrey LTP4</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019 Policy CS9: Gatwick Airport Policy CS10: Sustainable Development</p> <p>Policy CS17: Travel Options and Accessibility</p> <p>MVDC Local Plan (2000): Policy MOV2 – Movement implications of development</p> <p>MVDC Core Strategy: CS18 - Travel Options and Accessibility</p> <p>MVDC Future Local Plan: INF1 – Transport</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090] sets out the commitments which the Applicant is making and on which the assessment is based. They include reference to a wider package of measures which the Applicant will deliver, including signage, information, promotion of active travel and staff incentives. The Project highway works also include enhancements and additions to the existing active travel infrastructure in the vicinity of the Airport.</p> <p>Based on the assessment of the Project in the <b>Transport Assessment</b> [AS-079] and <b>ES Chapter 12: Traffic and Transport</b> [AS-076], no further measures are required to mitigate the impact of the Project, in addition to the surface access improvement works which are part of the Project.</p> <p>Mitigation and enhancement measures adopted as part of the Project are included at Rows 2.20.4.10 to 2.20.4.12 of the <b>Statement of Common Ground between Gatwick Airport Limited and Surrey County Council</b> [REP1-045]. The Applicant will continue to engage with Surrey County Council on this matter and provide further updates to the SoCG in due course.</p>

<b>TT19</b>	S106 elements  A number of items currently contained within the draft S106 are yet to be agreed. These include:  -Sustainable transport Fund  -Transport Forum Steering Group Terms of Reference  -Transport Mitigation Fund  -Investment in bus and coach services  -Level of parking enforcement support	C/O	Negative	The Applicant to clarify and revise current S106 provisions	Airports NPS (2018) Surrey LTP4	A <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> has been shared with the Local Authorities and discussions are ongoing.
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### 3.11 Air Quality

3.11.1 The following table sets out the Applicant's response to matters raised on Air Quality.

**Table 3.6: The Applicant's response to matters raised on air quality**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>AQ01</b>	Dust and particulate matter generation (Dust Management Plan)	C	Negative	No Dust Management Plan (DMP) has been provided, but the provision of one is committed to by the Applicant within the CoCP at a later stage. It is proposed this is brought forward to	Future MVDC Policy EN12:  Pollution Control RBBC Policy CS10	This matter is included at 2.2.4.4 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a> . The Draft Construction Dust Management Plan (CDMP) shared on the 26th March has considered the items requested in the Local Impact Report and The Applicant looks



				<p>the examination phase. As a minimum the DMP should address the following:</p> <p>The DMP should identify the locations and operations likely to create the highest level of adverse impacts</p> <p>from dust ensure suitable generic mitigation.</p> <p>To include a map showing the forecast areas of High, medium, and low dust impact (without mitigation) and what activity is driving that impact.</p> <p>Provision for a suitable period of baseline monitoring prior to works commencing.</p> <p>The monitoring techniques planned, dust thresholds, monitoring durations and frequencies (where appropriate),</p> <p>The process of reviewing monitoring results including how the plan will be adjusted in response to elevated dust emissions e.g. an action plan for when monitored dust levels exceed a set threshold;</p> <p>Data sharing and reporting process with local authorities</p>	TDC Policy DP22 and TPL46	forward to receiving the LAs comments on the document at Deadline 3.
<b>AQ02</b>	Emissions from road going construction vehicles and Non-road mobile machinery (NRMM)	C	Negative	Mandatory requirement in CoCP that road going construction vehicles to meet the London Low Emission Zone standards,	RBBC Draft air quality action plan.	This matter is included at 2.2.4.5 of the <b>Statement of Common Ground between Gatwick Airport</b>

				and NRMM equipment must as a minimum meet Stage IV requirements from 2024, and stage V from 2030.		<b>Limited and Reigate and Banstead Borough Council</b> [REP1-044].  The Code of Construction Practice [REP1-021] (Section 5.8) has been updated and was submitted at Deadline 1 including a requirement for all on-road vehicles to comply with the London Low Emission Zone and the London Non-Road Mobile Machinery standards where applicable.
<b>AQ03</b>	Lack of information sharing	C	Negative	Text change in CoCP to share method statements with the local authorities, to share the communications and engagement plan with the local authorities, and to actively share the complaints received from local residents and how the matter was resolved with the local authority.		This matter is included at 2.2.4.6 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> [REP1-044]. The Draft CDMP has been shared for comment on the 26th March it has considered the items requested in the Local Impact Report and The Applicant looks forward to receiving the LAs comments on the document at Deadline 3.
<b>AQ04</b>	Construction traffic emissions	C	Negative	Construction Traffic Management Plan (CTMP) and Construction Worker Transport Management Plan (CWTMP) – A CTMP and CWTMP have been provided with the application. This is welcomed to mitigate adverse air quality effects associated with both construction traffic and construction work traffic, but additional information is required e.g. how traffic routings will be enforced, when contingency access arrangements come in, details on the delivery management system, how wheel washing will be secured and so on.	Future MVDC Policy EN12:  Pollution Control  RBBC Policy CS10 and TDC Policy DP22 and TPL46	This matter is included at 2.2.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and Tandridge District Council</b> [REP1-046].
<b>AQ05</b>	Traffic emissions and operational impacts from Aviation (Air Quality Action Plan)	O	Negative	Air Quality Action Plan - A combined operational air quality management plan has not been prepared to draw together	DEFRA Air Quality Guidance (TG22)  Flight Path to the Future (p.35) /	This matter is included at 2.2.2.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> [REP1-044].

			<p>the Carbon Action Plan and Surface Access Commitments</p> <p>documents and to specifically focus on local air quality. An AQAP is required to collate all the proposed air quality mitigation measures together, identify any further opportunities to maximise air quality benefits and avoid any unintended consequences.</p> <p>Aviation emissions are expected to be considered within the GAL AQAP. A wide range of mitigation measures for aviation sources are anticipated to be included e.g. Fixed Electrical</p> <p>Ground Power Supplies (FEGP) for new Aircraft Stands, low</p> <p>emission vehicle standards. Discussions are also proposed on the inclusion of ultrafine particulate monitoring.</p> <p>The plan will need to set out:</p> <p>what measures are the ‘embedded mitigation’ i.e. measures the airport has already assumed in place in the DCO air quality assessment so it is possible to assess if these measures are on track given the DCO application is based on all these measures being implemented,</p> <p>the additional measures intended to mitigate the increased airport related pollution as discussed in the ‘Falling Non Airport Pollution masking rising Airport</p>	<p>Aviation 2050</p> <p>para 3.127</p> <p>DEFRA Air Quality Strategy (2023) – Framework for local authority</p> <p>delivery</p>	<p>The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Deadline 2 Submission – 10.11 <b>Draft Section 106 Agreement [REP2-004]</b>. The draft AQAP considers aviation mitigation measures and ultrafine particulate monitoring and The Applicant looks forward to receiving the LAs comments on the document at Deadline 3.</p>
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				<p>Related Pollution' section above, and reflected in the emissions inventories for the with and without project scenarios.</p> <p>It is suggested that the airport also include costings for the additional measures to meet the requirements of the Sussex air quality Guidance.</p>		
<b>AQ06</b>	Need to comply with Air quality and Emissions Mitigation Guidance for Sussex (2021)	O	<p>Absence – Negative.</p> <p>If implemented neutral.</p>	<p>Proposed new measures in air quality action plan need to be costed to ensure meets the Sussex guidance.</p> <p>Final AQ action plan prior to granting of DCO.</p>	<p>Crawley Planning Policy /Air quality and Emissions Mitigation Guidance for Sussex (2021)</p>	<p>This matter is included at 2.2.2.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a>.</p>
<b>AQ07</b>	Impact of ultrafines on residents	O	Negative	<p>A commitment from the airport to fund in full from 2025 ultrafine particle monitoring (both number and size distribution) using equipment used on the UK national network at one of the council's real time monitoring sites out to 2047 or 389,000 movements whichever occurs later, including the capital replacement costs of the equipment on a 10 year basis.</p>	<p>DEFRA Air Quality Guidance (TG22)</p> <p>Flight Path to the Future (p.35) / Aviation 2050</p> <p>para 3.127</p>	<p>This matter is included at 2.2.4.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a>.</p>
<b>AQ08</b>	Odour emissions	O	Negative	<p>It is unclear from the application documents how odour emission management will be secured for the operational phase, which has historically been a cause of concern in local communities. Further discussion is required to understand how this can be secured. Discussions are also proposed on how odour monitoring may be secured. It is proposed that this may be achieved</p>	<p>Future MVDC Policy EN12: Pollution Control</p> <p>RBBC Policy CS10 and TDC Policy DP22 and TPL46</p>	<p>The Applicant has responded to the concern of odour from aviation sources at Table 4.3.1 of its <b>Relevant Representations Report</b> <a href="#">[REP1-048]</a>.</p> <p>The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers odour management and monitoring.</p> <p>Paragraphs 5.8.3 to 5.8.5 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> set out odour management procedures.</p>

				through an Operational Odour Management and Monitoring Plan.		
<b>AQ09</b>	Odour impact	O	Negative	<p>A S106 commitment to produce a two stage odour study prior to construction of the northern runway to:</p> <p>determine the ambient concentration of aviation fuel at which odours are perceived on the Horley Gardens Estate, using a tracer for aviation fuel such as 1,3,5 trimethylbenzene.</p> <p>a) subject to the concentrations determined in a) being</p> <p>sufficiently high that a field based detection system can be used, to install a monitor at the RG1 monitoring site for a 1 year period to examine the distribution of odour events and to</p> <p>understand the meteorological and operational practices that give rise to the odour issues for local residents.</p>		<p>The Applicant has responded to the concern of odour from engine fuel at Table 4.3.1 of its <b>Relevant Representations Report</b> <a href="#">[REP1-048]</a>.</p> <p>The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers odour management and monitoring.</p> <p>Paragraphs 5.8.3 to 5.8.5 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> set out odour management procedures.</p>
<b>AQ10</b>	Potential underestimation of magnitude of impact	O	Negative	Need for fully funded monitoring programme for RBBC within S106 to 2047 not to 2038 with reviews.		This matter is included at 2.2.4.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a> .
<b>AQ11</b>	Falling overall pollution levels masking rising Airport Related Pollution.	O	Negative	Need for fully funded monitoring programme for RBBC within S106 to 2047 not to 2038 with reviews.	DEFRA's Air Quality Strategy[1]  p.18 'Local authorities should consider prevention and reduction of  polluting activities	This matter is included at 2.2.4.9 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a> .

					in preference to  only taking steps to improve air quality once exceedances have been identified' 17 DEFRA (2023) Air Quality Strategy – Framework for local authority delivery. p.18.	
<b>AQ12</b>	Lack of Air Quality Modelling for 2047.	O	Negative	Production of model output for Horley Gardens. The emissions inventory for the airport shows an overall increase in emissions of 4.3 % between 2038 and 2047 with a 5.3 % increase in aviation emissions (the dominant pollution source of the airport component) over this period.  Needs to be complete to inform DCO.	Airports National Policy Statement para 5.33 'taking account of the scheme at full capacity'	This matter is included at 2.2.2.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a> .  Further detail has been provided in Deadline 1 - <b>Supporting Air Quality Technical Notes to Statements of Common Ground</b> <a href="#">[REP1-050]</a> Appendix E.
<b>AQ13</b>	Lack of confirmed funding for conventional pollutant monitoring to 2047 or 389,000 movements whichever occurs later	O	Negative	Need for fully funded monitoring programme for RBBC within S106 to 2047 not to 2038 with reviews.  Capital funding required as outlined in main text.	Flight Path to the Future (p.35) / Aviation 2050 para 3.127.	This matter is included at 2.2.4.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a> .
<b>AQ14</b>	Odour Impact	O	Negative	Changes sought in relation to Article 48 in Draft DCO, to allow residents to bring nuisance action in relation to odour as they can do at present.		The Applicant refers to its response to DCO16 below.
<b>AQ15</b>	Use of low costs sensors	O	Potentially negative	AQ monitoring data on the proposed public facing website from so called 'low cost' sensors needs to be caveated as	DEFRA Technical Guidance TG22.	The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers air quality monitoring and reporting procedures.

				'not suitable for compliance monitoring purposes'		
<b>AQ16</b>	Use of an environmentally managed growth approach	O	Neutral / Positive	The Applicant adopt an environmentally managed growth framework that includes air quality based on the appropriate UK air quality limits and thresholds e.g. Luton Green Controlled Growth Approach.		<p>This matter is included at 2.2.4.3 of the <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a>.</p> <p>In addition, the Applicant refers to its submissions on the principle of managed growth, including by comparison to Luton's Green Controlled Growth approach, in Section 5 of its <b>Written summary of oral submissions from Issue Specific Hearing 2: Control Documents / DCO</b> <a href="#">[REP1-057]</a>.</p>

### 3.12 Noise and Vibration

3.12.1 The following table sets out the Applicant's response to matters raised on Noise and Vibration.

**Table 3.7: The Applicant's response to matters raised on noise and vibration**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>NV1</b>	Noise emissions from construction activities	C	Negative	<p>Code of Construction Practice – Further information and discussion is required on noise control measures within the CoCP including but not limited to:</p> <ol style="list-style-type: none"> <li>1.Piling techniques – hydraulic piling techniques to be used for any sheet piling work in the vicinity of residential premises. Any proposed use of noisier percussive piling needs to be justified.</li> <li>2.Working hours near residential premises – Core working hours to be restricted. Mobilisation timings limited</li> </ol>	<p>Future MVDC Local Plan Policy EN12 – Pollution Control</p> <p>RBBC Policy CS10 and DES8</p> <p>TDC Policy DP22 and TPL46</p> <p>NPSE NPPF</p>	<p>Paragraph 5.9.4 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> requires the use of Best Practicable Means (BPM) including the use of low vibration equipment. ES Paragraph 14.9.65 reports the assessment of piling vibration using vibratory sheet piling concluding that significant effects are not expected. Although not expected, any requirement to use other piling techniques will be justified and the methodology to be followed to reduce in so far is reasonably practicable will be explained in the Section 61 application to the Local Authority ahead of the works commencing.</p>

			<p>and permitted mobilisation activities defined. Saturday extended hours limited to 17:00.</p> <p>3.Suitable SOAELs to be agreed for work outside core hours.</p> <p>4.Securing mitigation measures assumed in construction noise modelling i.e. specifying standards of equipment and appropriate construction noise barriers.</p> <p>5.Noise insulation and temporary housing trigger levels as set out in Table 12.1.</p> <p>6.Alternative night time accommodation in hot weather.</p> <p>7.Suitable contractor led Construction Environmental Management Plan (CEMP).</p> <p>Fixed and mobile plant at construction compounds to be assessed during night operation using BS4142 2019.</p> <p>Section 82 derogation to be suitably limited to construction activities and only for the duration of the Project.</p>		<p>Core working hours outside of the airport boundary are restricted in Section 4 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a>, at paragraph 4.2.5. Start up and shut down periods and activities allowed for mobilisation are set out in Paragraph 4.2.6. Paragraph 4.2.7 notes: In most cases, extended working hours will be from 07:00 to 22:00 Monday to Saturday (excluding bank holidays). However, any works required in extended hours will be subject to a Section 61 Agreement with the local authority that would include agreement on the hours necessary for the work to be completed as well as all noise control measures to avoid unnecessary disturbance.</p> <p>SOAELs are set in for all working hours <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> , Table 14.4.4.</p> <p>Section 5.9 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> specifies the requirements to adopt BPM including quiet plant and noise barriers. The Section 61 applications will allow the local authority to check and confirm this prior to works commencing. A conservative assumption has been applied in the assessment for how effective BPM will be to reduce noise, as detailed at paragraph 14.9.49 of Chapter 14 of the <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> so as not to over-state effectiveness for assessment purposes.</p> <p>Noise Insulation and temporary rehousing trigger levels are given in the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> andn in <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> Table 14.4.4.</p>
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					<p>Alternative night-time accommodation through temporary re-housing will be provided as a last resort if other measures are not possible to avoid residents being significantly affected by levels of construction noise inside their dwellings. Where the relevant SOAEL criteria are met, and other measures are not available, temporary night-time accommodation will therefore be provided.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> outlines the environmental management system and measures that will be in place through the construction of the Project. It ensures that best practice standards will be applied and that there is a system in place for engaging with the community and managing any complaints. <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> legally secures the implementation of environmental mitigation measures for the construction of the Project, which contractors will be required to comply with. With specific regard to noise and vibration, the section 61 applications will set out the contractor’s final noise management proposals, for approval by the local authority before work begins.</p> <p>BS4142 is relevant for permanent noise sources, not plant within construction compounds that are temporary. Noise levels for these plant will be minimised in accordance with the <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a> and agreed with the local authority through the section 61 prior agreement process. They will be assessed using the BS5228 methodology as used in the ES, on the basis of noise levels for the relevant models of plant selected by the Contractor.</p>
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						<p>Article 49 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) which provides a defence to proceedings in respect of statutory nuisance is appropriate in its scope of the matters which it provides a defence in relation to and the periods when it is applicable. It ensures the Project can be constructed, operated and maintained without proceedings being brought for statutory nuisance in connection with this, whilst ensuring the Applicant remains liable to pay compensation for such any injurious affection to land where appropriate. Necessary tests are included for when the defence is available, linked to construction noise consents and where it can be shown that the matter complained of cannot reasonably be avoided. The Applicant does not accept the suggestion that this should only apply during the construction of the Project. Please see further the <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16) at DCO.1.37.</p>
<b>NV2</b>	Induced ground- borne vibration from construction activities	C	Negative	<p>Code of Construction Practice – Further information and discussion is required on vibration control measures within the CoCP (and to be included in the CEMP) including but not limited to:</p> <ol style="list-style-type: none"> <li>1.Assessment of vibration impacts to be incorporated in a work phasing and zoning plan and exceedances of night time SOAELs identified in advance.</li> <li>2.Continuous vibration monitoring in sensitive locations.</li> </ol> <p>Percussive piling (see NV1 above).</p>	<p>Future MVDC Local Plan Policy EN12 – Pollution Control</p> <p>RBBC Policy CS10 and DES8</p> <p>TDC Policy DP22 and TPL46</p> <p>NPSE NPPF</p>	<p>The potential vibration levels from vibration during construction have been modelled and assessed, including from vibratory rollers as requested by local authorities, see <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix A - Construction Vibration</b> (Doc Ref. 10.13.1), and no significant effects are predicted. As such, continuous vibration monitoring is not likely to be required, on the basis that this will not be necessary to assure and demonstrate compliance with the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b>. Requirements to monitor vibration will be agreed with the Local Authority within the Section 61 application before work begins.</p>

<b>NV3</b>	Changes to road traffic noise levels due to construction traffic	C	Negative	Construction Traffic Management Plan (CTMP)  Construction Worker Transport Management Plan (CWTMP) – to include measures to avoid off-site parking in local communities.	Future MVDC Local Plan Policy EN12 – Pollution Control  RBBC Policy CS10 and DES8  TDC Policy DP22 and TPL46	A detailed <b>ES Appendix 5.3.2: Code Construction Traffic Management Plan</b> [APP-085] and <b>ES Appendix 5.3.2 Code of Construction Practice Annex 2: Outline Construction Workforce Travel Plan</b> [APP-084] will be submitted to Crawley Borough Council for approval (in consultation with other relevant bodies) pursuant to Requirements 12 and 13 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1.) Each detailed plan must be substantially in accordance with its respective outline plan, including the number of parking spaces allocated for each compound to mitigate the risk of unlawful parking in local residential or industrial areas and thus reduce the resultant impact on local communities.  Please also refer to the <b>Car Parking Strategy</b> [REP1-051] which was submitted at Deadline 1.
<b>NV4</b>	Air Noise (1) Estimation of potential health impacts	O	Negative	Sensitivity analysis to examine the impact of the WHO night time LOAEL of 40 dB LAeq 8h compared to 45 dB LAeq 8h and inform health impact assessment.  Updated TAG assessment using more recent exposure response functions.	NPSE NPPF  Airports NPS	The WHO do not set LOAELs. LOAELs for the UK have been set in UK policy, See <b>ES Chapter 14: Noise and Vibration</b> [APP-039] Section 14.2, which do not require a sensitivity analysis of lower levels. The TAG assessment has been completed using the current TAG methodology, there are no recognized updated response functions associated with the guidance.  ES Figure 14.9.11 shows that noise changes at the Leq 8 hr 45dB LOAEL contour are less than 1dB, so it is reasonable to assume that noise changes beyond the LOAEL contour (i.e. in areas where noise level are less than Leq 8 hr 45dB) would also be less than 1dB and hence result in environmental impacts rated as negligible effects.  A full response to the suggestion that a sensitivity test is carried out modelling noise levels below

						LOAEL is provided in <b>The Applicant's Response to ExQ1 - Noise and Vibration</b> (Doc Ref. 10.16) at question NV.1.5.
<b>NV5</b>	Air Noise (2) Noise Insulation Scheme	O	Negative	<p>Noise Insulation Scheme - DCO/Control documents need to ensure:</p> <ol style="list-style-type: none"> <li>1.Inner zone noise insulation scheme extended to full single mode Easterly and Westerly 60dB LAeq 16h noise contours of the expanded airport to mitigate day effects.</li> <li>2.Inner zone boundary definition to include one additional noise induced awakening contour to mitigate night effects.</li> <li>3.Costs of maintenance/replacement of ventilators included.</li> <li>4.Overheating risk assessment and inclusion of cost of appropriate mitigation included.</li> <li>5.Post installation monitoring to ensure effectiveness.</li> <li>6.Sensitivity assessment carried out to ensure consistency and fairness for 'divided' communities.</li> <li>7.Scheme of delivery and installation required to achieve effective and timely installation.</li> </ol>	<p>NPPF</p> <p>Airports NPS</p>	<p>The Inner Zone boundary is set at the SOAEL to avoid significant adverse effects on health and quality of life, and no awakening level is assigned to SOAEL.</p> <p>The Applicant is not proposing to pay for maintenance or replacement of acoustic ventilators.</p> <p>The <b>ES Appendix 14.9.10: Noise Insulation Scheme NIS Update Note</b> <a href="#">[REP2-031]</a> specifies the minimum fresh air supply to be provided by acoustic ventilators to allow windows to remain closed in warmer weather.</p> <p><b>ES Appendix 14.9.10: Noise Insulation Scheme NIS Update Note</b> <a href="#">[REP2-031]</a> specifies the acoustic performance requirements for the various elements of the NIS. Contractors supplying the equipment will need to demonstrate compliance with these standards that will ensure adequate sound insulation is provided. The Applicant will monitor the contractors' performance to ensure appropriate installations standards are met. This requirement will be added to an update to the NIS.</p> <p>The boundaries of the NIS are necessarily defined on the basis of noise impact. Further details on how the scheme will be delivered to ensure all communities are fairly provided for are given in 5.3 <b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> <a href="#">[REP2-031]</a>.</p> <p><b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> <a href="#">[REP2-031]</a> confirms when different</p>

						zones of the scheme will be launched to ensure timely installation.
<b>NV6</b>	Air Noise (3) Noise Envelope	O	Negative	<p>Noise Envelope – current proposal not considered fit for purpose as does not align with policy requirements and management and enforcement proposals inadequate.</p> <p>In particular, DCO/Control documents in relation to the noise envelope need to ensure:</p> <ol style="list-style-type: none"> <li>1. Reflects policy on sharing the benefits of future technological improvements.</li> <li>2. Based on central case/updated fleet forecasts (not slow transition case) to reflect likely faster fleet transition.</li> <li>3. Suitable management, enforcement and review arrangements as part of an environmentally managed growth framework e.g. Luton Green Controlled Growth approach.</li> <li>4. In terms of metrics:                         <ol style="list-style-type: none"> <li>a. Additional primary control noise contour at night based on an event metric i.e. the area of the one event ‘awakening’ contour.</li> <li>b. Secondary metrics need to be capable of ‘promotion’ to primary metrics in event actual area greater than forecast: 60 dB Leq, 16 h (or 63 dB Leq, 16 h), night time 55 dB dB Leq, 8 h and annual average (Lnight) night.</li> </ol> </li> <li>5. The 2038 proposals for the envelope</li> </ol>	<p>NPPF</p> <p>Airports NPS Future MVDC Local Plan Policy EN12 – Pollution Control</p> <p>RBBC Policy CS10 TDC Policy DP22, CSP16 and TPL46</p>	<p>The Applicant has responded to the point on sharing the benefits in the <b>ES Appendix 14.9.7: The Noise Envelope</b> [APP-177] including in Row 2.16.4.17 of the Statement of Common Ground between Gatwick Airport Limited and Mole Valley District Council. Sharing the benefits was discussed at length in the Noise Envelope Group and noise Topic Working Group. See <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [AS-023]. The Applicant has explained how the Noise Envelope limits set on the slower transition fleet forecast will ensure that there is sharing the benefits off new technology that produces noise.</p> <p>The Applicant has responded to the suggestion of basing limits on the Central Case including in <b>Statement of Common Ground between Gatwick Airport Limited and Mole Valley District Council</b> [REP1-043] paragraph 2.16.4.12.</p> <p>The Applicant has responded to the queries on enforcement in row 2.16.4.20 of the <b>Statement of Common Ground between Gatwick Airport Limited and Mole Valley District Council</b> [REP1-043] including the role LPAs will play.</p> <p>The Applicant notes the LIR reference to the Heathrow 2019 PEIR and the research of Basner and Samal that suggested there should be less than one additional awakening induced by aircraft noise per night from aircraft noise bearing in mind that a healthy adult briefly awakens around 20 times during an 8-hour night period in environments without external stressors. However, this view from</p>

			<p>apply nine years after opening, 2038, 382,000 commercial movements or 384,600 total movements – whichever occurs first.</p> <p>6. Clauses around airspace change and low carbon aircraft (Appendix 14.9.7 section 6.5 and 6.6 and para 8.1.4 (APP-177)) to be removed.</p> <p>7. In the event that the health / annoyance noise exposure response functions change then within five years the noise envelope contours will be updated to reflect these changes which may necessitate a reduction in the noise contour area. i.e. if government defines a LOAEL as 48 dB LAeq, 16h then the area currently assigned to the 51 dB LAeq, 16h would be assigned to the 48 dB LAeq, 16h.</p> <p>8. The applicant needs to undertake an assessment of historical forecast noise levels (2005 to 2019) vs. actual noise levels in the forecast year to determine the appropriate trigger level to use in the noise envelope i.e. to ensure there is a realistic margin for error when setting trigger levels.</p>		<p>the researchers does not appear in any guidance or policy on aviation noise.</p> <p>Noise metrics were discussed at length in the Noise Envelope Group and noise Topic Working Group. See <b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> [AS-023] and the chosen metrics are explained in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> [APP-175] and <b>ES Appendix 14.9.7: The Noise Envelope</b> [APP-177]. A number of secondary metrics have been added to the Noise Envelope.</p> <p>Agreed, the lower Noise Envelope limits now apply whichever comes first.</p> <p>Sections 6.5 and 6.6 of the Noise Envelope explain why there must be a facility for the noise limits to increase if in the future some over-riding policy or change arises which ensures that the limits remain current to the prevailing conditions and enforced, and which must be approved by the Secretary of State. This is a necessary inclusion to account for future changes in the industry and to ensure this does not give rise to frustration with the DCO, which would be unfortunate and an unnecessary administrative burden for all parties to resolve. These inclusions will not be removed from the document.</p> <p>The Noise Envelope contours are set by reference to area which is with equal to or above the LOAEL for both the day and night periods. This is the appropriate contour level to inform communities of the area which is within this contour, taking into account current Government policy for the Air Noise LOAEL. If the LOAEL changed over time the contour could be set by reference to this, but this</p>
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						<p>would simply mean the contour is drawn to a different level and would not result in any change in the noise profile of the airport. Accordingly, it is the view of the Applicant that there would be no practical benefit to changing the level at which the noise envelope contour is drawn, and that this would likely only serve to cause confusion in communities who would not understand the reason why the contour has changed or how this then relates to the initial contours which were secured by the DCO and how the performance of the airport has changed over time, and moreover how the benefits of reductions in noise through fleet modernisation have been shared. The Applicant does not therefore propose to change level of noise on which the contour is based.</p> <p>The Noise Envelope proposed does not include trigger levels, because unlike the Luton proposal it requires forecasts five years ahead to demonstrate future compliance, rather than being backward looking. This will mean that each year it will be possible to correlate actual performance with forecasted performance, to understand the accuracy of forecasts and to best predict when any breach may occur and ensure steps are taken to address this before it occurs. In addition, to ensure the proposed forecasting process is developed and robust before the project commences operation the Applicant will carry out the noise contour forecasting and provide the first Annual Monitoring and Forecasting Report in the year before commencement of dual runway operations.</p>
<b>NV7</b>	Air Noise (4) Night movements	O	Negative	DCO requirement for a night movement cap – current DfT night noise movement cap in core night period (23:30 – 06:00) of 11,200 movements over the 218 day	NPPF  Airports NPS	The DfT regulates night movements in the core night period and will continue to do so, as they consider appropriate for the airport and its role in the south-east region. It is not considered

				summer period and 3,250 movements in the winter period not to be exceeded.		necessary or appropriate for the DCO to duplicate this regime or to layer further control on top of it.
<b>NV8</b>	Air Noise (5) Types of aircraft using northern runway	O	Negative	DCO requirement restricting routine use of the northern runway to Code C aircraft or smaller (the basis of the current proposals and assessments in the ES).	NPPF	The Applicant refers to its response to DCO.1.40 in its <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16).
<b>NV9</b>	Air Noise (6) Routine use of northern runway	O	Negative	DCO requirement that the northern runway should only be used for departures unless the southern runway is not available for use (the basis of the current proposals and assessments in the ES).	NPPF	The Applicant refers to its response to DCO.1.40 in its Response to ExQ1 <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16).
<b>NV10</b>	Air Noise (7) Survey work	O	Negative	Obligation to undertake noise survey to examine community annoyance before and after airport expansion works. Survey to be designed with academic partners in a similar vein to the UK SONA study but focused solely on Gatwick.		The Civil Aviation Authority (CAA) has been tasked with developing the new Aviation Noise Attitudes Survey (ANAS) as part of their new Noise Advisory Functions. ANAS is expected to build on lessons learnt from SONA and previous preparatory work undertaken by NatCen on behalf of the Independent Commission on Civil Aviation Noise (ICCAN) in 2021. The ANAS survey is ongoing and due to report in 2025 and is large enough to be both national and individual airports.
<b>NV11</b>	Ground Noise (1) Modelling	O	Negative	<p>Production of ground noise contour maps (LAeq,T and LAm<sub>ax</sub>) for each assessment year required to improve understanding of extent of effects and inform production of a Ground Noise Management Plan.</p> <p>Slow transition case needs to be modelled as any ground noise insulation scheme should be based on realistic worst case as a precautionary measure.</p>	NPSE	<p>An assessment of ground noise for the Slower Transition Fleet has been completed and is reported in <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground</b> (Doc Ref. 10.13), Appendix B - Ground Noise Fleet Assessment with which includes ground noise contours for the worst case year.</p> <p>This also clarifies the Noise Insulation Scheme requirements for ground noise that will be based on a worst case assessment.</p>



<b>NV12</b>	Ground Noise (2) Airport ground based activity noise emissions	O	Negative	<p>Noise barrier/ bund – It is not clear where barriers and bunds that are required to mitigate ground noise are secured. A Ground Noise Management Plan should be provided where all ground noise mitigation/ management measures are secured.</p> <p>Noise Insulation Scheme – DCO/Control documents need to ensure:</p> <p>Properties needing insulation as a consequence of ground noise identified and insulated prior to the commencement of the project opening not after the project has opened.</p> <p>Commitment to annual monitoring of the combined air noise and ground noise levels at specified locations to check no additional properties would qualify for noise insulation.</p>	NPSE  Future MVDC Local Plan Policy  EN12 – Pollution Control  RBBC Policy CS10 TDC Policy DP22, CSP16 and TPL46	<p>The ground noise barrier and bunds are part of the submitted scheme design. The need to deliver the bunds and how they shall be designed to perform their required function are matters which are secured by the Design Principles which are included at Annex 1 of the <b>Design and Access Statement Appendix 1 – Design Principles [REP2-038]</b>, and which are required to be complied with in accordance with Requirement 4 at Schedule 2 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p><b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground - Ground Noise Engine Ground Runs - Appendix E</b> (Doc Ref. 10.13) provides information not only on engine ground runs, but also includes a section on complaints due to ground noise. In 10 years from the beginning of 2010 to the end of 2019, there was a total of 16 recorded noise complaints linked with ground noise. The Airport has established procedures for managing ground noise including engine ground runs, and extensive noise mitigation in the form of noise bunds and barriers around the northern boundary of the Airport. Whilst complaints statistics can be misleading, they suggest ground noise is not a major issue for the local community. The ES has predicted increases in ground noise with generally minor impacts that do not require new operating procedures to be adopted, so there is no need for a ground noise management plan to be secured.</p> <p>As noted above 10.13.2 <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground - Ground Noise Fleet Assessment - Appendix B</b> (Doc Ref. 10.13)</p>
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						<p>provides details on properties requiring noise insulation for ground noise.</p> <p>Annual monitoring is not considered necessary, but as noted in the NIS monitoring will be undertaken where necessary in areas where ground noise may be at sufficient levels to increase the need for noise insulation.</p>
<b>NV13</b>	Road traffic noise (1) Changes to road traffic noise levels due to operational traffic	O	Negative	Barriers, traffic management and speed controls – It is not clear where measures to mitigate operational traffic noise are secured.	NPSE  Future MVDC Local Plan Policy EN12 – Pollution Control  RBBC Policy CS10 TDC Policy DP22,  CSP16 and TPL46	<p>The provision of noise barriers is secured through the <b>Design and Access Statement Appendix 1 – Design Principles</b> <a href="#">[REP2-038]</a> which the detailed design must be in accordance with, in accordance with Requirement 4 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1). In particular, Project-Wide Design Principles N1 to N3 relate to the provision of noise barriers and bunds to deliver noise mitigation associated to the operation of the Project, together with site-specific Design Principle DBF13 relating to the noise barriers within the airfield.</p> <p>Noise barriers are shown on <b>Surface Access Highways Plans – General Arrangements</b> <a href="#">[APP-020]</a>.</p> <p>Speed limits are shown on <b>Traffic Regulation Plans – Speed Limits</b> <a href="#">[APP-023]</a> and the corresponding Schedule 6 Part 1 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1)</p>
<b>NV14</b>	Road traffic noise (2) Noise Important Areas	O	Negative (as levels remain above SOAEL)	DCO/Control documents need to ensure:  Installation of a noise barrier (2m minimum) from the Longbridge Roundabout to the proposed new junction with the A23 London Road.	NPSE  RBBC Policy CS10	<p>See Paragraph 2.16.4.3 of <b>Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council</b> <a href="#">[REP1-044]</a>. RBBC was consulted when the options for a noise barrier were being considered and why it was proposed by GAL that a noise barrier (2m minimum) from the Longbridge Roundabout to the proposed new junction with the A23 London Road was no</p>

				Installation of low noise road surface on A23 London Road and Airport Way to M23.		longer needed for the preferred road layout. A further technical note has been prepared bringing together the noise assessment carried out in the <b>Traffic Noise Barrier Options Selection Report, Appendix C</b> (Doc Ref. 10.13) in Supporting Noise and Vibration Technical Notes to Statements of Common Ground This note also clarifies the position with regards low noise road surfaces and why they are would not be effective in this case.  <b>Traffic Noise Important Area Assessment, Appendix D</b> (Doc Ref. 10.13) in Supporting Noise and Vibration Technical Notes to Statements of Common Ground provides additional information on the road traffic noise modelling done in the area including validation of the model as requested.
<b>NV15</b>	Noise emissions from fixed plant	O	Negative	Acoustic design of plant and fixed noise sources – It is not clear where measures to mitigate fixed plant noise are secured.  Use of BS:4142 needs to be clarified, especially in relation to night noise. BS:4142 is not considered suitable for assessment of low frequency noise.	Future MVDC Local Plan Policy EN12 – Pollution Control  RBBC Policy CS10 TDC Policy DP22,  CSP16 and TPL46	<b>ES Appendix 14.9.3: Ground Noise Modelling [APP-173]</b> shows that the fixed ground noise sources are all a minimum of 200 m from the nearest assessment location. It is considered that given the relatively large separation distances, meeting the derived noise limits will be readily achievable through good acoustic design and no significant effects are expected. The Design Principles require the authorised development to be designed having regard to the acoustic environment, and the need to comply with those is secured by requirements 4 and 5 of Schedule 2 to the <b>draft Development Consent Order</b> (Doc Ref. 2.1) It is not considered that any further controls on fixed plant noise is required. Noise barriers are shown on <b>Surface Access Highways Plans – General Arrangements [APP-020]</b> .  Paragraph 7.1.3 of <b>ES Appendix 14.9.3: Ground Noise Modelling [APP-173]</b> confirms how BS:4142 is used in accordance with Planning Noise Advice

						Sussex supplementary planning guidance. Paragraph 7.1.5 discusses low frequency noise and highlights the CARE facility chimney as a possible source of low frequency noise. However, this chimney and hence this noise source has been removed as part of accepted <b>Change Request 01</b> [AS-124 to AS-143].
<b>NV16</b>	Loss of amenity Outside space	O	Negative	DCO/Control documents to include an appropriate compensation scheme where existing properties are permanently affected.		A scheme of financial compensation for noise impacts will not be secured by the DCO. All realistic and practicable mitigation measures are provided for, and this ensures that the authorised development meets the relevant planning policy requirements in connection with noise from aircraft associated with the operation of the airport.

### 3.13 Climate Change

3.13.1 The following table sets out the Applicant's response to matters raised on Climate Change.

**Table 3.8: The Applicant's response to matters raised on climate change**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>CC1</b>	Extreme weather and climate events have been identified as creating possible negative impacts for the construction phase impacts. E.g. construction worker health and safety and damage to construction equipment.	C	Neutral	<p>The Applicant has deemed the embedded mitigation measures sufficient, assessing no impacts as Significant and therefore no further mitigation measures required.</p> <p>The embedded mitigation for construction includes the risk assessment of extreme weather impacts the contractor is required to undertake as set out in the Code of Construction Practice (CoCP). This CoCP will also provide details on measures considered necessary to manage extreme events include flooding. These measures will be linked to the Gatwick Airside</p>	Paragraph 4.45 in the Airports NPS sets out a requirement for new airport infrastructure to consider the impacts of climate change when planning design, build and operation due to the typical long-term nature of the infrastructure.	<p>Noted.</p> <p>The Applicant confirms that their understanding of the required mitigation is correct and re-confirms the assessment conclusions for this impact on that basis.</p>

				Operations Adverse Weather Plan. The construction related mitigation is therefore secured in the CoCP.		
<b>CC2</b>	The in-combination impacts of construction of this development with climate change could exacerbate environmental impacts to air, land, biodiversity, water, and human health receptors.	C	Neutral	<p>The construction related ICCI impacts identified by the Applicant have been assessed as Insignificant due to the embedded mitigation measures secured via the Code of Construction Practice (CoCP).</p> <p>However, the Applicant needs to better demonstrate what measures they will be committing to putting into place to reduce ICCI impacts around water stress for example, how will the proposed developed meet the BREEAM criteria for water efficiency.</p>	<p>Paragraph 4.45 in the ANPS sets out a requirement for new airport infrastructure to</p> <p>consider the impacts of climate change when planning design, build and operation.</p>	<p>As set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 1 - Water Management Plan [APP-083]</b> during construction, reducing water use and stress is planned for through reducing mains water use and demand - including rainwater harvesting system and using low water use and water efficiency appliances.</p> <p>For operation, in the Design Principles [REP2-037] GAL makes a commitment to consider “<i>measures to reduce water use and increase re-use across new buildings</i>” in the detailed design of new buildings in principle BF2 under Built Form. These are secured under Requirement 4 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1).</p>
<b>CC3</b>	<p>The Applicant identified a variety of risks arising from climate change posing risks during the operational phase of the development. Such as;</p> <p>- extreme weather events affecting aircraft operations</p>	O	Neutral	<p>The Applicant has deemed the embedded mitigation measures sufficient, assessing no impacts as Significant and therefore no further mitigation measures required.</p> <p>However, we do note that only appendix A1 of the DAS is a control document.</p>	<p>The National policy documents including the ANPS and NPSNN.</p>	<p>Noted. The Applicant confirms that their understanding of the required mitigation is correct and re-confirms the assessment conclusions for this impact on that basis.</p>
<b>CC4</b>	The proposed development exacerbating environmental impacts to air, land, biodiversity, water, and human health receptors	O	Neutral	<p>The Applicant has deemed the embedded mitigation measures sufficient, assessing no impacts as Significant and therefore no further mitigation measures required.</p> <p>However, the Applicant needs to better demonstrate what measures they are committing to putting into place to reduce ICCI impacts around water stress for</p>	<p>Future MVDC Local Plan Policy EN12 – Pollution Control</p> <p>S2 – Combatting the Climate Emergency R&amp;B Policy CS11</p>	<p>As set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 1 - Water Management Plan [APP-083]</b>, during construction, reducing water use and stress is planned for through reducing mains water use and demand - including rainwater harvesting system and using low water use and water efficiency appliances.</p> <p>For operation, in the Design Principles [REP2-037], GAL makes a commitment to consider “<i>measure to reduce water use and increase re-use across new</i></p>

				example, how will the proposed developed meet the BREEAM criteria for water efficiency.		<i>buildings</i> ” in the detailed design of new buildings in principle BF2 under Built Form. These are secured under Requirement 4 of the <b>Draft Development Consent Order</b> (Doc Ref.2.1).
<b>CC5</b>	The Urban Heat Island effect was identified as a potential impact of the development. This would exacerbate the effect of climate change in the area.	O	Neutral	The Applicant has deemed the embedded mitigation measures sufficient, assessing no impacts as Significant and therefore no further mitigation measures required. However, the Applicant did note that further monitoring is required for the medium risks related to Urban Heat Island effect to check if in the future they would become high risk and therefore significant.	Future MVDC Local Plan Policy EN12 – Pollution Control  S2 – Combatting the Climate Emergency  R&B Policy CS11	Noted. The Applicant confirms that their understanding of the required mitigation is correct and re-confirms the assessment conclusions for this impact on that basis.  Further mitigation is not required to be secured for the medium risks related to the Urban Heat Island effects. However, future monitoring of risks will be required, especially for heat/overheating and drought/water stress and will be done as part of GAL’s 5-year review cycle for the Climate Adaptation Risk Assessment (GAL, 2021a <sup>1</sup> ), reporting to the Government under the ARP as part of the 2008 Climate Change Act. Although currently voluntary, all major airport and infrastructure operators currently report under the ARP and this reporting may become mandatory in the future.

### 3.14 Greenhouse Gases

3.14.1 The following table sets out the Applicant’s response to matters raised on Greenhouse Gases.

**Table 3.9: The Applicant’s response to matters raised on greenhouse gases**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
<b>GG1</b>	Unaccounted carbon emissions in the whole life carbon assessment have the potential to result in the underreporting of the	C and O	Negative	Under the IEMA GHG Assessment methodology used in the ES (APP-041), the Applicant is required to update the carbon assessment and assess all material emissions over the whole life of	IEMA methodology	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

<sup>1</sup> Gatwick Airport Limited (Gatwick) (2021) Climate Change Adaptation Progress Report

	<p>Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.</p>		<p>the proposed Scheme. If an exclusion is undertaken, this must be evidenced and be &lt;1% of total emissions, and where all such exclusions total a maximum of 5%.</p>	<p>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.</p> <p>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 the <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> (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</p>
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						<p>imported from outside the UK (approximately 70% in recent years – see <a href="https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes">https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes</a>) 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>
<b>GG2</b>	The unsustainable growth of airport operations may result in significant adverse impacts to the climate.	C and O	Negative	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism similar to the Green Controlled Growth (GCG) Framework submitted as part of the London Luton Airport Expansion Application, is considered. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicants construction activities, airport operations and surface access transportation. Similar	Airport Carbon Accreditation Offset Guidance Document	<p>The Climate Change Act places a duty on the Secretary of State to prepare “such proposals and policies as the Secretary of State considers will enable the carbon budgets that have been set under this Act to be met.” (Section 13)</p> <p>That duty lies with the Secretary of State and it is apparent that the Government has put in place a clear framework of policy to ensure that the Government’s duty and commitment is met. The Jet Zero Strategy forms part of that policy framework and, within it, the Government makes clear that its modelling demonstrates that the commitment can be met without demand management – i.e. without constraining the growth of airports. That conclusion is reached in the light of the acknowledged importance of aviation to the UK</p>



				<p>to the London Luton Airport GCG Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism.</p> <p>In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport.</p>		<p>and the critical importance of the Government supporting growth in the aviation sector, whilst meeting its binding carbon reduction targets.</p> <p>The JZS is also clear that the Government is monitoring the position closely and will take further measures if necessary, if it becomes apparent that the trajectory of aviation emissions is not being achieved. In these circumstances, a control of the type proposed by the local authority in this case would cut across the balance being struck by government and would not meet the relevant tests of necessity or appropriateness.</p> <p>Through its Airport Carbon Accreditation Level 4+ GAL buys offsets covering residual Scope 1 and 2 GHG emissions (as well as business travel). In order for GAL to maintain its ACA certification, any offsets – removal and/or reduction – must be bought from schemes accredited by the ACA.</p> <p>With a view to achieving Net Zero for Scope 1 and 2 GHG emissions by 2030 (under both its existing Decade of Change commitments, and the equivalent under the Carbon Action Plan as part of the Project), the Applicant is in the process of transitioning from use of carbon reduction offsets to carbon removal offsets instead (as the use of carbon removal offsets would not meet the definition of Net Zero). For 2023, GAL purchased 25% removal offsets and 75% reduction offsets.</p> <p>Furthermore, the Applicant is investigating the development of a local removal project, independent of the Project. Any such project will need to be accredited by the ACA.</p>
<b>GG3</b>	Shipping emissions during the transportation of	C	Negative	The Applicant needs to update the transport assessment in compliance with	N/A	Please refer to Response CG1 above.

	<p>construction materials have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.</p>			<p>the RICS methodology quoted in the ES to ensure shipping transport emissions are accounted for. This can then be used to inform appropriate transport efficiency mitigation measures as part of the CAP under Appendix 5.4.2 in the ES.</p>		<p>At the stage the likely geographic source location for materials is not known. The assessment of GHG has assumed UK sourcing of materials with an average transport distance based on RICS guidance, considering an appropriate estimate of those materials sourced locally and those sourced nationally.</p> <p>With regards to quantification of impacts from construction of infrastructure - the majority of emissions are large quantities of bulk materials (aggregate, concrete etc) which will predominantly be sourced locally. While it might be expected some small portion (by mass) may be sourced outside the UK this is likely to be minor in comparison to the large quantities of bulk materials. Any underestimation from would, therefore, be small and unlikely to be material to the conclusions of the assessment.</p> <p>The quantification of impacts from construction of buildings is based on typical embodied carbon metrics per m2 of floor area, within which a proportion of local, national, and international sourcing is already included.</p> <p>The mitigation set out in the <b>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</b>, 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 transportation and shipping as part of their wider carbon management approach.</p>
<b>GG4</b>	<p>If construction emissions are not managed in line with PAS 2080:2023 they have the</p>	C	Negative	<p>One of PAS2080:2023's foundational principles is that the earliest you implement it during the design process,</p>	N/A	<p>Part of the commitment in the CAP is that the Applicant commits to being PAS 2080: 2023 certified as the asset owner. This means that the</p>

	potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.			the more likely it is that carbon can be reduced in the design. Hence, in alignment with this principle, the Applicant should implement PAS 2080:2023 as early as possible within the design process to maximise carbon-saving opportunities.		design stages will be covered by the approach set out in PAS 2080.  In response to these comments, the Applicant has submitted the <b>Construction Carbon Management Strategy</b> (Doc Ref. 10.18) at Deadline 3 which sets out the work already undertaken and that planned to embed its approach to low carbon in construction into all relevant actions.
<b>GG5</b>	If the Applicant does not provide infrastructure or services to help decarbonise surface transport emissions it may have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified	O	Negative	The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure. Additionally, to support this movement, the Applicant should support expansion of the network of hydrogen buses used in the Gatwick area.	SCC sets a key goal for Surrey's County to achieve a 60% reduction in the Transport sector by 2035 against BAU (business as usual) as a minimum.	<p>The <b>Transport Assessment</b> <a href="#">[AS-079]</a> and the <b>Surface Access Commitments (SAC)</b> <a href="#">[APP-090]</a> set out how the Applicant's commitments to sustainable travel are binding under the DCO. Achieving the modes shares set out will significantly reduce surface transport emissions. We are continuing to invest in charging infrastructure for passengers and staff within a wider strategy for EVs on the campus as part of our Decade of Change programme independent of the DCO. This includes a partnership with Gridserve to provide an electric vehicle charging forecourt on airport, completed in early 2024. Our passenger valet parking service also offers an EV charging service. For operational vehicles there is a programme underway to deliver the Applicant's and third party airfield EV charging requirements.</p> <p>The Applicant has invested or pledged over £1m to Metrobus in hydrogen buses for the local network serving the airport and continues to support the transition to ultra low or zero emission vehicles in local bus services and in the Applicant's own surface transport fleet.</p> <p>Decarbonisation of all surface transport is a matter for Government policy and the Applicant cannot mandate that all surface access journeys are by</p>

						zero emission vehicles ahead of meeting those policy targets.
<b>GG6</b>	If the Applicant fails, the BREEAM Excellent (for water and energy credits) targets it may have adverse consequences on the environment.	C	Negative	If concluded technically and financially viable in the cost-benefit study, the Councils expect that the Applicant will implement BREEAM Excellent certification (for water and energy credits) into the Project. This standard should be specified by requirement or set out clearly within a control document	Crawley Local Plan Policy	Sustainability accreditation schemes are one way of achieving sustainable outcomes in construction. Different schemes are available for different types of assets and covering different sustainability issues. The Applicant will consider whether the use of sustainability accreditation schemes will result in sustainability outcomes that may otherwise not be achieved.

### 3.15 Socio-Economic

3.15.1 The following table sets out the Applicant's response to matters raised on Socio-Economics.

**Table 3.10: The applicant's response to matters raised on Socio-economics**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
SE1	Availability of construction labour	C	Negative	ESBS and Implementation Plan to be informed by a robust assessment of construction job skills shortages and then set clear and measurable actions clearly set out Implementation Plan.	ANPS	<p>There are no significant adverse impacts on skills or business during the construction phase identified in <b>ES Chapter 17: Socio-Economic</b> [APP-042]. As such there are no impacts that require mitigation. Section 17.8 of the ES Chapter lists the ESBS as enhancement activity and paragraph 17.13.5 reads:</p> <p><i>“moderate beneficial significant labour market effects have been identified during the operation of the Project from 2032 to 2047 at the LSA and FEMA levels. These effects would be subject to further enhancement measures as part of the ESBS. No significant adverse effects have been identified in terms of socio-economic effects.”</i></p> <p>Further detail is provided in <b>The Applicant's Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15)</p>

						<p>submitted as part of the Applicants responses at Deadline 3.</p> <p>The <b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11) will feature measures to boost local employment in the construction sector and support upskilling and retraining.</p>
SE2	<p>South Terminal Works Compound hinders development of Horley Strategic Business Park</p>	C	Negative	Relocate South Terminal Works Compound (T1 Reigate Field) to alternative location such as T3	<p>RBBC DMP</p> <p>Policy HOR9</p>	<p>The Applicant makes reference to Horley Strategic Business Park within Table 17.11.1 of Cumulative Effects Assessment within <b>ES Chapter 17: Socio-economics [APP-042]</b> 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>
SE3	<p>Lack of detail in ESBS. Further detail required on:</p> <ul style="list-style-type: none"> <li>-Local procurement strategy</li> <li>-Apprenticeship Scheme</li> <li>-Scheme for students</li> <li>-Outreach Programme</li> </ul>	C/O	Negative	Updated ESBS to be provided, including detail on areas currently lacking.	ANPS	<p>The Applicant is continuing to work with the local authorities on developing the Implementation Plan. A draft was shared with them ahead of a workshop held on 8th April. Further workshops are planned to develop the <b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11) further.</p>
SE4	Uncertainty in relation to delivery of benefits	C/O	Negative	ESBS Implementation Plan will need to be submitted for approval (and Steering Group established) at least [6 months] prior to commencement to allow for approval of the plan in sufficient time.	ANPS	<p>The local authorities are actively involved in developing the Implementation Plan and the S106 provides for it to be formally submitted to the ESBS for approval prior to commencement. Given the authorities' role in developing the Plan it will not</p>

						need six months for the Steering Group to consider and approve it.
SE5	Impact on availability of affordable housing	C	Negative	The Applicant to confirm offer in terms of housing fund (or other offer) considering evidence presented by Authorities.	R&BBC INF1	<p>The Applicant has addressed population and housing effects within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b>, including potential impacts on housing availability during the construction phase (Section 6) and potential impacts of demands for different housing tenures during the operational phase (Section 7). As confirmed at <b>Written Summary of Oral Submissions from Issue Specific Hearing 3: Socio-economics [REP1-058]</b>, para 5.2.14-15) the Applicant considers that within APP-201 the issue of affordable housing for the purposes of this application have been sufficiently addressed. The affordable housing assessment included in <b>ES Appendix 17.9.3: Assessment of Population and Housing [APP-201]</b> shows that the potential tenure demands associated with the Project are unlikely to have any impact on affordable housing demands beyond what has already been planned for.</p>
SE6	Proposed Community Fund inadequate	C/O	Negative	The Applicant to revise Community Fund proposals within draft S106	ANPS	<p>The amount of the London Gatwick Community Fund is linked to passenger numbers to ensure that funding is scaled according to passenger volumes and is therefore directly linked to the impacts of airport growth. The aim is to improve the wellbeing and vitality of communities who are, or will be, affected by the increase in passenger numbers at Gatwick Airport. Projects that will be supported benefit groups of people within communities close to, or impacted by, our operations.</p> <p>The Applicant considers the amount of the Fund is set at an appropriate scale once all other mitigation and other interventions and initiatives are taken into account and is proportionate on the basis of the information available. The size of the Fund and the</p>

						<p>provisions governing its application are considered to be fairly and reasonably related in scale and kind to the Project.</p> <p>The incremental increase in contribution from 50 mppa upwards reflects the increase in revenue that will be received as a result of the increased number of passengers and therefore the Applicant considers it appropriate to increase the contributions toward the community accordingly.</p>
SE7	Impact on local communities as a result of the construction phase of the surface accessworks and their longevity	C	Negative	Contribution to improving local community facilities in Horley	RBBC Policy CS5	<p>The London Gatwick Community Fund is proposed to be established under the <b>draft Section 106 Agreement</b> (Doc Ref. 2.1) to support those within the vicinity of the airport. Applications for funding for the improvement of community facilities would be welcomed under those funds and would be considered by the relevant awards panel on their merits.</p>
SE8	Concern that what is being proposed within the ESBS may not be additional to existing activities in this area	C/O	Negative	Updated ESBS to clarify additionality of proposals	ANPS	<p>The proposed ESBS fund would be entirely new money. It could be used to supplement or continue existing activities in the area.</p>
SE9	Training being provided by the Applicant needs to be accessible.	C/O	Positive	Travel fund to support young people, those receiving income and incapacity support benefits, ex-forces and those returning to work to access Gatwick funded training programmes for Surrey residents	RBBC Core Strategy Policy CS5	<p>The Applicant agrees that training does need to be accessible. Decisions on whether to fund travel will be taken through the development of the Implementation Plan.</p>
Para 4.25	<p>General –</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</p>	C/O	Negative			<p>The economic assessment and the traffic forecasts underpinning them reflect a realistic view of the benefits and environmental costs that would arise from the Project following best practice guidance from DfT TAG, and sensitivity analyses were undertaken around core estimates to reflect the uncertainty surrounding some of the model assumptions. In addition, in the economic assessment, conservative assumptions have been</p>

	<p>appended to the Needs Case</p> <p>(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>used throughout as summarised in Annex B of <b>Needs Case Appendix 1 – National Economic Impact Assessment</b> [APP-251]. Despite this, the assessment shows that the scheme’s overall balance of impact is strongly positive and that the Project would be expected to deliver net benefits to users and the broader UK economy.</p> <p>Regarding the catalytic impact methodology and comments made in Appendix B of <b>Deadline 1 Submission – Local Impact Report – Appendix B: Need and Capacity</b> [REP1-099] there are ongoing discussions between the Applicant and York Aviation. The Applicant has reviewed York Aviation’s comments and has identified certain aspects of the catalytic impact methodology that would benefit from clarifications as outlined below.</p> <p>For context, the Applicant is using an analytical approach designed to capture a robust link between the Project, and the employment that it stimulates around the Airport. The Applicant’s analysis concludes that, for every 1% increase in passenger traffic the Project generates, there will be 0.13% increase in jobs in the surrounding area in total (equivalent to the sum of direct, indirect, induced, and catalytic), after removing the impact of employment that would be generated anyway (displacement). In addition, the Applicant’s approach removes the impact of the effect of employment on air traffic (opposite effect) from the analysis, leaving only the causal effect of interest. As such, the Applicant’s approach is superior to estimates that would otherwise be generated using multipliers on additional air traffic, and much more likely to inform discussions around the Project’s impact on employment rates in affected local authorities.</p> <p>The Applicant provides clarifications below on the three concerns over the catalytic methodology</p>
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					<p>raised by York Aviation in their ‘Needs Case Review for Local Impact Report’ (Appendix A, paragraph 68, bullets 1-3, <b>Deadline 1 Submission – Local Impact Report</b> [<a href="#">REP1-099</a>]).</p> <p>First, the Applicant has advised York Aviation that the approach taken does not estimate levels of demand at any stage of the assessment unlike what was suggested in paragraph 68, bullet 1. The assessment uses a theoretical framework (i.e. a statistical methodology), which was developed to measure the relationship between air traffic and local employment in Italy, and applied it to the UK using UK data; it does not use outputs from an Italian study. This theoretical framework does not measure actual levels of demand for an airport, or estimate which airport the passengers actually used (distribution of demand), and does not require such information as input either to estimate a statistical relationship between air traffic (i.e. the level of activity at an airport) and local employment (i.e. the level of activity in the local area around an airport). In this framework, the level of airport activity is taken as a given (i.e. there is no need to “predict” airport demand) and econometric analysis is used to estimate an elasticity of local employment to air traffic. Given that this framework does not seek to predict actual local demand, there is no need to use CAA passenger survey data.</p> <p>Second, York Aviation suggests (paragraph 68, bullet 2) that there may be an issue with the scale of the area used in the analysis.</p> <p>In response it is helpful to point out that the relationship between air traffic and local employment estimated requires to identify a relevant geographic area of analysis, which is different from a catchment area as it does not represent the area from which the airport derives its demand (i.e. passenger catchment) but the area</p>
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					<p>in which the local employment impact of the airport would occur (i.e. where the local jobs related to airport activity will be generated).</p> <p>In the context of this assessment, there were several factors that needed to be taken into account when defining such an area:</p> <ul style="list-style-type: none"> <li>• it should be large enough that a significant share of the local employment impact of the airport would be expected to occur within the area (e.g. larger than a local authority like Crawley)</li> <li>• it should not be too large that it would be difficult to derive a robust statistical relationship between air traffic and employment (e.g. smaller than a region like the South East region with a very diverse employment pool and likely a very small impact of Gatwick traffic on overall South East employment)</li> <li>• it should be defined in a sufficiently consistent manner such that input data can be gathered for a similar area for each commercial airport in the UK (i.e. it would not be proportionate to define a bespoke area for each airport and gather the related data for all UK airports)</li> </ul> <p>Given these constraints, the Applicant has used the county/UA in which the airport is active as the assessment area. This choice necessarily implies that there are some discrepancies in geographic area sizes across the UK, however this suggests that the results of the study should be interpreted as an average impact (see discussion in Annex 5 of <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a>).</p> <p>With respect to comments made on passenger demand, as mentioned in response to the first</p>
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					<p>concern raised, this methodology does not seek to predict actual demand and therefore no assumption is made with respect to the distribution of airport demand. There is agreement with the statement made that 'employment in any of these locations cannot be safely ascribed simply to the local airport' which is exactly the purpose of this assessment, which also controls for other factors that would drive local employment, other than air traffic (e.g. population size, the size of the active population, levels of education).</p> <p>Third, York Aviation indicated that other factors that could affect employment locally e.g. Enterprise Zones, had not been taken into account (paragraph 68, bullet 3). In response it should be noted that this analysis does take into account other factors that could impact local employment such as population size, the size of the active population, levels of education. The analysis has not accounted for the type of factors suggested here because this analysis does not seek to build a bottom-up model of local employment, which would require to account for all drivers of local employment and would not be a proportionate exercise given the stated objective. Instead, this analysis seeks to estimate the elasticity of local employment to air traffic. To produce a reliable estimate of this relationship, all factors that affect both air traffic and employment need to be accounted for (as not doing so would skew the elasticity measured), but drivers of only air traffic or only employment do not need to be all included (as they would not impact the elasticity, which is the relationship between the two). Regeneration initiatives or Enterprise Zones, for example, would have an impact on local employment but they would only have an impact on air traffic to the extent that they impact employment (e.g. they would generate more local employment, which would in turn generate more business passengers).</p>
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					<p>If these factors were to be included in the analysis, the impact of employment on air traffic (the opposite relationship) would be wrongly attributed to the impact of air traffic on employment (the elasticity we are measuring) and thereby overestimate the impact of air traffic.</p> <p>To conclude, it is helpful to underline that this methodology is used to estimate the total net impact of the Project on local employment—that is to say that the employment impact derived from this analysis includes all the different employment impacts of the Project, such as the direct, indirect, and induced impacts which are separately estimated in gross terms. Catalytic impacts are derived as a residual between this total impact and the sum of the other impacts (direct, indirect, and induced). The <b>ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200]</b> (Figure 7.1) indicates that by 2047 the Project would support 12,800 jobs in the Six Authorities Area, including 6,400 direct/indirect/induced jobs combined and 6,500 catalytic jobs. On the basis that the magnitude of the total employment impact of the Project and that of the direct/indirect/induced employment impacts can be considered as reasonable given the scale of the increase of activity related to the Project, then the resulting catalytic impact (as a residual from the difference) can also be considered reasonable.</p> <p>The Applicant is continuing discussions with York Aviation to understand if the clarifications provided appropriately address the methodological concerns raised, and to what extent any remaining issues on the methodology have an impact on potential common ground regarding the scale of likely economic impacts.</p>
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Para 15.48 and 15.81	Employment –  There should be positive impacts, but the JSCs are not persuaded as to how these will be captured locally.	C/O	Positive		<p>The Applicant notes that the JSCs consider there will be positive impacts. To a very large extent these will naturally flow to local people in the same way that existing benefits do – many workers will naturally come from the surrounding towns and villages.</p> <p>The benefits will be enhanced and targeted locally through the ESBS.</p>
Para 15.51 and 15.81	Employment –  The benefits of employment generation on the project have been overestimated. While we agree that direct on-site jobs, as well as indirect and induced jobs, will be generated by the Project, it is noted that the construction jobs calculation appears to be based on a “maximum” scenario and is therefore not applying a worse-case.	C/O	Negative		<p>The local and national economic assessments and the traffic forecasts underpinning them reflect a realistic view of the benefits that would arise from the Project, and sensitivity analyses were undertaken around core estimates to reflect the uncertainty surrounding some of the model assumptions.</p> <p>The local impact assessment shows that within the Six Authorities Area, the Project will support up to 12,800 jobs and £1.11bn of GVA in 2047. The assessment shows that the NRP will contribute to increased economic activity and estimates effects that are net of displacement (i.e. removing people who would be employed anyway in the local area) such that it is unlikely to overestimate employment benefits locally.</p> <p><b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> assesses the construction workforce at different stages of the Project, not just at the peak.</p> <p>As set out in <b>The Applicant’s Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15), the workforce averages 820 across the first six years, with a peak of 1,350.</p>

Para 15.54	<p>Employment –</p> <p>The magnitude criteria (job ranges) used to assess the impact of construction employment appears to be arbitrary and simplified given it is applied across all study areas which doesn't seem to be correct given the differences in population size across each of the study areas. It is also not clear how the job ranges within the magnitude criteria were defined.</p>	C	Negative			<p>Table 2.3.1 of <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> provides further detail on population and housing effects during construction.</p> <p>The magnitude criteria set out at paragraphs 17.4.24 to 17.4.28 in <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> has been based upon industry best practice.</p>
Para 15.58	<p>Impact on delivery of Horley Business Park –</p> <p>It is noticeable that the Socio-Economic Chapter is virtually silent on the proposed Horley Strategic Business Park (HSBP). The development of the Business Park will be hindered by the location of the South Terminal Works Compound (T1 Reigate Field) and a new ransom strip.</p>	C	Negative			<p>The Applicant makes reference to Horley Strategic Business Park within Table 17.11.1 of Cumulative Effects Assessment within <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> 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. The Applicant awaits technical data from SCC to support proposed mitigation</p>

						<p>strategies. Without this data, a substantial response cannot be provided, or substantive progress made.</p> <p>Engagement and negotiations continue with SCC.</p>
Para 15.65	<p>Labour market availability –</p> <p>The sensitivity for the Local Study Area is assessed as medium which given the small size of the construction labour market would appear to be incorrect and should be graded as high.</p> <p>The Applicant advises that the Project would not require a workforce that specialises in housing development and implies that housing development activity should not be impacted significantly. However, there is a related requirement for a workforce to deliver infrastructure associated with housing development which has not been considered by the Applicant.</p>	C	Negative			<p>The Applicant has justified the sensitivity for the LSA as medium in Table 17.6.6 of <b>ES Chapter 17: Socio-economic</b> [APP-042]. As stated within Table 17.4.3, a receptor is only assessed to have high sensitivity “where a receptor has limited ability to respond to change and therefore limited potential for substitution.” This does not accurately characterize the construction labour market in the LSA. As per Table 17.6.6, it has been assessed that given recent growth in the construction labour market in the LSA it is more suitable to describe the receptor as having medium sensitivity, defined as “where a receptor has some ability to respond to change and therefore some potential for substitution.” The grading of ‘medium’ reflects the relative sensitivity of the LSA labour market compared to those at the FEMA and LMA levels, while also acknowledging the recent growth in the labour force and number of firms operating in the LSA.</p> <p>A response to this issue is provided in <b>The Applicant’s Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>
Para 15.56	<p>Labour market availability –</p> <p>The Applicant also suggests that the pool of people (230) claiming Job Seekers Allowance could help to fulfil the need for construction jobs at Gatwick given 115 of these people have a relevant</p>	C	Negative			<p>A response to this issue is provided in <b>The Applicant’s Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>

	<p>skill for construction related activity. However, these skills are applicable across both housing and infrastructure development so it is unlikely all of these 115 would be available to work on the Project. There are potential overlaps with other major infrastructure projects such as Lower Thames Crossing which will generate demand for a construction workforce.</p>					
Para 15.67	<p>Labour market availability –</p> <p>The assessment uses ONS model-based estimates of unemployment for the year July to June 2021, with rates held at this level to 2047. This dataset significantly overstates unemployment (and therefore labour market capacity) in comparison to the latest data from the 2021 Census.</p>	C	Negative	<p>The analysis should be revisited to assess using latest and most reliable information, which is now the 2021 Census.</p>		<p>Within <b>The Applicant’s Response to Actions – ISHs 2-5</b> [REP2-005] ISH3 Action Point 5, the Applicant has provided an updated assessment of population and housing effects during construction using data from the 2021 Census.</p> <p>The Applicant also notes that the ONS model-based estimates, as National Statistics, are generally preferred for socio-economic assessment as they provide more up-to-date coverage on a monthly basis, rather than Census data which provides the unemployment rate for a single date (the Census Day). Furthermore, the furlough scheme – which no longer operates – artificially decreased the unemployment rate at the time of the 2021 Census. As such, it would not be appropriate to update the analysis to use the 2021 Census unemployment rate.</p>
Para 15.69	<p>Labour market availability –</p> <p>The “primary scenario” split of where construction workers will be based is, with</p>	C	Negative	<p>Revisit approach</p>		<p>A response to this issue is provided <b>The Applicant’s Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>



	<p>80% identified as Home Based and 20% as Non Home Based which is based on Quod's Gravity Model. The model however does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA. Given the constraints in the labour supply of these local authorities, an assumption of 80% HB construction workers doesn't appear to be very realistic in practice or indeed a worse case approach.</p>				
<p>Para 15.70</p>	<p>Housing supply (temporary accommodation) –</p> <p>Chapter 17: Socio-economics of the Environmental Statement (APP-024) paragraphs 17.9.16-17.9.18 conclude that there are no significant effects on temporary accommodation for any of the Study Areas. However, we believe there are potentially significant effects on temporary accommodation at the LMA and FEMA level and have</p>	<p>C</p>	<p>Negative</p>		<p><b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201] Table 2.3.1 provides detail on population and housing effects during construction.</p> <p>A further response to this issue is provided in <b>The Applicant's Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p> <p>The magnitude criteria in <b>ES Chapter 17: Socio-Economic</b> [APP-042] has been based upon industry best practice.</p> <p>The significance of effects is based upon consideration of receptor sensitivity and the magnitude of impact. The receptor relevant to temporary accommodation is housing (at the LSA, FEMA and LMA levels), which has sensitivity</p>

	<p>concerns with the Applicants' assessment methodology in relation to both the magnitude and sensitivity criteria. In Table 17.13.1, the Applicant has stated that the sensitivity of temporary accommodation in both the LSA and FEMA is low across all scenarios but they have not provided any rationale for this grading. The sensitivity criteria presented in Table 17.6.6 does not appear to include any for temporary accommodation. In addition, Table 17.4.5 presents magnitude criteria for construction impacts. The magnitude criteria for temporary accommodation (percentage ranges) appears to be arbitrary and simplified given the same percentages are applied across both the LSA and FEMA with no rationale. It is also not clear how these ranges within the magnitude criteria were defined.</p>					<p>ranging from 'low' to 'very low' with justification provided in Table 17.6.6 of <b>ES Chapter 17: Socio-Economic</b> [APP-042]. The receptor is not specific to temporary accommodation, as the construction workforce are considered to reside in private rented or other forms of private accommodation; these are the same forms of accommodation that would form the receptor in the operational phase. The magnitude of impact is assessed to be medium, based on the detailed assessment <b>within ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201], which combined with a low receptor sensitivity would imply a minor adverse effect in EIA terms.</p>
Para 15.71	<p>Housing supply (temporary accommodation) –</p> <p>The research on vacant bed spaces is out of date and requires updating to take</p>	C	Negative	<p>The Applicant should be considering the availability of accommodation drawing this from an up-to-date position on the supply of rental accommodation. Liaison with local authorities in the FEMA could inform a more up-to-date understanding of available private rented accommodation.</p>		<p>The Applicant has provided an assessment using updated data from the 2021 Census, including updated data on vacant bedspaces, within <b>The Applicant's Responses to Actions - ISH 2-5</b> [REP2-005], ISH3 Action 5.</p>

	account of the current situation in the local areas.			Updated analysis should also take account of other cumulative schemes that will need construction workers that may require temporary accommodation.		
Para 15.72	<p>Housing supply (temporary accommodation) –</p> <p>In paragraph 6.2.3-6.2.4 of the of ES Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201), the Applicant provides an analysis of vacant properties and implies that bringing these back into use will help meet the demand generated by non home based workers. There is no analysis of why these properties are vacant, length of time vacant and barriers bringing them back into use.</p>	C	Negative	A more robust assessment of the private rental market is required.		<p>The Applicant considers that the potential demands associated with temporary construction workers has been sufficiently addressed in Section 6 of <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201] and in <b>The Applicant's Responses to Actions - ISH 2-5</b> [REP2-005], ISH3 Action 5. It should be noted that the private rented sector represents just one source of potential supply which may be used by temporary construction workers, as described in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201].</p>
Para 15.73	<p>Housing supply (temporary accommodation) –</p> <p>Reigate and Banstead remain concerned that the housing need during the construction period has taken a narrow view and misses one key consideration namely the impacts of an increase in low paid workers during construction on the</p>	C	Negative			<p>Population and housing effects during the construction and operational phases are addressed within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201] Table 2.3.1, and population and housing effects during construction using 2021 Census data within <b>The Applicant's Responses to Actions - ISH2-5</b> [REP2-005], ISH3 Action Point 5.</p> <p>A further response to this issue is provided in <b>The Applicant's Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>

	availability of the cheapest accommodation in Horley and extending to Redhill.					
Para 15.87	<p>Employment –</p> <p>While there are employment areas within proximity to Gatwick (e.g. Gatwick Business Park, Hookwood) and there are wider strategic and economic benefits which warrant the support of the airport as an economic hub, the majority of the districts employment needs are met by locations outside of the district, or within the larger settlements of Dorking and Leatherhead.</p>	O	Negative			<p>The Applicant has recruited extensively from its local area and there is no reason to think that will not continue. The share of the local workforce due to the project is forecast to remain the same as it is currently.</p>
Para 15.89	<p>Employment –</p> <p>Many of the new jobs at the airport will be low-skilled, and it is important that all opportunities are exploited to raise local aspiration and achievement locally, and to increase social mobility.</p>	O	Negative			<p>The Applicant has responded thematically to comments made within relevant representations regarding the range of employment opportunities created by the Project at Section 4.25 of its <b>Relevant Representations Report</b> <a href="#">[REP1-048]</a>.</p> <p>The range of jobs required is set out in Table A1.1 of the <b>ES Appendix 4.3.1: Forecast Data Book</b> <a href="#">[APP-075]</a> it includes pilots, IT, air traffic control, managerial and professional and a range of technical roles.</p>
Para 15.91	<p>Labour supply –</p> <p>However, the new jobs created at Gatwick could lead to labour shortages in</p>	O	Negative	<p>The Applicant should undertake local impact analysis as part of the Socioeconomic assessment to understand the potential labour shortages</p>		<p><b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> considers the local labour market context. As part of this, the size and skills profile of the market are key determinants of the sensitivity of the labour market receptor at the LSA, FEMA and LMA levels. The</p>

	<p>the local authority areas in the FEMA. This is likely to be more prevalent in low-skilled sectors (where Gatwick in the past has tended to pay higher wages than local businesses) and could mean local businesses face a struggle to find staff.</p>			<p>existing in local authority areas in the FEMA.</p>		<p>assessment finds that there is sufficient local labour and therefore it is not considered that local businesses would face any additional difficulties in recruitment as a result of the Project.</p>
<p>Para 15.93 and 15.94</p>	<p>Affordable housing –</p> <p>There needs to be a more granular assessment of housing delivery at a local authority level, in particular considering the unmet affordable housing need to inform the assessment.</p>	<p>O</p>	<p>Negative</p>			<p>The Applicant has addressed population and housing effects within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b>, including potential impacts on demands for different housing tenures during the operational phase (Section 7).</p> <p>As confirmed at <b>Written Summary of Oral Submissions from Issue Specific Hearing 3: Socio-economics [REP1-058]</b> para 5.2.14-5.2.15, the Applicant considers that within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b> the issue of affordable housing for the purposes of this of this application have been sufficiently addressed.</p> <p>The affordable housing assessment included in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b> shows that the potential tenure demands associated with the Project were unlikely to have any impact on affordable housing demands beyond what was already being planned for. The affordable housing assessment also includes analysis at local authority level (for the local authorities adjacent to Gatwick) for recent completions, local authority evidence of need, local plans and pipeline supply.</p>

Para 15.99	ESBS –  ES Appendix 17.8.1: Employment, Skills and Business Strategy (APP-198) Paragraph 4.4.2 explains that the Implementation Plan will set out activities to be delivered; the partners/stakeholders involved; governance, monitoring and reporting arrangements; and milestones, targets and outcomes. It is unclear why none of the above can be shared as part of the ESBS to demonstrate that this strategy will be both sustainable and leave a legacy. The Applicant should also provide a route map in the ESBS which explains the process from ESBS to Implementation Plan.	C/O	Negative			A draft Implementation Plan was shared with the local authorities and other key stakeholders in advance of a workshop held on 8th April. Further workshops are planned to continue developing the Implementation Plan including monitoring and evaluation, milestones, targets etc. A draft of the ESBS Implementation Plan has been provided at Deadline 3 ( <b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11)) .
Para 15.100	ESBS –  ES Appendix 17.8.1: Employment, Skills and Business Strategy (APP-198) Paragraph. 1.1.11 and Tables 5.1-5.6 provide details of options identified in the ESBS that could feature in the Implementation Plan. Whilst acknowledging that	C/O	Negative	The Applicant, as part of ESBS, should provide more detail on potential tailored initiatives that would specifically align with and support the communities within the local authorities in close proximity to the airport. Paragraph 1.1.8 of ES Appendix 17.8.1: Employment, Skills and Business Strategy (APP-198) states that the Applicant would ensure that there is effective reach into communities facing multiple barriers to gaining and sustaining		The Applicant is continuing to work with local authority partners to agree the initiatives in the draft Implementation Plan, including those that reach into communities facing multiple barriers to work. A draft of the ESBS Implementation Plan has been provided at Deadline 3 ( <b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11)).

	<p>these are defined as “options” and will be firmed up as part of the Implementation Plan and S106 process, it is noted that these options are not necessarily directly aligned with local specific issues, need and opportunity. There is no baseline information provided in the strategy which explains the current issues affecting the different local authorities from an employment, skills and business perspective which means it is difficult to conclude whether the options set out are appropriate.</p>			<p>work; it would be helpful if the Applicant specifically explained the process for how they would go about this in relation to the specific localities in question.</p>		
<p>Para 15.101</p>	<p>ESBS – Implementation Plan. The ESBS provides no explanation as to how it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a ‘Business as Usual’ scenario. The ESBS is based upon on what could be done/achieved and not what will. The strategy is not supported by clear costings or resourcing considerations, which again lessens</p>	<p>C/O</p>	<p>Negative</p>	<p>The Applicant should provide some details on performance, financial management, monitoring and reporting in the ESBS which can be developed further as part of an Implementation Plan.</p>		<p>The draft Implementation Plan that has been shared with the local authorities includes financial information as well as draft Key Performance Indicators. A draft of the ESBS Implementation Plan has been provided at Deadline 3 (<b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11)).</p>

	confidence that the outputs are achievable.					
Para 15.103	<p>ESBS –</p> <p>Whilst support for vulnerable groups is identified, the document is very light on the specific support that would be provided.</p>	C/O	Negative	<p>The baseline should aim to identify specific minority and/or marginalised groups of people and communities as well as pockets of deprivation so that these areas can be targeted, where possible to maximise economic and skill benefits on a county and regional basis and beyond. Similarly, whilst we understand that Gatwick works with Ex-Forces, it would be useful if the ESBS identified the support it would be offering.</p>		<p>Specific target groups or areas can and will be agreed through the Implementation Plan. A draft of the ESBS Implementation Plan has been provided at Deadline 3 (<b>Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11)).</p>
Para 15.104	<p>ESBS / S106 (funding) –</p> <p>The local authorities received an initial draft of the S106 in early February 2024 which included details on the funding for the ESBS. Questions have been posed to the Applicant around how the total figure to be made available for the ESBS has been calculated in relation to the measures being proposed. It is also unclear how the fund relates to the Implementation Plan.</p>	O	Negative			<p>A response has been provided to the Authorities and discussions are ongoing. The ESBS Fund will be allocated through the Implementation Plans which will be approved by the ESBS Steering Group.</p>
Para 15.108	<p>S106 / Community Fund –</p> <p>We have yet to comment</p>	O	Negative			<p>The amount of the London Gatwick Community Fund is linked to passenger numbers to ensure that funding is scaled according to passenger volumes and is therefore directly linked to the impacts of Airport growth. The aim is to improve the wellbeing</p>



	<p>on detailed drafting and a number of initial questions have been posed to the Applicant</p> <p>relating to:</p> <p>How the proposed figure has been arrived at (the total of the fund proposed is considered insufficient)</p> <p>How the fund is to be distributed – the JSCs consider it should better reflect the areas most impacted</p> <p>Prioritised projects</p> <p>Detail on the consultation that has taken place to date relating to the Community Fund</p>					<p>and vitality of communities who are, or will be, affected by the increase in passenger numbers at Gatwick Airport. Projects that will be supported benefit groups of people within communities close to, or impacted by, our operations.</p> <p>The principle of GAL's proposed approach, linking the funding scale to passenger numbers, was accepted by West Sussex County Council and Crawley Borough Council in 2022 as signatories to the current s106 Agreement.</p> <p>The Applicant considers the value of the Community Fund is set at an appropriate scale once all other mitigation and other interventions and initiatives are taken into account and is proportionate on the basis of the information available. The size of the Community Fund and the provisions governing its application are considered to be fairly and reasonably related in scale and kind to the Project.</p> <p>The incremental increase in contribution from 50 mppa upwards reflects the increase in revenue that will be received as a result of the increased number of passengers and therefore the Applicant considers it appropriate to increase the contributions toward the community accordingly.</p> <p>It is proposed that funding will be distributed within the Districts and Boroughs most affected by the airports operations, through separate Community Funds administered and distributed by the Community Foundations of Sussex, Surrey and Kent. The rationale for the proposed split is that although Gatwick Airport is located in West Sussex, it shares a boundary with Surrey and overflight is across West Kent.</p>
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					<p>With regards to the question on prioritisation of projects, the proposed London Gatwick Community Fund will give priority to those schemes, measures and projects which:</p> <ul style="list-style-type: none"> <li>- further employment, training and skills in the local area.</li> <li>- support families and children in need</li> <li>- combat social isolation and disadvantage</li> <li>- provide opportunities for young people</li> <li>- Improve access to facilities for the elderly and seek to reduce isolation in the older generation.</li> <li>- are not inconsistent with approved policies or plans of relevant local authorities;</li> <li>- have been identified as priorities to the communities within parish and/or community plans;</li> <li>- can demonstrate overall value for money in terms of cost and effectiveness;</li> <li>- can demonstrate a contribution to developing and maintaining sustainable communities</li> <li>- attract additional funding from other private and public sector sources where possible</li> </ul> <p>Consultation has taken place with the Chair and Trustees of the Gatwick Airport Community Trust and the Community Foundations of Sussex Surrey and Kent. The principle of future community funding was also included in the pre-application consultation documents and the DCO Application.</p>
Para 15.109	Community Fund –  The JSCs do not consider that such a fund will be proportionate to the environmental harm caused by the expansion of the	O	Negative		See response to Para 15.108 above.

	airport, nor sufficient to make a difference in the communities impacted, as was the Government's expectation in the Airports NPS.					
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### 3.16 Health and Wellbeing

3.16.1 The following table sets out the Applicant's response to matters raised on Health and Wellbeing.

**Table 3.11: The Applicant's response to matters raised on health and wellbeing**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>H1</b>	Noise impacts on adjacent local communities	C/O	Negative	Detail of how Noise Insulation Scheme is being targeted at those most in need	NPS-AP – NPS-NN RBBC DES9  MVDC Local Plan (2000):  Housing Development Affected by Noise   Future MVDC Local Plan: EN12:  Pollution Control INF6:  Gatwick Airport	<p><b>ES Appendix 14.9.10: Noise Insulation Scheme</b> [APP-180] describes the noise insulation that will be offered to address aircraft noise. The scheme comprises four zones with higher levels of insulation provided for the inner zones where noise levels are highest and is secured by Requirement 18 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p><b>ES Chapter 14: Noise and Vibration</b> [APP-039] sets out the primary analysis of noise on local communities and discussion of appropriate mitigation.</p> <p><b>ES Chapter 18: Health and Wellbeing</b> [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 <b>ES</b></p>

						<p><b>Appendix 14.9.10: Noise Insulation Scheme</b> [APP-180], paragraph 4.1.15.</p> <p>Deadline 2 Submission - 5.3 <b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> [REP2-031] section 2 discusses the advertising of the scheme, including at paragraph 2.1.2 that details will be provided on how the noise insulation scheme is to be promoted and administered to persons considered to be vulnerable to noise related effects to ensure equitable access to the noise insulation scheme.</p>
<b>H2</b>	Underestimation of true health cost	O	Negative	<p>As the TAG assessment is likely to be an underestimate of the health cost to the local community, a sensitivity test should be undertaken using updated exposure response functions.</p>	<p>RBBC INF1</p> <p>MVDC Local Plan (2000):</p> <p>Housing Development Affected by Noise</p> <p>Future MVDC Local Plan: EN12:</p> <p>Pollution Control INF6:</p> <p>Gatwick Airport</p>	<p>The TAG assessment is a methodology for Government transport intervention appraisal (not decision making). It serves the particular purpose of supporting business case development and investment funding decisions. It is also a methodology that recognises its own limitations. In relation to health, the methodology inputs are for a subset of health indicators, for a subset of health outcomes, for a subset of health pathways. In most cases there are not quantitative methodologies for calculating health pathway economic impacts. This includes the considerable public health benefits associated with employment and training. Whilst this may underestimate health effects (beneficial and adverse), it is not the aim of the methodology to be exhaustive and definitive, but rather to pragmatically assess different Government intervention alternatives (option appraisal) on an equivalent basis.</p> <p><b>ES Appendix 18.8.1: Quantitative Health Assessment Results</b> [APP-208] is essentially already a sensitivity test, which uses exposure response functions set out in <b>ES Appendix 18.4.1: Methods Statement for Health and Wellbeing</b></p>

						<p><a href="#">[APP-205]</a>. The exposure response functions were discussed and agreed with the Health Working Topic Group to reflect not only recent studies but also UK context. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 explains the role of the quantitative analysis is to provide 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 the UKHSA conclude <a href="#">[RR-4687]</a>:  <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></p>
<b>H3</b>	Absence of before and after studies on change in aviation noise and impact on annoyance	O	Negative	An obligation for the Applicant to undertake noise surveys to examine community annoyance both before the airport expansion works begin and after the works have been completed.	Future MVDC Local Plan: EN12:  Pollution Control INF6:  Gatwick Airport	<p>The Applicant has carried out a considerable amount of noise monitoring. The Noise Action Plan requires various monitoring and reviews in addition, and the Noise Management Board workplan adds monitoring and research projects to this from which all stakeholders learn.</p> <p>The Civil Aviation Authority (CAA) has been tasked with developing the new Aviation Noise Attitudes Survey (ANAS) as part of their Noise Advisory Functions. ANAS is expected to build on lessons learnt from SONA and previous preparatory work undertaken by NatCen on behalf of the Independent Commission on Civil Aviation Noise (ICCAN) in 2021. The focus of the study is to gather data about experience of exposure to day-time aviation noise. The survey work is being carried out in two waves. Wave 1 is complete and surveyed just over</p>

						30,000 people. The ANAS survey is large enough to be both national and individual airports including Gatwick.
<b>H4 (Also AQ07)</b>	Impact of ultrafine particle pollution on Horley Residents in particular	O	Negative	A commitment from the Applicant to fund in full from 2025 ultrafine particle monitoring (both number and size distribution) using equipment used on the UK national network at one of the council's real time monitoring sites out to 2047 or 389,000 movements whichever occurs later, including the capital replacement costs of the equipment on a 10 year basis.	DEFRA Air Quality Guidance (TG22) Flight Path to the Future (p.35) / Aviation 2050 para 3.127	The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> includes specific provision in relation to UFPs in Schedule 1.

### 3.17 Agricultural Land Use and Recreation

3.17.1 The following table sets out the Applicant's response to matters raised on Agricultural Land Use and Recreation.

**Table 3.12: The Applicant's response to matters raised on agricultural land use and recreation**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>RE1</b>	SCC not identified as relevant discharging authority within dDCO – inefficient discharging process	C	Negative	Revisions required to Requirement 22 Public Rights of Way so that responsibility for the discharge of this Requirement relating to the Public Rights of Way Implementation Plan should sit with SCC within Surrey.  Closure notices should also be received by SCC.	Aligns with roles and responsibilities within Surrey	Version 5.0 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) amended Requirement 22 such that public rights of way implementation plans must be submitted to and approved by the relevant highway authority instead of the relevant planning authority.
<b>RE2</b>	Insufficient consideration of improvements to RoW network to support sustainable travel targets (see also TT6 for further detail)	O	Negative	Additional active travel improvements should be included	NPPF (2023)  Airports NPS	Please see response to TT6 at Section 3.10 above.

					<p>NPS for National Networks Surrey LTP4 and ROWIP</p> <p>Reigate and Banstead Local Plan: Core Strategy 2019</p> <p>Policy CS17: Travel Options and Accessibility</p> <p>MVDC Core Strategy: Policy Mov2</p>	
<b>RE4</b>	<p>Article 40</p> <p>Insufficient certainty in relation to the delivery of replacement open space</p>	C and O	Negative	<p>Ordinarily, the Council would expect the order to provide for the acquisition of existing open space land only once a scheme has for the provision of the open space land has been implemented to the local planning authority's satisfaction.</p> <p>Revisions required to article 40</p>	DCO Model Provisions	The Applicant refers to its response to LV15 in Section 3.6 above.
<b>RE5</b>	<p>Unspecified approach to management and maintenance of Longbridge Roundabout and Car Park B Mitigation Area. This includes detail relating to maintenance of the proposed footbridge and path.</p>	O	Negative	<p>Detail required on legal mechanism for securing. To include detailed design and Management and Maintenance Plan, including funding arrangements.</p>	NPS-NN - 5.175/5.180	<p>Article 40 of version 6.0 of the <b>draft Development Consent Order</b> (Doc Ref.2.1) submitted at Deadline 3 requires an Open Space Delivery Plan to be submitted before the loss of any existing open space which includes a timetable for the submission of the Landscape and Ecology Management Plans for the replacement land and a timetable for the laying out of the replacement land as open space.</p> <p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [REP2-021 to REP2-027] sets the overarching vision for the Project. The LEMPs for areas of replacement open space, including management and maintenance arrangements will be submitted to and approved by the LPA before work commences as set out within</p>

						<p>Requirement 8(1) of the draft DCO. These LEMPs are required to be substantially in accordance with the principles in the outline LEMP.</p> <p>The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> proposes funding arrangements for the maintenance of the Church Meadows open space replacement area. The Car Park B replacement open space will be maintained by the Applicant in accordance with the LEMP.</p>
<b>RE6</b>	Lack of detailed design of Church Meadows	C	Negative	RBBC need to agree detail design, planting and signage of smaller Church Meadows	NPS-NN – 5.175/5.18	<p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [REP2-021 to REP2-027] sets the overarching vision for the Project and Annex 2 of the Outline LEMP contains an outline Landscape Maintenance schedule. The LEMPs for areas of replacement open space, including the detailed design, management and maintenance arrangements will be submitted to and approved by the LPA before work commences as set out within Requirement 8(1) of the draft DCO. These LEMPs are required to be substantially in accordance with the principles in the outline LEMP.</p> <p>The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> proposes funding arrangements for the maintenance of the Church Meadows open space replacement area. The Car Park B replacement open space will be maintained by the Applicant in accordance with the LEMP.</p>
<b>RE7</b>	Lack of detailed design of alterations to Riverside Garden Park and integration of Car Park B	C/O	Negative	RBBC need to agree detail design, planting and signage	NPS-NN – 5.175/5.180	<p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [REP2-021 to REP2-027] sets the overarching vision for the Project and Annex 2 of the Outline LEMP contains an outline Landscape Maintenance schedule. The LEMPs for areas of replacement open space, including the detailed design, management and maintenance arrangements will be submitted to and approved by</p>



						<p>the LPA before work commences as set out within Requirement 8(1) of the draft DCO. These LEMPs are required to be substantially in accordance with the principles in the outline LEMP.</p> <p>The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> proposes funding arrangements for the maintenance of the Church Meadows open space replacement area. The Car Park B replacement open space will be maintained by the Applicant in accordance with the LEMP.</p>
<b>RE8</b>	Protection of Grazing Animals	C	Negative	The Construction Code should include protection of grazing animals including this as part of the Agriculture liaison Officer's role	NPS-NN-5.175	Paragraph 5.12.5 of <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-012]</a> includes management measures to address the effects of construction activities on farm holdings which would include measures such as appropriate fencing to protect grazing animals.

### 3.18 Major Accidents and Disasters

3.18.1 There are no mitigation asks or drafting changes identified.

### 3.19 Land Negotiations

3.19.1 The Applicant has been consulting with the Joint Local Authorities since 2018 and has been in separate landowner negotiations since October 2022, and are currently in negotiations with both Surrey County Council and Reigate and Banstead Borough Council in relation to the acquisition of land and rights. Responses have been issued as part of the Written Representations and ExA Questions process in relation to the impact of the proposed compulsory acquisition of land and rights, including in relation to their development aspirations. The land areas that are currently being reviewed by the Applicant and these authorities are, Bayhorne Farm and Gatwick Dairy Farm for Surrey County Council (Plot numbers 1/009, 1/010, 1/013, 1/013A, 1/019, 1/024, 1/027, 1/031, 1/035, 1/038, 1/039, 1/042, 1/046, 1/047, 1/049, 1/053, 4/462, 4/468, 4/470, 4/495 ), and Riverside Garden Park and Church Meadow for Reigate and Banstead Borough Council (Plot numbers 1/004, 1/007, 1/007A, 1/008, 1/035, 1/036, 1/050, 1/053, 1/064, 1/069, 1/070, 1/071, 1/074, 1/093, 1/094, 1/095, 1/096, 1/138, 1/164, 1/165, 1/166, 1/193, 1/201).

3.19.2 **Surrey County Council as landowner (SCC):** Following extensive meetings on both Gatwick Dairy Farm and Bayhorne Farm, as well as emails and revisions of proposed draft Heads of Terms, the Applicant is currently reviewing information provided by SCC in relation to proposed highway works that SCC consider the Applicant is responsible for to mitigate the potential Horley Business Park development. A Land Issue Subset Statement of Common Ground is being drafted to identify the key areas of concern and any mitigation measures that need to be agreed as part of this draft DCO. The land subject to powers at Gatwick Dairy Farm has been discussed and a response to SCC's comments surrounding the land use, open space and timing of the land has been provided at Deadline 2.

3.19.3 **Reigate and Banstead Borough Council as landowner (RBBC):** The Applicant has made efforts to consult and agree a voluntary agreement for the land areas at Church Meadows and Riverside Garden Park, however, to date, there has been limited response from RBBC. The Applicant is confident that a voluntary agreement can be reached for the land acquisition and that it can be completed before the conclusion of the examination period.

### 3.20 Draft Development Consent Order

3.20.1 The following table sets out the Applicant's response to matters raised on the Draft DCO.

**Table 3.13: The Applicant's response to matters raised on the draft DCO**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>DCO1</b>	Requirement 2 Commencement A number of the operations excluded from the definition of commencement seem capable of giving rise to significant effects	C	Negative	The Applicant must provide reasons specific to each exception being suggested. Revisions required to Requirement 2 (1) Commencement	Advice note 15: Drafting Development Consent Orders. The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO	The Applicant refers to 2.7.1.2 of the <b>Statement of Common Ground Between Gatwick Airport Limited and Surrey County Council</b> [ <a href="#">REP1-045</a> ].  The Applicant reiterates that the approach of excepting certain construction activities from triggering "commencement" of the DCO is well precedented in made DCOs. The Councils' comments on the relevance of precedent are noted, but the Applicant considers that it is useful to bring this to the ExA's attention to demonstrate where drafting approaches are commonly deployed by promoters and accepted by the Secretary of State. The justification for excepting activities from "commencement" accompanies the references to precedent in paragraph 3.4.1 of the <b>Explanatory Memorandum to the Draft Development Consent Order</b> [ <a href="#">REP1-007</a> ] and is further detailed in the SoCG with Surrey County Council.
<b>DCO2</b> <b>(See also HE1)</b>	Requirement 14  SCC not identified as relevant discharging	C	Negative	Revisions required to Requirement 14 Archaeological remains –	Aligns with roles and responsibilities within Surrey	The Applicant has amended Requirement 14 in version 6.0 of the <b>draft Development Consent Order</b> (Doc Ref.2.1) submitted at Deadline 3 to clarify that Surrey County Council is the relevant

	authority within dDCO – inefficient discharging process			i.e. replace relevant planning authority with County Archaeologist at Surrey County Council		authority as regards archaeological remains in Surrey.
<b>DCO3</b>  <b>(see also NV6)</b>	Requirement 15  Air Noise Envelope	O	Negative	<p>There is no role for any local authority control in this Requirement and the Council considers there should be. (The same point applies to R.16 (air noise envelope) and R17 (verification of air noise monitoring equipment)).</p> <p>Similarly, It does not explain why the CAA is the appropriate body for discharging Requirements 15 to 17. The Council considers the EM should be amended to reflect these points.</p> <p>The JSCs can then better consider their position in respect of them these requirements.</p> <p>The JSCs notes R.15(4) requires the applicant to publish certain information on a website within 45 days of it being approved by the independent air noise reviewer. The JSCs seek confirmation as to why such a long deadline is included.</p> <p>Once approved, a document can be published on a website within seconds. (The same point applies to Rs. 16(6) and 17.</p>	<p>Advice note 15: Drafting Development Consent Orders (para 1.5). The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO.</p> <p>For instance, it does not provide the source of this provision (if any), the section of the Planning Act 2008 under which it is made, or why it is appropriate for the development of the project.</p>	<p>The CAA have expertise to consider the complex and technical subject matter of the Noise Envelope, the Annual Monitoring Forecasting Reports and the Noise Envelope Reviews. They are also a body which is independent from the Applicant. Given, it is quite clear why the CAA would be chosen to perform the Independent Reviewer role of scrutinising and verifying the noise envelope information submitted by the Applicant, to confirm whether the requirements of the Noise Envelope are being achieved and whether a review proposal is appropriate.</p> <p>The local authority will be able to consider the approved documents by the CAA, with the benefit of them having gone through an expert independent review process. Should they then wish to take issue with those, they are at liberty to do so, and where they consider appropriate to invoke the enforcement provisions with the Planning Act 2008.</p> <p>The 45 day period in R15(4) reflects the 42 day period within which to decide whether an appeal in respect of any document approved by the CAA would be pursued, and so 45 days has been picked to ensure documents are not published where they are to be appealed, and where that appeal process must first properly be followed. To do so could cause unnecessary confusion for communities, and that should be avoided.</p>

<p><b>DCO4</b>  (see also <b>NV5</b>)</p>	<p>Requirement 18 Noise insulation scheme</p>	<p>O</p>	<p>Negative</p>	<p>In the first instance, it would be helpful to know why each of the time limits set out in the requirement has been chosen. For instance, in R.18(1), why does the applicant have up to 3 months from commencement of Work Nos. 1 to 7 to submit noise insulation scheme details to the relevant planning authority? Why can't that be done (say) before commencement? The same point applies to the 6-month limit in R.18(2). The JSCs would expect these points to be explained or sign-posted in the EM.</p> <p>Again in R.18(2), the JSCs considers the requirement to use "appropriate steps" to notify residential properties to be imprecise and considers these "steps" should be described in the requirement. As well as being imprecise, absent the explanation, the requirement would be difficult to enforce. In its current form, the requirement does not appear to satisfy at least two of the six tests of conditions (i.e. enforceable and precise) as required by the Circular 11/95: Use of conditions in planning permission.</p>	<p>Circular 11/95: Use of conditions in planning permission.</p> <p>Airport NPS NPPF</p>	<p><b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> <a href="#">[REP2-031]</a> provides further information regarding how the Noise Insulation Scheme will be administered. Further details contained in the document will be captured in updates to the Noise Insulation Scheme document.</p> <p>The timescales within R18 have been included because they are considered to be reasonable, and ensure persons are notified suitably early so as to ensure insulation works can be undertaken across the Inner Zone before operations from the Northern Runway commence.</p> <p>The Applicant also does not agree that any part of R18 is imprecise or unenforceable. If the Applicant has not taken steps to notify all residential properties within the noise insulation scheme inner zone of their eligibility for the noise insulation scheme as a consequence of air noise within 6 months of the following the commencement of any of Work Nos. 1 – 7, they will be in breach of the Requirement. As confirmed in the update document, all properties will be contacted directly, and the scheme will be advertised on the Applicant's website. Specialist support will also be provided to occupiers where required.</p>
<p><b>DCO5</b>  (see also <b>NV7</b> and <b>NV9</b>)</p>	<p>Requirement 19 Airport Operations</p>	<p>O</p>	<p>Negative</p>	<p>R.19(2) would restrict dual runway operations to 386,000 commercial air transport movements per annum. The Council considers a control on total air transport movements per annum would be appropriate and considers a total of</p>	<p>Airport NPS NPPF</p>	<p>In respect of the comment on what is now Requirement 19(1) (previously numbered 19(2)), the Applicant refers to its response to Action Point 1 in <b>The Applicant's Response to Actions from Issue Specific Hearing 2: Control Documents / DCO</b> <a href="#">[REP1-063]</a>, which explains the definition of "commercial air transport movements" and why it would be</p>

				<p>no more than 389,000 would be reasonable.</p> <p>R.19(3) allows the use of the northern runway between the hours of 23:00 - 06:00 when the southern runway is not available for use “for any reason”. The Council considers “for any reason” to be too broad and considers the use of the northern runway between these times should only be used when the southern runway is not available because of planned maintenance and engineering works.</p> <p>Requirement is also needed to restrict use of the northern runway to departures.</p> <p>Requirement is needed to include a night movement cap - current DfT night noise movement cap in core night period (23:30 – 06:00) of 11,200 movements over the 218 day summer period and 3,250 movements in the winter period not to be exceeded.</p>		<p>inappropriate to impose a hard limit on flights that do not fall within this definition, which are urgent and largely unplanned in nature.</p> <p>In respect of the comment on what is now Requirement 19(2) (previously numbered 19(3)), the Applicant refers to its response to East Sussex County Council with ref. N1 above.</p> <p>In respect of a new requirement to restrict the use of the Northern Runway, the Applicant refers to its response to DCO.1.40 in <b>The Applicant’s Response to ExQ1</b> (Doc Ref. 10.16).</p> <p>In respect of a new requirement to include a night movement cap, as noted above the DfT regulates night movements in the core night period. It is not considered necessary or appropriate for the DCO to replicate this regime.</p> <p>Further information on the DfT night flight regime can be found at paragraphs 3.1.16 onwards of 10.8.3 <b>Written Summary of Oral Submissions from Issue Specific Hearing 2: Control Documents / DCO</b> [<a href="#">REP1-057</a>].</p>
<b>DCO6</b>  <b>(See also RE1)</b>	Requirement 22  SCC not identified as relevant discharging authority within dDCO – inefficient discharging process	C	Negative	Revisions required to Requirement 22 Public Rights of Way so that responsibility for the discharge of this Requirement relating to the Public Rights of Way Implementation Plan should sit with SCC within Surrey	Aligns with roles and responsibilities within Surrey	The Applicant refers to its response to RE1 above. Requirement 22 was amended at Deadline 1 to address this point.

				Closure notices should also be received by SCC		
<b>DCO7</b>	Article 10 Concerns around disapplication of sections of the 1991 Act	C	Negative	SCC wish to understand why section 77 of the 1991 Act is being disappplied.	Advice note 15: Drafting Development Consent Orders. The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO	<p>Section 77 of the 1991 Act provides that, where a highway is used as an alternative route to a highway that is restricted or prohibited due to street works, the undertaker must indemnify the highway authority of the highway used as a diversion in respect of costs of strengthening that highway or making good any damage caused by the diverted traffic.</p> <p>It is appropriate to disapply this provision in a DCO context because the impacts of the Project, including as regards traffic, have been subject to a full EIA and, where impacts have been identified, appropriate mitigation has been incorporated into the Project's design or otherwise secured. Section 77 of the 1991 Act would cut across this mitigation package.</p> <p>The disapplication of section 77 of the 1991 Act is precedented in Article 15 of the Sizewell C (Nuclear Generating Station) Order 2022.</p>
<b>DCO8</b>	Article 11 concern at lack of detail	C	Negative	Owing to the small number of streets affected within the Order limits, it would seem straightforward to cross- refer in the article to a specified list. The Applicant will be aware that such an approach is not unusual. Absent such cross-reference, the Council maintains its position that the power should be subject to street authority control.	Advice note 15: Drafting Development Consent Orders. The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO	<p>The Applicant does not consider it necessary for Article 11 to reference a schedule setting out a list of streets. There are a small number of streets within the Order Limits and, due to the nature of this Project's site, the vast majority are either airport roads or are the subject of the surface access works comprised in the authorised development. Through the examination and by reference to plans including the <b>Land Plans [AS-015]</b>, stakeholders are able to ascertain the extent of the Order limits and therefore the extent of streets over which the Article 11 power may be exercised. The Applicant is not aware of concerns regarding the exercise of Article 11 over</p>

						<p>specific streets. In that context, preparing and referencing a schedule of all streets within the Order limits would mean that Article 11 has the same effect as presently.</p> <p>It is noted that the form of wording adopted in Article 11 is preceded in several recent roads DCOs but also in Article 11 of the Thurrock Flexible Generation Plant Development Consent Order 2022. Such wording is also present in the final draft for the London Luton Airport Expansion Development Consent Order, the examination of which has concluded.</p>
<b>DCO9</b>	Article 14	C	Negative	<p>The extension of deadline from 28 to 56 days is welcomed, however, the Council maintains its in-principle objection to the deeming provision.</p>		<p>The Applicant reiterates its previous remarks regarding deeming provisions. A failure to respond to requests for consent/approval in a timely manner can lead to significant delays in a construction timetable. Use of deeming provisions in respect of some key consents is therefore considered reasonable and in alignment with the objectives of the Planning Act 2008 to ensure efficient delivery of nationally significant infrastructure projects.</p> <p>As the Councils note, the time period after which consent is deemed given has been extended to 56 days in response to the Councils' previous comments. Further revisions have been made to the deeming provisions in version 6.0 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) submitted at Deadline 3 to reflect proposed drafting by Crawley Borough Council.</p>
<b>DCO10</b> <b>(See also W1)</b>	Article 22 Lack of Protective Provisions for drainage	C	Negative	<p>Regarding ordinary watercourses, the council considers the provision of the drainage protective provisions secured on behalf of SCC in Part 4 of Schedule 9 to the M25 junction 10/A3 Wisley</p>	<p>SCC LLFA responsibilities under Land Drainage Act 1991</p>	<p>Please see the Applicant's response to W1 above.</p>

	authorities - Impact on SCC carrying out statutory duties.			interchange Development Consent Order 2022 (SI 2022/548) would be an appropriate starting point.		
<b>DC11</b> <b>(See also W4)</b>	Schedule 1 and 2 Impact on SCC carrying out statutory duties	C	Negative	Revisions required to schedule 1 and 2 of dDCO for accuracy purposes. For example foul water drainage is not reviewed by the LLFA	SCC LLFA responsibilities under Land Drainage Act 1991	<p>It is unclear precisely what revisions are proposed and the Councils are invited to specify proposed amendments where their concerns have not been addressed by revisions at Deadline 1 and responses in this document.</p> <p>As regards Requirement 10 (surface and foul water drainage, this was amended at Deadline 1 to provide as follows:</p> <p><i>"No part of the authorised development (except for the highway works and excepted development) is to commence until written details of the surface and foul water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by CBC (in consultation with West Sussex County Council, the Environment Agency and Thames Water Utilities Limited)."</i></p> <p>The Applicant welcomes any further suggestions from the Councils on the appropriate discharging authorities for this requirement and for Requirement 11 (local highway surface water drainage).</p>
<b>DCO12</b>	Article 31  Extended time periods for acquisition of land	C		The JSCs consider the power to acquire land or interests in land should be exercisable for 5, and not 10, years. It should run from the date the order comes into force, rather than the "start date".	Advice note 15: Drafting Development Consent Orders.	The Applicant refers to its response to DCO.1.29 in <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16).
<b>DCO13</b>	Article 40	C and O	Negative	Ordinarily, the JSCs would expect the order to provide for the acquisition of existing open space land only once a	(The Infrastructure Planning (Model Provisions) (England	The Applicant refers to its response to LV15 in Section 3.6 above.



<p>(See also LV15 and RE4)</p>	<p>Insufficient certainty in relation to the delivery of replacement open space</p>			<p>scheme has for the provision of the open space land has been implemented to the local planning authority's satisfaction.</p> <p>Revisions required to article 40</p>	<p>and Wales) Order 2009)</p>	
<p>DCO14</p>	<p>Inconsistencies and queries relating to Plans and Schedules</p>	<p>C</p>	<p>Potentially negative</p>	<p>Revisions required to Plans and Schedules as required</p>	<p>N/A</p>	<p>In response to Paragraph 21.2: The extent of shaded areas for new/improved highways, new/improved private means of access and new/improved footways/shared-use cycle tracks and segregated cycle tracks are based on the proposed carriageway widths over which the right of way is to be granted. Features such as roundabout central islands are not included. [Note: This approach is consistent with the approach adopted for the Rights of Way and Access Plans on other DCOs which have recently been granted (e.g. A417 Missing Link and A428 Black Cat to Caxton Gibbet Improvements schemes)]. Highway authority highway boundaries are to be defined separately after the DCO has been granted as part of the development of the detailed design for the scheme. All areas within the final highway authority boundary (including roundabout central islands, highway embankments and drainage infrastructure) will fall under the responsibility of the relevant highway authority. In Response to Paragraph 21.3 Bullet 1: The extent of d1 will be amended in the Rights of Way and Access Plans at Deadline 3 to be coincident with the existing access track connection onto Peeks Brook Lane up to the junction with Peeks Brook Lane. The draft DCO will be amended at Deadline 3 to reflect the updated length of d1 and to correct the typo in</p>

					<p>the spelling of “Peeks Brook Lane”, which is the correct street name.</p> <p>In Response to Paragraph 21.3 Bullet 2: The commencement point of the existing private means of access to the Holiday Inn property is being relocated further west to accommodate the proposed widening of the A217 carriageway at this location. The purple shaded area labelled D5 is the short section of the Holiday Inn Private Means of Access that is to be stopped up and replaced with the A217 highway designation labelled a28. The A217 carriageway needs to be widened at this location to accommodate the increased footprint of Longbridge Roundabout and the associated active travel infrastructure.</p> <p>In Response to Paragraph 21.3 Bullet 3: This has been checked against available orthophotography and is confirmed that the proposed cycle track connects to the existing path within the park on the SCC side of the border.</p> <p>In Response to Paragraph 21.3 Bullet 4: The extents of the red line boundary on the A217 are based on potential requirements to undertake works such as utility diversions and drainage infrastructure modifications (as well as associated carriageway re-surfacing post trench works) up to approx.. 40m beyond the proposed tie in point of the realignment of the A217 carriageway. The final details of the design proposals at this location will be confirmed at the detailed design stage in consultation with the local highway authority in accordance with the process set out in the Clause 5 of Schedule 2 Requirements of the <b>draft Development Consent Order</b> (Doc Ref.2.1)</p> <p>In Response to Paragraph 21.4:</p>
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					<p>This issue has already been resolved as shown in the <b>Traffic Regulation Plans – Classification of Roads</b> <a href="#">[AS-018]</a>.</p> <p>In Response to Paragraph 21.5: No road realignment works or TRO modifications are proposed beyond point 43a and for this reason point 43a is not coincident with the edge of the red line boundary. The red line boundary extends further up A217 at this location on the basis of potential requirements for utility diversions works and/or drainage infrastructure modifications at this location.</p> <p>In Response to Paragraph 21.6: Parking restriction information has recently been updated on the SCC parking restrictions web portal. The <b>Traffic Regulation Plans – Clearways and Prohibitions</b> <a href="#">[APP-025]</a> and associated <b>draft Development Consent Order</b> (Doc Ref.2.1) schedule (Schedule 6 Part 2) will be updated at Deadline 3 to reflect the latest information available for relevant SCC roads. The existing parking restrictions on impacted SCC roads are proposed to be reinstated to reflect the modified carriageway kerb lines.</p> <p>In Response to Paragraph 21.7: The extent of active travel path modifications that form part of the NRP proposals are confirmed in the Rights of Way and Access Plans. At the termination point of the proposed works the active travel provisions tie into the existing infrastructure. At most locations existing active travel infrastructure is captured in the background OS mapping. One of the exceptions to this is much of the existing path network through Riverside Garden Park, which is not captured fully by OS mapping. The proposed shared use path labelled c15 has been confirmed to tie into</p>
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						the existing Riverside Garden Park path network at its termination point using orthophotography. Additional labels have been added to the background mapping to indicate the location of existing footways and shared-use paths in the Surface Access Highways Active Travel Plans included in Appendix A of <b>The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065]</b> .
<b>DCO15</b> <b>(See also TT5)</b>	Lack of incorporation of Permit Scheme and Lane Rental Scheme Coordination of activities through the incorporation of the schemes is intended to be of benefit to the Applicant as a means of achieving positive and constructive collaborative working.	C	Negative	SCC requires that Lane Rental Scheme and Permit Scheme are incorporated into DCO.  Within Surrey the Southampton to London Pipeline Project DCO, as made 7th October 2020, includes the Permit Scheme. It has proved invaluable during delivery for both parties.	SCC Lane Rental Scheme SCC Permit Scheme	The Applicant refers to its response to TT5 above.
<b>agDCO16</b>	Article 48 there are exemptions proposed from large parts section 79(1) of the Environmental Protection Act 1990 in relation to nuisance.  Given the airport's operation to date has occurred under this legislation the council sees no reason why the Applicant should be able to exempt itself.  The Sizewell C DCO is quoted as precedent in the Explanatory Memorandum. In the Sizewell order	C and O	Negative	Changes sought in relation to Article 48 in Draft DCO, to allow residents to bring nuisance action in relation to odour as they can do at present.  The Applicant must clarify why such an exemption is needed - especially during the operational phase  There is no explanation as to why the Applicant need to go beyond the Sizewell 'precedent', nor indeed why they need these exemptions / greater powers in the first place,	(The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009)  The council notes that in the model provisions (The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009) the only	The Applicant refers to its response to DCO.1.37 in <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16).

	<p>exemptions were sought for (lettering as per EPA 1990 section 79(1):</p> <p>(d) any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance;</p> <p>(fb) artificial light emitted from premises so as to be prejudicial to health or a nuisance;</p> <p>(g) noise emitted from premises so as to be prejudicial to health or a nuisance;</p> <p>(ga) noise that is prejudicial to health or a nuisance and is emitted from or caused by a vehicle, machinery or equipment in a street</p> <p>Here exemptions are also sought from</p> <p>(c) fumes or gases emitted from premises so as to be prejudicial to health or a nuisance;</p>			<p>If article 48 is not struck out in its entirety the JSCs would want article 48(1)(b) to be amended as follows – changes in italics:</p> <p>b) is a consequence of the construction, maintenance or operation of the authorised development and that it cannot, to the reasonable satisfaction of the local authority reasonably be avoided.</p> <p>Regarding article 48 (defence to statutory nuisance), article 48(1) is too wide-ranging in its application to nuisances falling within section 79(1) of the Environmental Protection Act 1990. The Council considers it should apply, like Model Provision 7, to section 79(1)(g) only.</p>	<p>exemption was for:</p> <p>(g) noise emitted from premises so as to be prejudicial to health or a nuisance;</p>	
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	<p>(e) any accumulation or deposit which is prejudicial to health or a nuisance;</p> <p>(h) any other matter declared by any enactment to be a statutory nuisance;</p>					
<b>DCO19</b>	<p>Schedule 11 Financial impact on local authorities for ongoing activities relating to discharging of conditions and other consents</p>			<p>The JSCs notes paragraph 3 (fees) is to be populated and looks forward to discussing the most appropriate way forward regarding fees. On a drafting point, the JSCs the provision should go beyond the payment of a fee in respect of “any for agreement, endorsement or approval in respect of a requirement” and should also apply to the payment of a fee in respect of the granting of any consent in respect of the Order. It will be remembered that several articles require the consent of the street authority (e.g. articles 12(3) and 14(4)), the traffic authority (e.g. article 18(5)(c)) and the highway authority (article 24(4)) and the cost associated with administering this work should also be covered by the Applicant.</p>		<p>The Applicant refers to its response to DCO.1.7 in <b>The Applicant’s Response to ExQ1</b> (Doc Ref. 10.16) and the new drafting included in version 6.0 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) submitted at Deadline 3.</p>

#### 4 Joint West Sussex Councils

##### 4.1 Overview

4.1.1 This section sets out the Applicant’s response to the points raised within the Local Impact Report [REP1-068] and appendices submitted by the Joint West Sussex Councils which comprise of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex District Council. The Applicant has retained the headings and structure of the Local Impact Report below. The Applicant has retained the headings and structure of the Local Impact Report below.

##### 4.2 Planning Policy

4.2.1 A series of **Local Policy Compliance Tables** (Doc Ref. 7.1) have been prepared in response to local policies of relevance to the Project and referenced in the **Joint West Sussex Councils Local Impact Report** [REP1-068] and are submitted at Deadline 3. **Annex A** of the Local Policy Compliance Tables relates to Crawley Borough Council’s local planning policies, **Annex C** relates to Horsham District Council and **Annex E** is applicable to Mid Sussex District Council.

##### 4.3 Principle of Development

4.3.1 The Applicant has provided a response to Principle of Development at **Appendix A – Note on the Principle of Development** (Doc Ref. 10.15) and at **Appendix B – Response to the West Sussex Authorities Appendix F – Needs Case** (Doc Ref. 10.15)

##### 4.4 Draft Development Consent Order

4.4.1 The Joint West Sussex Councils have provided comments on the Draft DCO at Appendix M to their Local Impact Report [REP1-069]. The Applicant has provided its response to these comments at **Appendix C – Response to DCO Drafting Comments from the West Sussex Authorities** (Doc Ref. 10.15).

##### 4.5 Historic Environment

4.5.1 The following table sets out the Applicant’s response to matters raised on Historic Environment.

**Table 4.1: The Applicant’s response to matters raised on historic environment**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
7.1A	Archaeology - Potential for disturbance and impact on archaeological remains	C	Negative	Change: Further archaeological evaluation and the justification provided for exclusion of areas from further work by the Applicant.  Further evaluation, mitigation by excavation, monitoring or preservation in situ of identified archaeological remains. Identification of an outreach programme promoting the history and archaeology of the airport and results of the fieldwork should also be included. These	ANPS –Para 5.187  NNNPS NPPF - Chapter 16  CBLP- Policy CH12  mCBLP - Policies	A report regarding the history of the airport and the likely impacts of airport development on buried archaeological remains is being prepared and will be shared with the relevant archaeological advisors to the Joint West Sussex Councils. Any subsequent amendments to <b>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording – West Sussex</b> [APP-106] will be included within a further version of that document, as last updated at Deadline 2 to reflect <b>Notification of Proposed Project Changes</b> [AS-113], Scheme Change

				<p>should be secured by an overarching WSI within the DCO.</p> <p>The WSI should include the potential for the provision of site-specific WSIs (SSWSI) for further element of the mitigation to be produced post consent.</p> <p>The WSI should also commit to suitable resourcing for the Council’s archaeological advisors to monitor, assess and approve SSWSI, mitigation measures, post-investigation reports, publication and updates to the West Sussex Historic Environment Record. The WSI should also explain how such a commitment would be secured.</p>	GAT1*,HA1 and HA7	<p>3. We will review the proposed changes to enlarge the excavation areas at Museum Field and at Brook Farm (WSI Area H) and will confirm for Deadline 4. Additionally, the report documenting the history of the airport sets out information regarding past ground disturbance. Once that report has been provided and a meeting to discuss held with the appropriate advisors to the LPAs Place Services, the final position will be consolidated in the finalised WSI.</p>
7.1B	Impact on setting of Charlwood House	C and O	Negative	<p>Change: Retention /supplemental planting of trees along southern boundary of Car Park X. Further design detail.</p>	ANPS – Para 5.193 - 5.195	<p>The impact of the construction and operation of the proposed decked section within the eastern section of Car Park X on the Grade II* listed Charlwood House as a result of the change within its setting is assessed within paragraph 7.9.40 of <b>ES Chapter 7: Historic Environment</b> [APP-032] and in <b>Code of Construction Practice – Annex 6 – Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3). The assessment includes consideration of the impact of any operational lighting and takes account of the effectiveness of the existing mature vegetation along each side of Charlwood Road; it concludes that there would be no change to the significance of the Grade II* listed Charlwood House.</p> <p>The primary consultee regarding Grade II* listed buildings is Historic England. No concerns have been raised by Historic England in respect of the Grade II* listed Charlwood House. Row 2.12.3.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and Historic England</b> [REP1-035] sets out the position</p>



						<p>of Historic England thus ‘<i>At this stage in the process, we feel we have sufficient information before us to assess the impacts, or to judge whether any proposed mitigation is likely to be adequate. We have been encouraged by the careful and considered approach that has been taken by the project team to carry out heritage impact assessments to inform the scheme design and to seek mitigation wherever possible</i>’.</p> <p>A new <b>Design Principle</b> (Doc Ref. 7.3) for Car Park X is set out in the Design Principles DBF9 “<i>In order to limit visibility to Charlwood House, the design of Car Park X (Work No. 31) will:</i></p> <ul style="list-style-type: none"> <li>- <i>Locate the decked parking provision in the eastern portion of the Works Area.</i></li> <li>- <i>Limit tree and hedgerow removal where possible, other than as required to widen the vehicular entrance to Car Park X;</i></li> <li>- <i>Provide re-planting provisions along the southern boundary to further screen views.”</i></li> </ul>
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#### 4.6 Landscape, Townscape and Visual Resources

4.6.1 The following table sets out the Applicant’s response to matters raised on Landscape, Townscape and Recreation.

**Table 4.2: The Applicant’s response to matters raised on landscape, townscape and visual resources**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
8.1A	Visual impact of construction compounds	C	Negative	Change : Change: ZTVs for these areas to inform mitigation. Details on tree loss, design and layout of this area including lighting and stockpiles. CoCP (Annex 3).	CBLP Policy CH9 requires the rural fringe to be protected and safeguarded from	At this stage of the design of the Project a specific design for any particular construction compound has not been assessed, but rather a reasonable worst case has been used based on the activities which will be undertaken within the compound. <b>ES Appendix 5.3.2: Code of</b>

				<p>Requirement: Details on layout and appearance of each compounds to be agreed with relevant Authorities.</p>	<p>proposals which result in noise and visual intrusion, while policy GAT1 seeks to ensure satisfactory safeguards to mitigate visual impacts.</p> <p>mCBLP – Policies CL8, GAT1 and EP6</p>	<p><b>Construction Practice (CoCP) [REP1-021]</b> and <b>ES Appendix 5.3.1: Buildability Report [APP-079, APP-080, APP-081]</b> set out the general nature of compounds and their key elements although do not contain detailed layouts of infrastructure at this stage. The CoCP describes how the Applicant will manage and minimise disturbance and other environmental impacts from construction activities required to deliver the Project whilst meeting the requirements of relevant legislation, codes of practice and standards.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice (CoCP) [REP1-021]</b> Section 4: General Requirements (para 4.4.3, 4.4.4, 4.5.5 and Table 4.1: Maximum Height of Temporary Construction Compounds and 4.9 Construction Lighting) and Section 5: Management of Environmental Effects (para. 5.3.1 to 5.3.6) set out typical measures to minimise impacts on landscape and visual resources. These would include the appropriate positioning of infrastructure within the compound, appropriate types, locations and operation of lighting and the type/height of boundary treatments including security fences and screens. The establishment of site construction compounds would be carried out in accordance with the Code of Construction Practice pursuant to Requirement 7, Schedule 2 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p>
8.1B	Lack of control over landform / visual appearance of Pentagon Field	C	Negative	<p>Change: OLEMP / Addition to CoCP Annex 3 – additional details required on visual impact and management of the works on site and in relation to nearby footpaths and ancient woodland. Further information needed on site levels and parameter plan:</p> <p>Requirement: additional details need in control documents.</p>	<p>CBLP CH9 policy requirements the rural fringe to be protected and safeguarded from proposals which result in noise and visual intrusion, while policy GAT1</p>	<p><b>ES Appendix 5.3.2: Code of Construction Practice (CoCP) Annex 4 Soil Management Strategy [APP-086]</b> sets out general methodologies based on recognised best practice guidance in the Defra Code of Practice for the Sustainable Use of Soils on Construction Sites (CoCP para. 1.1.3). At para. 6.1.5 it explains that topsoil is to be stored up to 3m high and subsoil to be stored up to 5m high. Para. 6.6.1 explains that any soil which is to be stored for more than three months would be seeded with a grass and flora seed mix and managed to control</p>

					<p>seeks to ensure satisfactory safeguards to mitigate visual impacts. CH6 – tree replacements, CH11 seeks to safeguard PRow.</p> <p>mCBLP policies CH8, OSC3, GAT1, DD4.</p>	<p>weeds. This would also prevent erosion and minimise the effects of the temporary features on landscape character and visual amenity. Para 6.1.2 states that ‘The locations of storage areas would be planned within the detailed Soil Management Plans’ and that they would be ‘developed for each individual work area and approved by the relevant LPA’. This detail would include the specific location, size and shape of soil storage areas.</p> <p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [REP2-021 to REP2-027] sets the overarching vision for the Project. The report defines the various landscape proposals including the spoil deposition area of Pentagon Field, as a sketch landscape concept at Figure 1.2.18, that will have grassland reinstated for grazing of livestock. Landscape design objectives for Pentagon Field in Zone 8 are included at Section 3.9 and Landscape Proposals for the zone are included at Section 4.9 of the oLEMP. Blocks and belts of native woodland should be established along the boundary of Balcombe Road to mitigate impact of tree loss generally within the Project, extend existing woodland, create ecological connectivity and a visual screen and buffer at the airport perimeter.</p> <p>Before work can commence on any part of the Project a landscape and ecology management plan (LEMP) for that part must be submitted to and approved by the local planning authority. Those LEMPs must be substantially in accordance with the oLEMP under Requirement 8 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p>Earth shaping is illustrated in photomontages (See <b>ES Landscape, Townscape and Visual Resources Figures - Part 2</b> [REP2-007], Figures 8.9.33 to 8.9.40) and assessed during construction and when operational within the LTVIA at <b>ES Chapter 8: Landscape,</b></p>
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						<b>Townscape and Visual Resources</b> [ <a href="#">APP-033</a> ], sections 8.9. and 8.11.
<b>8.1C</b>	Increased visual impact from tree loss (car parks)	O (and C)	Negative	Change: OLEMP, Parameter Plans, DAS. Provide tree survey plans and tree protection plans to give clarity the level of landscaping is to be retained for Purple Parking, Car Park X, North Terminal Long Stay Decked Car Park. Consider opportunities for the reinforcement of screening of mitigation Requirement: Tree retention measures for sites agreed. Tree mitigation in accordance with policy CH6.	<p>CBLP policy CH6 sets out the adopted tree replacement standards, policy CH9 requires the rural fringe to be protected and safeguarded from proposals which result in noise and visual intrusion.</p> <p>Policies GAT and CH3</p> <p>mCBLP DD4, CL8, GAT1*, DD1, EP6</p>	<p>Tree survey plans, tree quality schedules, preliminary tree removal plans and impact assessment for the Project site are included in <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [<a href="#">REP1-026</a>, <a href="#">REP1-027</a>, <a href="#">REP1-028</a>, <a href="#">REP1-029</a>, <a href="#">REP1-030</a>]. <b>ES Appendix 5.3.2 Code of Construction Practice</b> [<a href="#">REP1-021</a>] sets out general methodologies and mitigation measures and <b>Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) which includes Tree Removal and Protection Plans for the surface access proposals including location and standard specification of tree protection fences. These drawings will be revisited and refined during the detailed design process and submitted for approval as part of the detailed Arboricultural Method Statement. <b>Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) has been prepared to include retention and removal of general vegetation within the Project, in addition to trees and woody vegetation, submitted at Deadline 3.</p> <p><b>ES Appendix 8.8.1: Outline Landscape and Ecology management Plan</b> [REP2-021 to REP2-027] sets the overarching vision for the Project and tree survey and protection methods required to achieve this.. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the principles in the outline LEMP under DCO Requirement 8.</p> <p>The completion of tree surveys and the preparation of Preliminary Tree Removal Plans demonstrates that tree protection measures and root protection areas can be accommodated within tree removal areas to minimise</p>

					<p>harm to trees during construction periods within the application site. <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> assesses a reasonable worst case scenario for tree and vegetation removal based on the land required for construction activities.</p> <p>The Applicant undertook a tree survey of land within the vicinity of the surface access improvements for the ES which is included in <b>ES Appendix 8.8.1: Outline Landscape and Ecology management Plan [REP2-021 to REP2-027]</b> to enable the likely area of greatest vegetation loss as a result of the Project to be identified. The Applicant has undertaken further surveys included in <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment [REP1-026 to REP1-030]</b>. Any construction activities must be carried out in accordance with the CoCP (Doc Ref. Appendix 5.3.2) under DCO Requirement 7. The CoCP includes a number of construction management measures for the protection of trees and vegetation during construction. <b>Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) (oAVMS) (Annex 6 to the CoCP) includes further protection measures and Preliminary Tree Removal and Protection Plans. Preliminary Vegetation Removal and Protection Plans will be submitted at Deadline 4. Area-specific Detailed Arboricultural and Vegetation Method Statements including Detailed Vegetation Removal and Protection Plans and, where required, Detailed Tree Removal and Protection Plans must be submitted to and approved by CBC (following consultation with MVDC and RBBC as appropriate) prior to the removal of any trees or vegetation in that area. The AVMS and associated plans must be substantially in accordance with the oAVMS and associated plans.</p>
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<b>8.1D</b>	Increased visual impact from highway works	C and O	Negative	<p>Further information provided on visual impact of this infrastructure</p> <p>given the extensive tree loss identified through the OLEMP.</p> <p>Requirement: Further detail required in OLEMP to enable identification of suitable environmental mitigation taking into account policy CH6 in respect of tree replacement. See also table impact highlighted table 9.1.AF.</p>	<p>CBLP policyCH9 requires rural areas to be protected from noise and visual intrusion and CL6 sets out the tree mitigation and replacement standards, CH3 sets out normal requirements for all development.</p> <p>mCBLP policies CL8, GAT1*, EP6, DD4</p>	<p>See 8.1C above, in addition;</p> <p>Tree surveys are included in <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [<a href="#">REP1-026</a>, <a href="#">REP1-027</a>, <a href="#">REP1-028</a>, <a href="#">REP1-029</a>, <a href="#">REP1-030</a>].</p> <p>A more detailed assessment of the number and size of existing trees within Crawley BC within the application site is contained as an <b>Appendix to the AIA report</b> (Doc Ref. 5.3) submitted at Deadline 3.</p> <p>The opportunity to replant the A23/M23 Spur road corridor following tree removal associated with the surface access improvements is constrained by guidance within National Highways i.e. DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13.</p> <p>Tree and vegetation removal and protection measures are shown and set out in the CoCP and <b>Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) and associated plans. These are all secured by DCO Requirement 7. Furthermore, the oLEMP secures provisions for retained vegetation and trees to be incorporated into the detailed landscape designs; this is secured by DCO Requirement 8.</p>
<b>8.1E</b>	Visual impact of the CARE facility and larger scale buildings	O	Negative	<p>Change – Further information is required through securing more robust design principles through the DAS.</p> <p>Requirement – Detailed design principles need to be agreed for these key buildings through control documents such as the DAS. See also table 24.1A and 24.1B for further detail.</p>	<p>CBLP policy CH8 seeks to protect longer distance views, while CH9 requires rural areas to be protected from noise and visual intrusion, policy CH3 requires</p>	<p>The local authorities are asked to clarify if the comment on the CARE facility takes account of the accepted Project Changes, which has reduced the maximum height of the replacement CARE facility.</p> <p>Notwithstanding this, visualisations included in <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] as photomontage/photo wirelines (ES Chapter 8 Figures 8.9.1 to 8.9.128) and updated to accommodate changes to the CARE facility design , <b>ES</b></p>

					<p>high quality development sympathetic to its surroundings.</p> <p>mCBLP policies CL7, CL8, DD1, GAT1* and EP6</p>	<p><b>Landscapae, Townscape and Visual Resources Figures</b> [REP2-006, REP2-007, REP2-008] are to Type 3 of the Landscape Institute, Visual Representation of Development Proposals: Technical Guidance Note 06/19. The methodology for the preparation of visualisations is in Appendix 8.4.1. Maximum parameters are modelled accurately. The visualisations show maximum parameters of the proposed development as simple wireline boxes, which is appropriate for the inclusion within a DCO. A <b>Design and Access Statement</b> [REP2-032, REP2-033, REP2-034, REP2-035, REP2-036] has been prepared to provide design quality control.</p> <p>The assessment of effect is described in Section 8.9. and 8.11 of <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] and includes sensitivity, magnitude of impact and level of effects for each visual receptor during day and night and summer and winter.</p> <p>Detailed built form design principles are included in the suite of design principles, within <b>Appendix 1 of the Design and Access Statement</b> (Doc Ref. 7.3), namely DBF1 to DBF30. This includes Design Principles DBF25 and DBF26 that are specific to the detailed design of the replacement CARE facility. We would welcome further clarity from the Local Authorities on what further information that are seeking to be secured through the design principles, noting that 24.1A and 24.1B does not provide further detail. It would also be helpful if the Local Authorities could confirm which buildings they deem to be 'larger scale buildings'.</p>
8.1F	Noise from increased overflight across AONB, loss of tranquillity	O	Negative	Maintain the use of WIZAD as tactical offload route only.	<p>NPPF Paragraph 182</p> <p>Mid Sussex Local Plan (2018)</p>	<p><b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [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</p>

					<p>DP16: High Weald AONB</p> <p>High Weald AONB Management Plan (2019)</p>	<p>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). 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.</p> <p>The UK Aeronautical Information Publication (AIP) sets out the rules for how the WIZAD route may be used and is the source for the information as it is published and available to pilots.</p> <p>The UK AIP explains that the WIZAD Standard Instrument Departure (SID) is a tactical routing allocated by air traffic control to alleviate airspace congestion and may be offered at a late stage of taxiing to aircraft normally allocated MIMFO (Route 4) SID between 0700 and 2300. The WIZAD SID should not be used for flight planning purposes.</p> <p>Under the baseline and the development, 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> <p>The increase in the number of overflights in 2032 compared to 2019, including aircraft using Route 9/WIZAD, is illustrated in Figure 8.6.6 of <b>ES Landscapae, Townscapae and Visual Resources Figures – Part 2</b> [REP2-007].</p>
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#### 4.7 Ecology, Nature Conservation and Arboriculture

4.7.1 The following table sets out the Applicant's response to matters raised on Ecology, Nature Conservation and Arboriculture.



**Table 4.3: The Applicant's response to matters raised on ecology, nature conservation and arboriculture**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>Ecology</b>						
<b>9.1A</b>	Permanent loss of semi-natural broadleaved woodland, scattered trees and semi-improved grassland within the River Mole Biodiversity Opportunity Area (BOA) as a result of highway works to North Terminal roundabout and Longbridge roundabout.	C / O	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the Design and Access Statement (DAS) (APP-253-257) need to be strengthened to reflect this.</p> <p>Compensate: Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP (APP-113-116), including clearer distinction between retained and new woodland.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p> <p>Compensate/Enhance: Funding of Project Officer and grant scheme to support a local landscape and biodiversity enhancement initiative through a S106 Agreement.</p> <p>Monitor: Funding for a joint local authority landscape and biodiversity Compliance Officer for the duration of the construction and aftercare periods through a S106 Agreement.</p>	National Networks NPS (para. 5.32)	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.</p> <p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the outline LEMP and BNG Statement. The Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.</p>
<b>9.1B</b>	Permanent loss of a narrow strip of broadleaved plantation woodland to highway works within Gatwick Woods BOA	C/O	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p>	National Networks NPS (para. 5.32).	See response to 9.1A above.

<b>9.1C</b>	Potential impacts to ancient woodland including Horleyland Wood LWS and Brockley Wood	C	Negative	<p>Avoid: Detailed design must seek to minimise ecological impacts. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Avoid: Stronger measures are required within the CoCP to ensure no construction activity is undertaken within ancient woodlands, and their minimum 15m buffer zone, including the need for a revised tree protection plan.</p>	Airports NPS (para. 5.103 and 5.105).	<p>No areas of Ancient Woodland are present within the Project site. As such, the Applicant has no powers to do any works within these areas.</p> <p>The potential for effects to Ancient Woodland was considered in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034]. This included from both direct and indirect impacts. The conclusion of this assessment was that there would be no significant effect on any area of Ancient Woodland from Project activities. The requirement to protect such habitats is described in Table 9.8.1 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034] and Section 5.4 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> [REP1-021] in respect of construction activities. This includes the provision of a 15m buffer to all areas of Ancient Woodland.</p> <p>The Applicant has undertaken further surveys included in <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [REP1-026, REP1-027, REP1-028, REP1-029, REP1-030] The document provides outline plans for tree retention and trees likely to be removed based on preliminary designs. The report identifies root protection zones which inform protective measures during development.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> [REP1-021] Annex 6 includes an <b>Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) which identifies measures to protect root protection zones. The measures along with Detailed Tree Removal and Protection Plans, specifying the trees to be retained, will be contained as part of the Detailed Arboricultural and Vegetation Method Statements for approval by the relevant planning authority prior to the relevant construction works commencing, as set out in the <b>ES Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3).</p>
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						Design Principle L4 has been amended to require habitats (including trees, scrub and hedgerows) of ecological value to be retained where possible, in order to minimise ecological impacts, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3. A new project-wide design principle (L10) has also been added to ensure the provision of a 15m protection buffer zone around areas of Ancient Woodland next to the Project site, noting above that no areas of Ancient Woodland are within the site boundary.
<b>9.1D</b>	Permanent loss of semi-natural broadleaved woodland and mature broadleaved trees associated with highway and other works	C/O	Negative	<p><b>Reduce:</b> Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p><b>Compensate:</b> Secure advance tree planting along or adjacent to the highway as essential mitigation.</p> <p><b>Compensate:</b> Provide greater clarity on the extent of woodland loss and compensatory planting for each individual site.</p> <p><b>Compensate:</b> Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP, including clearer distinction between retained and new woodland.</p> <p><b>Compensate/Enhance:</b> Further explanation of the woodland BNG calculations (BNG Statement, APP-136) is requested.</p> <p><b>Compensate/Enhance:</b> Funding of Project Officer and grant scheme to support a local landscape and biodiversity enhancement initiative through a S106 Agreement.</p> <p><b>Monitor:</b> Funding for a joint local authority landscape and biodiversity Compliance Officer for the duration of the construction and aftercare periods through a S106 Agreement.</p> <p><b>Monitor:</b> Further detail is requested in the OLEMP regarding both routine inspections</p>	National Networks NPS (para. 5.26 and 5.32). Airports NPS (para. 5.84, 5.96, 5.97, 5.102 and 5.105).	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss.</p> <p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.</p> <p>The revised oLEMP for Deadline 2 includes, at Annex 5, preliminary locations within the Project where opportunities exist for substantial advance mitigation and enhancement planting proposals to take place. Areas have been identified which would not restrict or compromise the flexibility for construction activities or access throughout the Project programme. Locations adjacent to the surface access improvements works are considered too constrained by construction activities to be viable as locations for advance planting.</p> <p>Woodland is a component habitat of the BNG calculations. Details of the woodlands around the Project site are set out in <b>ES Appendix 9.6.2: Ecology Survey</b></p>

				of maintenance tasks and ecological monitoring.		<p><b>Report</b> [<a href="#">APP124-APP-130</a>]. These details are then used in the BNG calculations.</p> <p>The Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.</p>
9.1E	Loss of trees	C & O	Negative	<p>Reduce: Detailed design must seek to minimise tree loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p>	<p>National Networks NPS (para. 5.32). Airports NPS (para. 5.84, 5.96 and 5.102).</p>	<p>Design Principle L4 requires that green infrastructure assets (i.e. including trees) is retained where possible. In response to this comment, the wording of L4 has been updated to change reference to green infrastructure assets to all existing vegetation for clarity, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3..</p> <p>The Applicant undertook a tree survey of land within the vicinity of the surface access improvements for the ES which is included in <b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] to enable the likely area of greatest vegetation loss as a result of the Project to be identified. The Applicant has undertaken further surveys included in <b>Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [<a href="#">REP1-026</a>, <a href="#">REP1-027</a>, <a href="#">REP1-028</a>, <a href="#">REP1-029</a>, REP1-030] (Doc Ref. 5.3) which sets out the assessment to measure and evaluate how the Project will affect the existing trees in the survey area.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice Annex 6 - Outline Arboricultural Method Statement</b> [<a href="#">REP1-023</a>, <a href="#">REP1-024</a>, <a href="#">REP1-025</a>] which includes Tree Removal and Protection Plans based on the preliminary designs, including location and standard specification of tree protection fences. These drawings will be revisited and refined during the detailed design process and</p>

						submitted as part of the detailed Arboricultural Method Statement to be subject to local planning authority. An <b>An Code of Construction Practice – Annex 6 Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3) has been prepared to include retention and removal of general vegetation within the Project and is submitted at Deadline 3, in addition to trees and woody vegetation.
<b>9.1F</b>	Loss of scrub, notably associated with the highway works	C/O	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p> <p>Monitor: Further detail is requested in the OLEMP regarding both routine inspections of maintenance tasks and ecological monitoring.</p>	National Networks NPS (para. 5.32). Airports NPS (para. 5.84, 5.96 and 5.102).	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3..</p> <p>The approach to monitoring of the establishment and on-going management of habitats is set out in Section 10.19 of <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] .</p>
<b>9.1G</b>	Loss of hedgerows including a hedgerow with mature oak trees to be removed to accommodate the temporary construction works immediately north of the Sussex Border Path.	C	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p>	Airports NPS (para. 5.84, 5.96, 5.97, 5.102 and 5.105).	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3..</p> <p>At the time of the PEIR, this hedgerow was included for removal as part of the assessment scenario. However, following further design evolution, it is now to be retained and will be suitably protected during construction.</p>
<b>9.1H</b>	Impacts to riparian habitats from the proposed widening of the highway bridge over the River Mole	C/O	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p>	National Networks NPS (para. 5.26 and 5.32).	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3..</p>

9.1I	Release of sediment during works to connect the new River Mole diversion and the channels from flood alleviation areas, including Museum Field, with potential impacts on fish and invertebrates.	C	Negative	Reduce: Detailed design must seek to minimise ecological impacts. The design principles in the DAS need to be strengthened to reflect this.	Airports NPS (para. 5.84, 5.96, 5.97, 5.102 and 5.105).	Section 5.6 of the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b> sets out the measures that will be adopted to protect the water environment, including the prevention of sediment ingress to water courses such as the River Mole. Design Principle L4 has been amended to require trees, scrub and hedgerows of ecological value to be retained where possible, in order to minimise ecological impacts, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3..
9.1J	Permanent loss of two ponds within the Project site.	C/O	Negative	Compensate: New ponds need to be provided in compensation, either on-site or off-site. This is currently missing from the proposal.	Airports NPS (para. 5.84, 5.96, 5.97 and 5.105).	As set out in Section 9 of <b>ES Chapter 9: Ecology and Biodiversity [APP-034]</b> , the two ponds impacted by the Project (Pond A and Pond F) are both surface water management features and not S41 Priority ponds; they are considered to have no more than local ecological value. The impacts to these ponds were considered to be of no more than minor adverse significance. Provision of new ponds within the airport site is highly unlikely to be possible due to aircraft safety and bird strike risks. Although no new ponds are proposed, the Project will provide substantial new areas of aquatic habitat in the form of new reedbeds and the extension to the River Mole.
9.1K	Loss of semi-improved grassland	C	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.  Monitor: Further detail is requested in the OLEMP regarding both routine inspections of maintenance tasks and ecological monitoring.	Airports NPS (para. 5.84, 5.96, 5.97 and 5.105).	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.  The approach to monitoring of the establishment and on-going management of habitats is set out in Section 10.19 of <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [REP2-021 ,REP2-023, REP2-025, REP2-027]</b> .
9.1L	Habitat fragmentation and loss of habitat connectivity across	C/O	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in	Airports NPS (para. 5.84 and 5.102).	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss.

	the Project site and into the surrounding landscape, including through loss of woodland and scrub associated with highway works			<p>the DAS need to be strengthened to reflect this.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.</p> <p>Compensate: Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP, including clearer distinction between retained and new woodland.</p> <p>Compensate/Enhance: Funding of Project Officer and grant scheme to support a local landscape and biodiversity enhancement initiative through a S106 Agreement</p> <p>Monitor: Funding for a joint local authority landscape and biodiversity Compliance Officer for the duration of the construction and aftercare periods through a S106 Agreement</p> <p>Monitor: Further detail is requested in the OLEMP regarding both routine inspections of maintenance tasks and ecological monitoring.</p>	National Networks NPS (para. 5.32).	<p><b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3) sets out the Project’s approach to BNG. This demonstrates that the Project will achieve circa 21% habitat BNG at least 11% hedgerow BNG and 17% watercourse BNG.</p> <p>In addition, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] sets out details of the concept landscape designs. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO that requires the individual LEMPs be produced for each phase of the Project with these detailed LEMPs to be in general accordance with the oLEMP.</p> <p>Further, the Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.</p>
<b>9.1M</b>	Impacts on bats, including Bechstein’s, Alcathoe and barbastelle bat, through disturbance and loss of habitat, notably woodland, leading to impacts on commuting, foraging and roosting activity	C/O	Negative	<p>Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.</p> <p>Mitigate/Compensate: Additional habitat creation may be required to maintain bat foraging habitat and commuting routes.</p> <p>Compensate: Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP, including clearer distinction between retained and new woodland.</p> <p>Compensate/Enhance: Funding of Project Officer and grant scheme to support a local landscape and biodiversity enhancement</p>	<p>Airports NPS (para. 5.97, 5.102 and 5.105).</p> <p>National Networks NPS (para. 5.26 and 5.32).</p>	<p>The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss. The impact of the Project on bats is fully assessed in Section 9 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>]. The conclusion of this assessment is that there would be a moderate adverse effect on the general bat population (excluding Bechstein’s) due to the vegetation removal necessary to build the highways works along the A23. This is reduced to negligible by the end of assessment period as replacement planting will have matured sufficiently by this point.</p> <p><b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3) sets out the Project’s approach to BNG.</p>

				initiative through a S106 Agreement Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed.		<p>This demonstrates that the Project will achieve circa 21% habitat BNG, at least 11% hedgerow BNG and 17% watercourse BNG.</p> <p>In addition, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] sets out details of the concept landscape designs. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO that requires the individual LEMPs be produced for each phase of the Project with these detailed LEMPs to be in general accordance with the oLEMP.</p> <p>Further, the Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.</p>
<b>9.1N</b>	Impacts on birds through disturbance and loss of habitat	C	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.	<p>Airports NPS (para. 5.97 and 5.105).</p> <p>National Networks NPS (para. 5.26 and 5.32).</p>	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.
<b>9.1O</b>	Impacts on great crested newts through disturbance and loss of habitat	C	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.	Airports NPS (para. 5.96, 5.97 and 5.105).	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.
<b>9.1P</b>	Impacts on grass snake through	C	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in	Airports NPS (para. 5.96, 5.97 and	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss,



	disturbance and loss of habitat			the DAS need to be strengthened to reflect this.	5.105).	contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.
9.1Q	Impacts on badgers through disturbance and loss of habitat	C	Negative	Reduce: Detailed design must seek to minimise habitat loss. The design principles in the DAS need to be strengthened to reflect this.	Airports NPS (para. 5.96, 5.97 and 5.105). National Networks NPS (para. 5.26 and 5.32).	The project-wide design principle L1 has been amended to require detailed design to retain habitats of ecological value where possible, in order to minimise habitat loss, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.
9.1R	Impacts on fish through modifications to river channels and links to new flood alleviation areas	C	Negative	Reduce: Detailed design must seek to minimise ecological impacts. The design principles in the DAS need to be strengthened to reflect this.	Airports NPS (para. 5.96, 5.97 and 5.105). National Networks NPS (para. 5.26 and 5.32).	Design Principle DBF16 ensures that detailed design includes the creation of a fish pass. The design principle has been updated to ensure the fish pass is designed for multi species, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.
9.1S	The NWZ and LERL biodiversity areas will be retained and continue to be managed for biodiversity by the Applicant.	C/O	Neutral	Avoid: Secure greater protection of these areas within the CoCP through vegetation retention plans and protective fencing. Compensate/Enhance: Commitment required within the OLEMP for the long- term positive management of these biodiversity areas. Monitor: The ecological monitoring section in the OLEMP needs to be expanded into a detailed ecological monitoring strategy which should include the NWZ and LERL biodiversity areas.	Airports NPS (para. 5.84, 5.96, 5.97, 5.102 and 5.105).	Much of both the NWZ and LERL are outwith the Order Limits. Those areas that are adjacent to works will be protected, as set out in the <b>ES Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural Method Statement</b> [ <a href="#">REP1-023</a> , <a href="#">REP1-024</a> , <a href="#">REP1-025</a> ] AMS/VMS <b>ES Appendix 8.8.1: Outline Landscape and Ecology Managment Plan</b> [ <a href="#">REP2-021</a> , <a href="#">REP2-023</a> , <a href="#">REP2-025</a> , <a href="#">REP2-027</a> ] sets out the broad vision for the ecology strategy for the airport moving forwards should the NRP be granted Development Consent. This includes both existing biodiversity areas and expands them, the NWZ in particular. As such, their presence within the <b>ES Appendix 8.8.1: Outline Landscape and Ecology Managment Plan</b> [ <a href="#">REP2-021</a> , <a href="#">REP2-023</a> , <a href="#">REP2-025</a> , <a href="#">REP2-027</a> ] secures their on-going management and maintenance.

<b>9.1T</b>	The provision of on-site Biodiversity Net Gain (BNG).	O	Positive	<p>Enhance: Delivery of BNG, comprising on-site habitat creation and enhancement, needs to be secured through the draft DCO requirements.</p> <p>Compensate: Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP, including clearer distinction between retained and new woodland.</p> <p>Compensate/Enhance: Further explanation of the woodland BNG calculations (in the BNG Statement) is requested.</p> <p>Compensate/Enhance: Off-site BNG is needed, notably woodland and pond habitats.</p> <p>Enhance: Further opportunities for on-site biodiversity enhancement should be explored.</p> <p>Monitor: Further detail is requested in the OLEMP regarding routine inspections of maintenance tasks.</p> <p>Monitor: The ecological monitoring section in the OLEMP needs to be expanded into a detailed ecological monitoring strategy.</p>	<p>National Networks NPS (para. 5.32).</p> <p>Airports NPS (para. 5.84, 5.94 and 5.96).</p>	<p>Woodland is a component habitat of the BNG calculations. Details of the woodlands within the Project site are set out in <b>ES Appendix 9.6.2: Ecology Survey Report</b> [<a href="#">APP124-APP-130</a>]. These details are then used in the BNG calculations.</p> <p>The approach to monitoring of the establishment and on-going management of habitats is set out in Section 10.19 of <b>ES Appendix 8.8.1 Outline Landscape and Ecology Managment Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a> ,<a href="#">REP2-025</a> ,<a href="#">REP2-027</a> ] .</p>
<b>9.1U</b>	Habitat creation including the proposed River Mole diversion and associated grassland habitats, wet grassland at Museum Field and wet woodland and species-rich grassland at Brook Farm	O	Positive	<p>Compensate: Provide greater clarity in the Sketch Landscape Concept plans within the OLEMP, including clearer distinction between retained and new woodland.</p> <p>Compensate/Enhance: Off-site compensatory habitat creation and BNG are needed, including woodland and pond habitats.</p> <p>Monitor: Further detail is requested in the OLEMP regarding routine inspections of maintenance tasks.</p> <p>Monitor: The ecological monitoring section in the OLEMP needs to be expanded into a detailed ecological monitoring strategy.</p>	<p>National Networks NPS (para. 5.32).</p> <p>Airports NPS (para. 5.84, 5.96 and 5.105).</p>	<p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Managment Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a> ,<a href="#">REP2-025</a> ,<a href="#">REP2-027</a> ] sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.</p> <p>The approach to monitoring of the establishment and on-going management of habitats is set out in Section 10.19 of <b>ES Appendix 8.8.1: Outline Landscape and Ecology</b></p>

				Monitor: Funding for a joint local authority landscape and biodiversity Compliance Officer for the duration of the construction and aftercare periods through a S106 Agreement.		<b>Management Plan</b> [ <a href="#">REP2-021</a> , <a href="#">REP2-023</a> , <a href="#">REP2-025</a> , <a href="#">REP2-027</a> ].
<b>9.1V</b>	Habitat enhancements for fish: Installation of a small weir to improve fish passage during periods of low flow where a culvert conveys the River Mole under the runways.	O	Positive		Airports NPS (para. 5.84 and 5.102).	<p>A suitable fish pass will be installed on the culvert. The fish pass will be designed to be multi species and will be installed at the time of the culvert installation.</p> <p>Design Principle DBF16 ensures that detailed design includes the creation of a fish pass. The design principle has been updated to ensure the fish pass is designed for multi species, contained in the <b>Design Principles</b> (Doc Ref. 7.3) submitted at Deadline 3.</p> <p><b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3) sets out the Project’s approach to BNG. This demonstrates that the Project will achieve circa 21% habitat BNG at least 11% hedgerow BNG and 17% watercourse BNG.</p> <p>Further, the Applicant has proposed funding for the Gatwick Greenspace Partnership within the <b>Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] submitted at Deadline 2. This funding is to be implemented by Sussex Wildlife Trust to deliver the community projects identified by the Gatwick Greenspace Partnership. These activities can take place beyond the Order Limits in the areas of Horsham, Crawley, Horley, Reigate and Dorking.</p>
<b>Arboriculture</b>						
<b>9.1X</b>	Tree loss within surrounding ancient woodland.	C	Neutral	<p>Avoid: Detailed design must ensure no tree loss within ancient woodland should the Project gain consent.</p> <p>Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s.</p>	National Policy Statement for National Networks (para. 5.32) and Airports (para. 5.103). National Planning Policy Framework (para. 186).	<p>No area of ancient woodland is included within the Project Site.</p> <p>A 15m buffer zone is shown on the Tree Protection Plans as part of the Outline AMS and a new project-wide design principle (L10) has been added to ensure the provision of a 15m protection buffer zone around areas of Ancient Woodland next to the Project site, noting above that no areas of Ancient Woodland are within the site boundary.</p> <p><b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>,</p>

				<p>Requirement: The DAS, CoCP and OLEMP, each of which is secured by requirement, need to be improved in accordance with the comments made in this table.</p>	<p>Crawley BC Local Planning Policy ENV2: Biodiversity.</p>	<p><a href="#">REP2-027</a> sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the <b>draft Development Consent Order</b> {Doc Ref. 2.1). A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.</p> <p>The completion of tree surveys and the preparation of tree protection plans demonstrates that tree protection measures and root protection areas can be accommodated within tree removal areas to minimise harm to trees during construction periods within the application site. As part of the DCO, <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] assesses a reasonable worst case scenario for tree and vegetation removal based on assumed clearance of the land required for construction activities.</p> <p>The Applicant undertook a tree survey of land within the vicinity of the surface access improvements for the ES which is included in <b>ES Appendix 8.8.1: Outline Landscape and Ecology management Plan</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] to enable the likely area of greatest vegetation loss as a result of the Project to be identified. Annex 4 of the oLEMP includes a set of nine Surface Access Tree Survey and Tree Removal and Protection Plans. The Applicant has undertaken further surveys included in <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [<a href="#">REP1-026</a>, <a href="#">REP1-027</a>, <a href="#">REP1-028</a>, <a href="#">REP1-029</a>, <a href="#">REP1-030</a>]. The document provides outline plans for tree retention and trees likely to be removed based on preliminary designs. The report identifies root protection zones which inform protective measures during development.</p>
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						<b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021] - Outline Arboricultural Method Statement [REP1-023, REP1-024, REP1-025]</b> which identifies measures to protect root protection zones. The measures along with Detailed Tree Removal and Protection Plans, specifying the trees to be retained, will be contained as part of the Detailed Arboricultural Method Statements for approval by the relevant planning authority prior to the relevant construction works commencing.
9.1Y	Potential for the deterioration or loss of ancient (aged) or veteran trees.	C	Negative	Avoid: Detailed design and mitigating tree protection measures must ensure no construction activity is undertaken within the buffer zone of ancient or veteran trees. Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s. Requirement: The DAS, CoCP and OLEMP, each of which is secured by requirement, need to be improved in accordance with the comments made in this table.	National Policy Statement for National Networks (para. 5.32) and Airports (para. 5.103). National Planning Policy Framework (para. 136, 180 & 186). Crawley BC Local Planning Policy ENV2: Biodiversity.	As set out in <b>Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment [REP1-026, REP1-027, REP1-028, REP1-029, REP1-030]</b> , no veteran trees occur within the Project site and, as such, no protection measures for such trees are necessary. See 9.1x above
9.1Z	Potential for the deterioration of ancient woodland, including Horley Wood.	C	Negative	Avoid: Detailed design and mitigating tree protection measures must ensure the proposed pipeline adjacent to Horley Wood remains outside the woodland and its buffer zone. Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s. Requirement: The DAS, CoCP and OLEMP, each of which is secured by requirement,	National Policy Statement for National Networks (para. 5.32) and Airports (para. 5.103). National Planning Policy Framework (para. 136, 180 & 186). Crawley BC Local Planning Policy	See 9.1x above

				need to be improved in accordance with the comments made in this table.	ENV2: Biodiversity.	
<b>9.1AA</b>	Potential for adverse impacts to retained trees due to inadequate and unsecured tree protection measures.	C	Negative	Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s. Requirement: The DAS, CoCP and OLEMP, each of which is secured by requirement, need to be improved in accordance with the comments made in this table.		See 9.1x above
<b>9.1AB</b>	Removal and retention of numerous trees of unknown quality trees, hedgerows and woodland groups to facilitate aspects of the Project.	C	Negative	Provide: An arboricultural impact assessment within the ES. Avoid: Adverse arboricultural impacts through the retention of higher quality trees. “Demonstrate how design has avoided impacts to arboricultural features, favouring the retention of higher quality trees where possible.” Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s. Requirement: Detailed design, CoCP and OLEMP Compensation: Provide outline landscaping plan which includes tree planting proposals which demonstrate they comply with relevant local policies. Ensure the OLEMP secures the delivery of final landscaping plans, planting specifications and detailed aftercare plan within LEMPS.	National Planning Policy Framework (para. 136 & 180).  Crawley BC Local Planning Policies CH6, ENV1 and GISPD	See 9.1x above
<b>9.1AC</b>	Significant loss of, and inadequate	C	Negative	Provide: An arboricultural impact assessment within the ES.	Crawley BC Local Planning Policies	See 9.1x above

	protection of, numerous moderate and high quality trees and woodland groups to facilitate surface access works.			<p>Avoid: Detailed design must seek to reduce the loss of moderate and high quality trees.</p> <p>Mitigate: Provide an outline arboricultural method statement, outline tree protection plan and an outline tree retention/removals plan for all aspects of the Project with the CoCP. Detailed versions of these documents must be delivered within LEMP/s.</p> <p>Requirement: The DAS, CoCP and OLEMP, each of which is secured by requirement, need to be improved in accordance with the comments made in this table.</p> <p>Compensation: Secure means of advanced planting along or adjacent to the surface access works as essential mitigation.</p>	CH6, ENV1 and GISPD.	
<b>9.1AD</b>	Failure of tree establishment due to inadequate tree planting maintenance and aftercare programme.	O	Negative	<p>Change: outline programme for tree planting within OLEMP to meet basic tree establishment requirements.</p> <p>Requirement: The OLEMP needs to be improved in accordance with the comments made in this table.</p>	National Planning Policy Framework (para. 136).	<p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Mangment Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a> ,<a href="#">REP2-025</a> ,<a href="#">REP2-027</a>] sets the overarching vision for the Project. Landscape operations for implementation and maintenance activities would be undertaken in accordance with BS 4428 and BS 7370, as stated in section 8: Workmanship of the oLEMP. Section 5 of the oLEMP sets out Performance Requirements, section 9 sets out Responsibilities for Management and section 10 sets out a Schedule of Maintenance. A typical programme of maintenance operations is included in Annex 1 and a Landscape Maintenance Schedule at Annex 2 of the oLEMP. Following detailed design, a LEMP for individual parts of the Project will be submitted to and approved by the relevant local authority before work on that part commences as set out within Requirement 8(1) of the draft DCO. These LEMPs will be substantially in accordance with the outline LEMP and will include appropriate details of implementation, aftercare and ongoing maintenance activities.</p>
<b>9.1AE</b>	Unidentifiable tree and woodland	C	Neutral	Change: Provide illustrative landscape concepts with clearer detail (keys/legend) for	Crawley BC Local Planning Policies	<p><b>ES Appendix 8.8.1 Outline Landscape and Ecology Mangment Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a> ,<a href="#">REP2-025</a> ,</p>

	planting within illustrative landscape concepts providing unknown tree compensation/gain.			tree planting as new and existing trees are not clear.	CH6, ENV1 and GISPD.	<a href="#">REP2-027</a> ] sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be in general accordance with the principles in the outline LEMP.
<b>9.1AF</b>	Long-term temporary loss of tree, hedgerow and woodland due to Surface Access works	O	Neutral	Avoid: Reduce losses during detailed design where possible. Mitigation: Provide advanced tree planting as essential mitigation wherever possible, including land adjacent to the DCO Limits. This should be secured through the OLEMP or within the BNG strategy.	Crawley BC Local Planning Policies CH6, ENV1 and GISPD.	<b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [ <a href="#">REP2-021</a> , <a href="#">REP2-023</a> , <a href="#">REP2-025</a> , <a href="#">REP2-027</a> ] sets the overarching vision for the Project and tree survey and protection methods required to achieve this. The obligations within the outline LEMP will be secured through Requirement 8 (1) of the draft DCO. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the principles in the outline LEMP. The revised oLEMP for Deadline 2 includes, at Annex 5, preliminary locations within the Project where opportunities exist for substantial advance mitigation and enhancement planting proposals to take place. Areas have been identified which would not restrict or compromise the flexibility for construction activities or access throughout the Project programme.
<b>9.1AG</b>	Potential for deterioration or loss of important hedgerows.	C	Neutral	Avoid: Provide survey findings and methodology for the identification of important hedgerows and how these are avoided if present.	Hedgerow Regulations 1997.	The only hedgerows within the Project that may be lost comprise those planted within existing car parks. As set out in <b>ES Appendix 9.6.2: Ecology Survey Report</b> [ <a href="#">APP-124-APP-130</a> ], these are all species poor and so were screened out from any requirement for Hedgerow Regulation Surveys.
<b>9.1AH</b>	Unclear compensation strategy for tree loss potentially conflicting with BNG strategy.	O	Negative	Change: Provide clarity as to how proposed tree planting compensates for tree loss, and how planting considered within BNG does not form essential compensation.	Crawley BC Local Planning Policy CH6 and GISPD.	Government guidance on the implementation of BNG allows for the inclusion of mitigation and compensation actions as long as at least 10% come from additional activities ( <a href="https://www.gov.uk/guidance/what-you-can-">https://www.gov.uk/guidance/what-you-can-</a>



						<a href="#">count-towards-a-developments-biodiversity-net-gain-bng</a> ). As set out in the updated BNG Statement submitted at Deadline 3, the loss of woodland units overall means - 65.13 units come from woodland. Therefore, the total gain of 73.37 units mean that >10% of the total score is from other activities that are not related to woodland planting.
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#### 4.8 Water Environment

4.8.1 The following table sets out the Applicant’s response to matters raised on Water Environment.

**Table 4.4: The Applicant’s response to matters raised on water environment**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
10.1A	Design concept	C/ O	Negative	<p>It would be helpful if GAL could share their design strategies and parameters they intend to adopt and how these strategies have considered key stakeholders views to understand how aligned or otherwise, they are with our views on the drainage and FRA work.</p> <p>A sound drainage design concept and strategy that considers the views of the Authorities is required, as this forms the basis on which the detailed design will be developed.</p>	ANPS – paragraph 5.147  NPPF Section 14, para 166  CBLP policy ENV8, mCBLPolicy EP1	<p>A summary of the highways drainage strategy is provided in <b>ES Appendix 11.9.6: Flood Risk Assessment Annex 1-2 [APP-148]</b>. The airfield surface water drainage strategy is set out in <b>ES Appendix 11.9.6: Flood Risk Assessment [APP-147]</b> and its <b>ES Appendix 11.9.6: Flood Risk Assessment Annex 3 [APP-149]</b>.</p> <p>The drainage strategies demonstrate that through the provision of mitigation measures the increase in impermeable area that would result from the Project would not increase flood risk to other parties for its lifetime including an allowance for the predicted impact of climate change.</p> <p>Requirements 10 and 11 of the <b>draft Development Consent Order</b> (Doc Ref. 2.1) state that approval will be required from CBC (in consultation with WSCC, the EA and Thames Water) and the relevant highway authority (in consultation with the EA and the relevant lead local flood authority) (respectively) to the drainage detailed designs before construction may commence. In addition, these requirements state that the designs must be in accordance with the <b>Design Principles</b> (Doc Ref. 7.3) which include drainage specific design principles.</p>

10.1B	Watercourse Geomorphology	O	Negative	Mitigation measures/strategy should be considered for the connection between the Museum Field compensation storage area and the River Mole to ensure there will be no detrimental effect on the geomorphology of the watercourse bed post construction.	NPPF section 14 Para 165 and 166	Table 11.8.1 of <b>ES Chapter 11: Water Environment</b> [APP-036] sets out the mitigation measures that would be included to mitigate the specific impacts of the connection between the Museum Field FCA and the River Mole. The <b>ES Chapter 11: Water Environment Appendix 11.9.1 Geomorphology Assessment</b> [APP-142] Appendix Section 6.6 Monitoring describes the approach to the monitoring. Should excessive erosion be observed through monitoring it would only be mitigated if receptors were placed at risk as channel movement and dynamism should be allowed due to biodiversity benefits unless receptors are at risk of erosion.
10.1C	Attenuation structures/ features	O	Negative	The use of concrete and high carbon emission attenuation structures should be avoided if possible. Reed beds should be considered to provide water treatment for the contaminated water earlier in the treatment process, to remove the need for a pumping station and reduce carbon emissions.	NPPF Section 14, para 159(b)	This is noted and will be considered in detailed design and in compliance with the construction commitments set out in the <b>ES Appendix 5.4.2: Carbon Action Plan</b> [APP-091]. The provision of standing bodies of water in the vicinity of aircraft however, must be avoided due to the risk of attracting birds and the consequential risk of bird strikes.
10.1D	Ecology	C/O	Negative	The Applicant should consider the effect of the increase in impermeable area of each catchment, the resultant change in discharge to the Gatwick stream and River Mole and the effect this will have on biodiversity and provide mitigation where necessary. Furthermore, there is an overlap between drainage and ecology matters in relation to the northwest area and the impact on the river Mole. It is necessary to understand the impact the drainage design and engineering solutions have on ecology in relation to matters such as capacity for additional volume, sediment build up, flood overspill, de-icer storage and pollution control measures.	NPPF Section 14, para 158  CBLP policy ENV10,  MCBLP Policy EP3	The Project design for the airfield includes the provision of additional storage and attenuation tanks (including the tank beneath Car Park Y) within the existing surface water drainage to mitigate for the additional runoff that would result from the increase in impermeable area to ensure no increase in flood risk. <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [APP-147] and <b>ES Appendix 11.9.6: Flood Risk Assessment Annex 3-6</b> [APP-149] set out the airfield drainage strategy. The highways drainage design is set out in <b>ES Appendix 11.9.6: Flood Risk Assessment Annex 1-2</b> [APP-148]. Attenuation storage would be provided via ponds, swales and tanks to ensure no increase in flood risk and treat additional runoff due to the Project to ensure no detrimental effects on water quality in receiving watercourses. The Project would reduce peak runoff rates to receiving watercourses, volumes would not change. Therefore, no

						<p>effect on biodiversity is anticipated and no mitigation is proposed.</p> <p><b>ES Appendix 11.9.4: Water Quality De-Icer Impact Assessment</b> [APP-145] sets out the proposed mitigation strategy for the potential increase in de-icer use as a result of additional air-traffic movements that would result from the project. A combination of the storage tank beneath Car Pak Y and a new treatment facility that would increase storage capacity in the long-term storage lagoons would ensure no detrimental effects on receiving watercourses.</p> <p>Table 11.8.1 of <b>ES Chapter 11 Water Environment</b> [APP-036] sets out the aquatic ecology mitigation measures that would be included to mitigate the specific impacts of the connection between the Museum Field FCA and the River Mole.</p>
<b>10.1E</b>	Proposed use of a pumping station	C/O	Negative	<p>The long-term use of a pumping station could result in significant carbon emissions. If a pump is to be used, consideration of pump failure and emergency procedures should be provided as part of the FRA and Drainage Strategy. Alternatively, features such as reed beds should be considered to provide water treatment for the contaminated water earlier in the treatment process, to remove the need for a pumping station and reduce carbon emissions.</p>	<p>NPPF</p> <p>Section 14, paras 159(b) and 173</p>	<p>The drainage catchment that the pumping station would serve is located at the western end of the main runway and adjacent to the proposed western end-around taxiway.</p> <p>The provision of standing bodies of water in the vicinity of aircraft needs to be avoided due to the risk of attracting birds and the consequential risk of bird strikes.</p> <p>Gatwick's response to emergency flood response situations is set out in the <b>ES Appendix 11.9.6: Flood Resilience Statement Annex 3-6</b> [APP-149] (secured by Requirement 24 of the draft DCO). Given the relatively small size of the catchment draining to the proposed pumping station, Gatwick could include stand-by pumping capacity or deploy temporary pumping facilities while repairs are undertaken which would be considered further during the detailed design process.</p>
<b>10.1F</b>	Residual risk	O	Negative	<p>The possibility of a blockage within the flood structures may be more likely especially due to the ever-increasing effect of climate change. The Applicant should identify potential flood flash points and test the</p>	<p>NPPF Section 14, para 166</p> <p>NNNPS par 5.94</p>	<p>The Applicant's response to emergency flood response situations such as when the design capacity of a feature is exceeded (residual risk) is set out in the <b>ES Appendix 11.9.6: Flood Resilience Statement Annex 3-6</b> [APP-149] (secured by DCO Requirement 24).</p>

				scenario where there will be blockage and where possible use this to influence the design. The Applicant should also explain how they should intend to deal and manage with the residual risks.	ANPS para 5.154  CBLP policies ENV8 and ENV10  mCBLP policies EP1 and EP3	Section 3.7 of the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [APP-147] includes consideration of the Credible Maximum Scenario in accordance with Environment Agency guidance. As would be expected under such a scenario flood extents and depths would increase compared to the design scenario. However, it would not give rise to a change in the ES assessment conclusions: that the increased risk to the airport would be safely managed by Gatwick as set out in the Flood Resilience Statement and the Project would not increase flood risk to other parties.
<b>10.1.G</b>	Sustainable approach to flood mitigation	Construction and operation	Neutral	The Applicant's proposals manage the construction of additional three hectares of carriageway can be improved, and this should be an opportunity for GAL to improve on the sustainability aspect of the Highway and, in addition to water quantity, provide a water quality mitigation strategy in line with the SuDS manual. This should not be a case of just doing the minimum.	NPPF  Section 14, paragraph 159(a)  CBLP  Policies ENV8 and ENV10  mCBLP  policy EP1	The surface access improvements drainage strategy includes a number of SuDS measures to address the additional runoff and traffic that would result from the Project. These include oversized pipes, basins and swales.  The use of SuDS is included in the <b>Design Principles</b> (Doc Ref. 7.3) DDP3 and DDP5 which are secured by DCO Requirement 4.  A HEWRAT assessment of the water quality impacts of the surface access improvements has been undertaken and no significant environmental effects have been identified, see <b>ES Appendix 11.9.3: Water Quality HEWRAT Assessment</b> [APP-144].

#### 4.9 Agricultural Land Use and Recreation

4.9.1 The following table sets out the Applicant's response to matters raised on Agricultural Land Use and Recreation.

**Table 4.5: The Applicant's response to matters raised on agricultural land use and recreation**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>11.1A</b>	Creation of new informal recreation space – Museum Field	Operation	Positive	Change: The relative inaccessibility via an indirect permissive route and remote location of the space with poor links to existing PRoW is a barrier to effective use by the nearby community. Applicant should consider	CBLP policies SD1, CH11 and ENV4.	The area of land around Museum Field does not form part of the proposed replacement open space. The areas of replacement open space are described in <b>ES Chapter 19 Agricultural Land Use and Recreation</b> [APP-044] paragraphs 19.9.39 – 19.9.50.

				<p>improved connectivity and provide further detail on management, signposting etc.</p> <p>Requirement: Site specific LEMP</p>	<p>Although not a PRow or replacement open space these policies encourage provision of accessible open space in suitable locations.</p> <p>mCBLP policies SD2, OS1, OS3</p>	<p>However, it is proposed that the public would have access to the area of landscape and ecological mitigation from the existing permissive access route along the west bank of the River Mole.</p> <p>Before work can commence on any part of the Project a landscape and ecology management plan (LEMP) for that part must be submitted to and approved by the local planning authority. Those LEMPs must be substantially in accordance with the principles in the <b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan</b> [<a href="#">REP2-021</a> ,<a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>] (pursuant to DCO Requirement 8)</p>
<b>11.1B</b>	Impact on PRow 359Sy Pentagon Field and PRow 360Sy	Construction and Operation	Negative	<p>Change: Further information required on how the path will be maintained during construction and operation phases.</p> <p>Requirement: Details required within control document with accompanying plans.</p>	<p>CBLP policies CH11 and GAT1 require adequate mitigation of PRow to provide route of equal or better value and to ensure airport operations are mitigated.</p> <p>mCBLP policies OS3, GAT1*</p>	<p>The <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> [REP2-009] at paragraph 1.1.3 states that “Detailed PRow implementation plans would be in general alignment with the PRow Management Strategy for the Project and subject to approval by the relevant Local Planning Authority (LPA)”. This is secured by DCO Requirement 22. The Strategy identifies the definitive PRow likely to be affected by the Project, including the route between the B 2036 southwards towards Radford Road where PRow implementation plans would be likely to be required.</p> <p>Pentagon Field is proposed to be used for the deposition of spoil from excavations within the Project and will then be restored to grassland which can be returned to its former agricultural use. During the works to deposit spoil, management measures may be required, in accordance with the principles in the PRow strategy, to ensure that access to Footpath 359sy remains throughout the construction period.</p>
<b>11.1C</b>	Timing and adequacy of replacement open space Car Park B	Operation	Negative	<p>Change: further information is needed on timing, management qualitative amenity benefit and purpose.</p>	<p>CBLP policy ENV4 requires equivalent or better provision (quality and</p>	<p>At Car Park B, the replacement open space cannot be established in advance of the loss of the fringe of land in Riverside Garden Park as the northern part of Car Park B is required as a construction compound and the other areas will be required for construction access to carry out</p>

				<p>Requirement: Details required within accompanying control documents.</p>	<p>quantity) in a suitable location.</p> <p>mCBLP policy OS1</p>	<p>the construction works to the carriageway in the vicinity of the Airport Way railway bridge. However, the loss of the land on the southern fringe of the park, which mainly comprises the highway embankment, would not restrict the continued use of the main recreational space in the park, with the main access to the park from Crescent Way and car parking facilities maintained throughout the construction period.</p> <p>Replacement land for the loss of 1.03ha of open space in Riverside Garden Park and the small, isolated area of open space to the north of the River Mole would comprise a greater area of approximately 1.43ha of open space within the existing areas of Car Park B (North and South). The replacement open space would be located within close proximity to those areas of public open space that would be permanently lost and would therefore be accessible to the communities that they currently serve, including local residents as well as airport staff and visitors. Accessibility to the replacement areas in Car Park B north would be provided through a new pedestrian connection from Riverside Garden Park into the north side of the replacement land. There would also be access into this area from the west from the current route of the Sussex Border Path. Access into the replacement Car Park B south area would be available from the existing shared use pedestrian and NCR 21 route along the west side of the replacement land and also from the Sussex Border Path immediately to the east.</p> <p>Specific landscaping principles and concept designs for the replacement open space have been developed as part of the wider <b>ES Appendix 8.8.1: Outline Landscape and Ecological Management Plan (oLEMP)</b> [<a href="#">REP2-021</a>, <a href="#">REP2-023</a>, <a href="#">REP2-025</a>, <a href="#">REP2-027</a>]. The application of these principles would be developed in the detailed LEMPs, in line with Requirement 8 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) to enable these spaces to be used in the same way and by the</p>
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						<p>same communities as the areas of open space permanently lost.</p> <p>Replacement open space areas at Car Park B North and South would comprise a similar mix of woodland areas and accessible grassland areas with a network of paths, as currently exist in Riverside Garden Park, together with the provision of seating areas.</p> <p>Once the planting is fully established and matures over time as part of the agreed management plan, the areas of Car Park B North and South would provide larger areas of high quality, accessible open space than exists currently, providing enhanced access to the Sussex Border Path, compared to the loss of open space within Riverside Garden Park along a narrow strip of predominantly highways embankment planting. The Applicant will maintain Car Park B replacement open space in accordance with the approved LEMP.</p>
<b>11.1D</b>	Lack of PRow and active travel enhancements	Operation	Negative	<p>Change: Further information on commitments to improvements to NCR21 to promote active travel. At present there are no real PRow improvements proposed either inside or outside the DCO Limits.</p> <p>Requirement See reference in Section 17 Table 17.L for further details</p>	<p>CBLP policies CH11 and GAT1 require adequate mitigation of PRow to provide route of equal or better value and to ensure airport operations are mitigated.</p> <p>mCBLP policies OS3, GAT1*</p>	<p>Due consideration has been given to the development of the proposed active travel infrastructure improvements as part of the Project and a substantial number of improvements form part of the proposals. The Additional Active Travel Provision provided as part of the Project is identified on the <b>Rights of Way and Access Plans</b> [REP1-014] and also described in the <b>Applicant's Response to Actions from Specific Issue Hearing 4: Surface Transport</b> [REP1- 065]</p> <p>A PRow management strategy document, secured by DCO Requirement 22 has been produced as part of the <b>ES 19.8.1 Public Rights of Way Management Strategy</b> [REP2-009].</p>

#### 4.10 Geology and Ground Conditions

4.10.1 The following table sets out the Applicant's response to matters raised on Geology and Ground Conditions.

**Table 4.6: The Applicant's response to matters raised on geology and ground conditions**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
12.1A	Potential needless sterilisation of safeguarded clay	C / O	Negative	Mitigate - provide sufficient detail within the CoCP (APP-082) and the CoCP Annex 5 – Construction Resource and Waste Management Plan (APP-087) about safeguarding minerals, the outcomes of the MRA, and how prior extraction of any surplus clay will be managed, where it will be sent, and how needless sterilisation is to be avoided, through the Materials Management Plans that are proposed to be prepared (paragraph 2.1.8, CRWMP, APP-087).	The Airport NPS, (paragraph 5.117)  The Airport NPS, (paragraph 5.121)  West Sussex Joint Minerals Local Plan: Policy M9  Safeguarding Minerals.	The matters related to mitigation are included at Table 2.10 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council</b> [REP1-033]. The Applicant will continue to engage with West Sussex County Council on this matter and provide further updates to the SoCG in due course.

#### 4.11 Air Quality

4.11.1 The following table sets out the Applicant's response to matters raised on Air Quality.

**Table 4.7: The Applicant's response to matters raised on air quality**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
13.1.A	Dust and Particulate Matter	Construction	Negative	Dust Management Plan (or a draft DMP) based on IAQM best practice guidance to be provided within the CoCP as a key control document and secured by Requirement (Requirement 7) in the Draft DCO.  The draft DMP to be made available for the examination phase and be approved by the LPA. DMP should include (but not limited to): <ul style="list-style-type: none"> <li>• Baseline monitoring.</li> <li>• Locations of highest dust risk,</li> </ul>	CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38  ANPS 5.231, 5.234  and 5.236	This matter is included at 2.2.4.4 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> [REP1-032]. The Draft CDMP shared for comment on the 26th March has considered the items requested in the Local Impact Report.



				<ul style="list-style-type: none"> <li>• Compliance monitoring methods.</li> <li>• Monitoring locations.</li> <li>• Dust thresholds for trigger abatement.</li> <li>• Procedures for recording, reviewing monitoring results and adjusting mitigation.</li> <li>• Data sharing and reporting with LPA.</li> <li>• Complaints and resolution process.</li> <li>• Communications and Engagement Plan sharing with local authorities.</li> </ul> <p>Proposed dust mitigation measures.</p>	NPPF 180	
<b>13.1.B</b>	Odour from putrescible grounds conditions	Construction	Negative	<p>Odour Management Plan (or a draft OMP) based on best practice to be secured within the CoCP (Requirement 7 draft DCO).</p> <p>The draft OMP to be made available for the examination phase and be approved by the LPA. OMP should include (but not limited to):</p> <ul style="list-style-type: none"> <li>• Procedures for recording, reviewing monitoring results and adjusting mitigation.</li> <li>• Data sharing and reporting with LPA.</li> <li>• Complaints and resolution process</li> <li>• Communications and Engagement Plan sharing with local authorities.</li> </ul> <p>Proposed odour mitigation measures</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.231, 5.234</p> <p>and 5.236 NPPF 180</p>	<p>The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers odour management and monitoring.</p> <p>Paragraphs 5.8.3 to 5.8.5 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> [REP1-021] set out odour management procedures.</p>
<b>13.1.C</b>	Construction Traffic Emissions	Construction	Negative	<p>Construction Traffic Management Plan (CTMP) and Construction Worker Transport Management Plan (CWTMP) –Amendments within the CoCP (Requirement 12 draft DCO) to require mechanisms for monitoring and control, and criteria for use of contingency construction routes.</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p>	<p>This matter is included at 2.2.4.8 and 2.2.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> [<a href="#">REP1-032</a>].</p>

				<p>Amendments to the CTMP and CWTMP be approved by the LPA</p> <p>Mitigation may also be secured through a s106 agreement to support Crawley Borough Council's air quality monitoring responsibilities for LAQM Further details 13.1.G(Operational Monitoring and Funding).</p>	<p>ANPS 5.33, 5.35,5.36, 5.37 5.40, 5.41, 5.42 NPPF 192</p>	
<b>13.1.D</b>	Non-Road Mobile Machinery (NRMM) Emissions	Construction	Negative	<p>CTMP Amendments to the CTMP within the CoCP (Requirement 7 draft DCO) to require compliance with the London Low Emission Zone for construction road vehicles, and with the London</p> <p>Non-Road Mobile Machinery standards for NRMM.</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.40, NPPF 180</p>	This matter is included at 2.2.4.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and Horsham District Council</b> <a href="#">[REP1-040]</a> .
<b>13.1.E</b>	Airport Related Emissions including: traffic, car parking, CARE facility, combustion plant and aviation emissions.	Operational	Negative	<p>Air Quality Action Plan (AQAP) is required to collate all the proposed air quality mitigation measures together, identify any further opportunities to maximise air quality benefits and avoid any unintended consequences.</p> <p>A draft AQAP to be provided and secured by a</p> <p>s.106 agreement, or by Requirement as a control document in the Draft DCO.</p> <p>The AQAP to be a framework for measures to offset the damage cost associated with the operational impacts of the Project.</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.35, 5.36, 5.37 and 5.41 NPPF 180, 192</p>	This matter is included at 2.2.1.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> <a href="#">[REP1-032]</a> . The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers the items requested in the Local Impact Report.

				<p>The draft AQAP to include (but not limited to):</p> <ul style="list-style-type: none"> <li>• Damage cost calculation at that date</li> <li>• Identify and cost measures which are accounted for (embedded mitigation) in the assessments for air quality, health and economics</li> <li>• Proposed mitigation to meet damage cost</li> <li>• A Key focus of the AQAP to be on traffic emissions and improving air quality both within AQMAs and public exposure</li> <li>• Mitigation costs, performance indicators and delivery timescales</li> </ul> <p>and delivery timescales</p> <ul style="list-style-type: none"> <li>• Ongoing engagement requirements for monitoring and reporting to the local authorities.</li> </ul> <p>Authorities to approve the document</p>		
13.1.F	Air Quality and Emissions Mitigation Guidance for Sussex (Sussex Guidance)	Operational	Negative	<p>Sussex Guidance - A package of additional mitigation measures to address local air quality impacts, proportionate to damage costs of the scheme to be provided in accordance with the Sussex Guidance.</p> <p>The proposed mitigation to be provided through an Air Quality Action Plan secured by a s.106 agreement, or a control document by Requirement in the Draft DCO.</p> <p>The AQAP to provide a range of air quality mitigation measures to meet damage cost associated with the Project as outline in 13.1.E</p> <p>above.</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.35, 5.36, 5.37 and 5.42</p> <p>NPPF 180</p>	<p>This matter is included at 2.2.1.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> [<a href="#">REP1-032</a>].</p>

<b>13.1.G</b>	Operational Monitoring and Funding	Operational	Negative	<p>Additional mitigation to provide financial support for monitoring costs to Crawley Borough Council similar to the s106 obligation given to Reigate Council (RBBC).</p> <p>The details of s106 to be agreed with the Applicant but will include:</p> <p>Annual Running Costs</p> <ul style="list-style-type: none"> <li>• Service and Maintenance of AQ Monitoring Instruments</li> </ul> <p>LSO (Local Service Operator) duties</p> <ul style="list-style-type: none"> <li>• Data management Costs</li> <li>• Electricity running costs</li> <li>• Officer time and reporting</li> </ul> <p>Capital Replacement Costs (10 yearly)</p> <ul style="list-style-type: none"> <li>• FIDAS Particulate Monitor (replace 2030,2040, 2050)</li> <li>• NOX analyser (replace 2026 2036, 2046)</li> </ul> <p>Cabinet with aircon</p>	CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38  ANPS 5.23, 5.33  NPPF 180, 192  LAQM Technical Guidance TG22 (Defra)	This matter is included at 2.2.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> <a href="#">[REP1-032]</a> .
<b>13.1.H</b>	Controlled Growth and Surface Access Commitments SACs	Operational	Negative	<p>Additional mitigation within the SAC requiring the Applicant to:</p> <ul style="list-style-type: none"> <li>• Achieve mode share commitments by the commencement of dual runway operations.</li> <li>• Adopt a controlled growth approach similar to that proposed at Luton Airport which would restrict growth until mode share</li> </ul>	CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38  ANPS 5.5, 5.29  NPPF 180	This matter is included at 2.2.2.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> <a href="#">[REP1-032]</a> . In addition, the Applicant refers to its submissions on the principle of managed growth, including by comparison to Luton's Green Controlled Growth approach, in section 5 of its <b>Written Summary of Oral Submissions from Issue Specific Hearing 2: Control Documents / DCO</b> <a href="#">[REP1-057]</a> .

				<p>targets for surface access are met.</p> <p>The additional mitigation measures to be include in a revised SAC document and secured by Requirement 20 in draft DCO.</p> <p>Amendments to the SAC to be approved by the LPA and Highways authority</p>		
13.1.I	CARE Facility Emissions	Operational	Negative	<p>Emissions from the CARE facility will be controlled by environmental permit.</p> <p>Crawley Borough Council requests further information on what steps have been taken to address issues with the existing odour control technology to ensure odour issues will not be a factor in the new facility.</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24,</p> <p>Policy 25 and MSDC</p> <p>Policy DP29 and SA38</p>	<p>This matter is included at 2.2.5.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> <a href="#">[REP1-032]</a>.</p>
13.1.J	Operational Odour Emissions	Operational	Negative	<p>Odour Management and Monitoring Plan (OMMP) Additional measures required to ensure management of aviation fuel and other odour emissions, which has historically been a cause of concern in local communities.</p> <p>To be provided through an Operational Odour Management and Monitoring Plan.</p> <p>To be secured by Requirement as a control document in the Draft DCO.</p> <p>An OMMP or a draft OMMP based on best practice to include (but not limited to):</p> <ul style="list-style-type: none"> <li>• Procedures for recording, reviewing monitoring results and adjusting mitigation.</li> <li>• Data sharing and reporting with LPA.</li> </ul>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.35, 5.36, 5.37</p> <p>NPPF 180</p>	<p>The Applicant has responded to the concern of odour from aviation at Table 4.3.1 of its <b>Relevant Representations Report</b> [REP1-048].</p> <p>The Draft Outline AQAP shared with Local Authorities for comment on 26th March considers odour management and monitoring.</p> <p>Paragraphs 5.8.3 to 5.8.5 of the <b>ES Appendix 5.3.2: Code of Construction Practice</b> [REP1-021] set out odour management procedures.</p>

				<ul style="list-style-type: none"> <li>• Complaints and resolution process</li> <li>• Communications and Engagement Plan sharing with local authorities.</li> <li>• Proposed odour mitigation measures</li> </ul> <p>To be approved by the LPA</p>		
<b>13.1.K</b>	Ultrafine particulate Emissions (UFPs)	Operational	Negative	<p>Additional mitigation to fund further studies on aviation derived ultrafine particles in the local area as part of a package of mitigation measures to address the damage costs associated with the Project.</p> <p>Funding to be provided to lead authority (RBBC) and secured by a s.106 agreement</p> <p>Detailed requirements to be provided by lead authority Reigate and Banstead Council (see Surrey County Council LIR)</p>	<p>CBC Policy ENV12, EP5, HDC Policy 24, Policy 25 and MSDC Policy DP29 and SA38</p> <p>ANPS 5.23, 5.33</p> <p>NPPF 180, 192</p> <p>LAQM Technical Guidance TG22 (Defra)</p>	<p>This matter is included at 2.2.4.6 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council</b> [<a href="#">REP1-032</a>].</p>
<b>13.1.L</b>	Defence to Proceedings in respect of Statutory Nuisance (Article 48)	Operational	Negative	<p>Amendments required to Article 48 of the draft DCO to align with precedents e.g. Article 12 of the Sizewell C (nuclear Generating station) Order 2022 and Model provisions 7 of the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009).</p> <p>Please see Appendix M for the Authorities' proposed amendments to article 48</p>		<p>The Applicant refers to its response to DCO.1.37 in its <b>The Applicant's Response to ExQ1</b> (Doc Ref. 10.16).</p>

#### 4.12 Noise and Vibration

4.12.1 The following table sets out the Applicant's response to matters raised on Noise and Vibration.

**Table 4.8: The Applicant's response to matters raised on noise and vibration**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
14.1A	Noise emissions from construction activities	C	Negative	Code of Construction Practice – Further information and discussion is required on noise control measures within the CoCP.  Acoustic barriers – It is not clear where construction noise barriers are secured	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	Section 5.9 of the <b>ES Statement Code of Construction Practice</b> CoCP [REP1-021] specifies the requirements to adopt BPM including quiet plant and noise barriers. The need to comply with the CoCP is secured by Requirement 7 of Schedule 2 to the <b>Development Consent Order</b> (Doc Ref. 2.1).  The Section 61 applications will allow the local authority to check and confirm this, including the use of appropriate noise barriers, prior to works commencing.
14.1B	Induced ground-borne vibration from construction activities	C	Negative	Code of Construction Practice – Further information and discussion is required on vibration control measures within the CoCP.	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	The potential vibration levels during construction have been modelled and assessed, including from vibratory rollers as requested by local authorities, see <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground</b> (Doc Ref. 10.13) Appendix A - Construction Vibration. No significant effects are predicted. Noting this, the Applicant would be grateful for clarification of what the further information and discussion is that is being requested by the Joint West Sussex Authorities.
14.1C	Changes to road traffic noise levels due to construction traffic	C	Neutral	Construction Traffic Management Plan (CTMP) and Construction Worker Transport Management Plan (CWTMP)	NPSE, CBC Policy ENV11, GAT1 mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	A detailed Construction Traffic Management Plan and Construction Workforce Travel Plan will be submitted for approval and compliance with those is to be secured by Requirements 12 and 13 of the <b>Draft Development Consent Order</b> (Doc Ref.2.1). The ES concludes that with these traffic management plans in place traffic noise changes during construction will not be significant see <b>ES Chapter 14: Noise and Vibration</b> [APP-039].
14.1D	Unsustainable impact of noise from various sources and on various receptors due	O	Negative	The Applicant should consider implementing an approach similar to the Green Controlled Growth Framework offered by London Luton Airport. Under this mechanism noise limits	ANPS, NPPF, CBC Policy ENV11, GAT1,	The Noise Envelope proposed for the Northern Runway Project sets future noise limits within which the airport must operate. The monitoring of compliance is achieved through forecasting and actual noise levels year on year,

	to unsustainable growth of airport operations			<p>and controls are set by the noise envelope and the airports performance is measured and monitored, by an independent group, against a number of noise metrics, controls and limits.</p> <p>Growth at the airport would be contingent on the experience of noise by communities being lower than the baseline, allowing the benefits of new technology to be shared between the airport and communities. Failure to adhere to these agreed limits will result in the cessation of further expansion (i.e. release of aircraft slots) until action has been taken.</p>	<p>mCBLP EP4, GAT1*</p> <p>HDC Policy 24 and MSDC Policy DP29</p>	<p>allowing for correlations to be made and any potential breaches to be identified in advance, and for steps to be taken to avoid them. The second noise envelope limit is lower so growth at the airport is contingent on noise levels reducing and this threshold being met, ensuring the benefit of technological improvements are shared. Further noise envelope limits will be set following a review, taking into account inter alia modernisation of the fleet, and always subject to the maximum cap on commercial air transport movements (ATM) (as defined) set by Requirement 19(1) to the <b>Draft Development Consent Order</b> (Doc Ref. 2.1). Again, this ensures the benefits of fleet modernisation are shared as is appropriate. The proposed Noise Envelope complies with policy and will ensure that the benefits of new technology are shared with the local community. Sharing of the benefits was also demonstrated during consultation on the Noise Envelope, see p166 to p175 of <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]</b>.</p>
14.1E	Air noise (1)	O	Negative	<p>Noise Envelope – the Noise Envelope is not considered fit for purpose as it does not align with policy requirements.</p> <p>It is unclear where operational mitigation measures are secured. An Air Noise Management Plan should be provided where all air noise mitigation/management measures are secured.</p>	<p>ANPS, NPPF, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1*</p> <p>HDC Policy 24 and MSDC Policy DP29</p>	<p>The Applicant believes the Noise Envelope is compliant with policy. See Row 2.13.2.12 of the Crawley Borough Council SoCG. The <b>Draft Development Consent Order</b> (Doc Ref. 2.1) secures the operational mitigation measure that limits use of the northern runway at night. It also includes the annual commercial ATM limit. The noise envelope will be secured through the DCO placing the overall requirement to limit noise during operation of the northern runway. The Noise Insulation Scheme is also secured by the DCO Requirements. Various operational mitigation measures relevant to noise will continue to be secured through the DfT’s regulation of Gatwick Airport as a designated airport. All of the relevant measures are clearly secured by the DCO Requirements, save where secured through DfT’s regulation and not duplicated, and it is not considered there is a need for an additional document to explain this further.</p>



<b>14.1F</b>	Air noise (2)  Insulation Scheme (day effects)	O	Negative	<p><b>Noise Insulation Scheme</b></p> <p>The greatest protection for the daytime effects for the noise insulation scheme is set at 63 dBLAeq.</p> <p>Qualification for the maximum protection should be extended to 60 dBLAeq for the maximum extent of the single mode contour in the worst case year.</p> <p>The offer of grants in 3dB bands by the applicant is supported, but this needs to commence at the 60dB threshold. The maximum qualifying amount at each level ought to be increased and the qualifying works be extended to include insulation and cooling options (see below).</p> <p>The threshold reflects recent DCO decisions and a range of policies.</p> <p>To ensure that this can be reviewed on publication of new science or policy and modified locally, with agreement of the Local Planning Authority, the criteria should be included as a change to the noise insulation scheme as a controlled document.</p>	ANPS, NNPS, NPPF, NPSE	<p>The noise insulation scheme provides noise installation for all properties above Leq 16 hr 54dB. Leq 16 hr 63 dB is chosen for the maximum degree of noise insulation consistent with the requirement to avoid significant adverse effects on health and quality of life about SOAEL. With regards single mode contours and the band adopted see Row 2.17.4.7 of the Horsham District Council SoCG which explains why the scheme is not based on single mode contours.</p> <p><b>The ES Appendix 14.9.10: Noise Insulation Scheme [APP-180]</b> provides further details of the scheme and revised amounts to be offered in each noise band are added to the revised Scheme submitted at Deadline 4. The DCO will fix the Noise Insulation Scheme to be implemented for the Northern Runway Project. It includes a requirement to review the payments limits, as applicable, every three years. This will not account for local policy changes, should those materialise, as that would not be an acceptable position for the airport and the need for certainty of operations, and it would also not be appropriate in the context of a designated airport of national significance which performs a vital economic function for the UK.</p>
<b>14.1G</b>	Air Noise (3)  Control of night effects – based on averaging metrics	O	Negative	<p>The threshold at which the maximum qualifying amount for insulation and cooling should be extended from the 55 LAeq to 48 LAeq for night (based on SoNA re-analysis).</p> <p>A tiered grant scheme below this level to the WHO 40 LAeq is recommended.</p>	NPSE, NPPF, NNPS,	<p>Leq 8 hr night 55dB is chosen for the maximum degree of noise insulation consistent with the requirement to avoid significant adverse effects on health and quality of life above SOAEL. This defines the Inner Zone. The Outer Zone provides noise insulation for properties above Leq 16 hr day 54dB. The 2032 Slower Transition Fleet Leq 16 hr day 54dB contour that forms the outer extent of the Outer Zone is well aligned with the Leq 8 hr</p>

				<p>To ensure that this can be reviewed on publication of new science or policy and modified locally, with agreement of the Local Planning Authority, the criteria should be included as a change to the noise insulation scheme as a controlled document.</p>		<p>night 48dB contour, so that properties above Leq 8 hr night 48dB will also be offered noise insulation. This can be seen by comparing ES Figures 14.9.1 with 14.9.9 or in the online Air Noise viewer through which Local Authorities were given access to all the ES contours since March 2023 and the public were given access with publication of the ES.</p> <p>It is not considered appropriate to provide refrigerated cooling, so the scheme includes fresh air ventilation to allow windows to remain closed in warm weather. The <b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note [REP2-031]</b> provides further details.</p> <p>The Noise Insulation Scheme will not account for local policy changes, should those materialise, as that would not be an acceptable position for the airport and the need for certainty of operations, and it would also not be appropriate in the context of a designated airport of national significance which performs a vital economic function for the UK.</p>
14.1H	Air noise (4)  Additional Awakenings	O	Negative	<p>In addition to consideration of the averaging metrics additional awakenings need to be considered as a primary metrics.</p> <p>The maximum level of insulation and home adaptation for cooling needs to be set at one additional awakening for the total impact of all flights not solely those that are said to be from the NRP.</p> <p>There are options to include this within the DCO as a requirement or as an explicit statement within the control document. However, it should not be capable of being removed without proper scrutiny and for that reason it is considered that as minimum this should be as part of a requirement.</p>	NPSE, NPPF, NNPS,	<p>There is no requirement in government or CAA guidance to mitigate aircraft noise with regards to additional awakenings. However, the ES contains a physiological awakenings study in <b>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</b> which was prepared in response to the UK Health Security Agency requesting it. The study shows that the northern runway project will not create more than one additional awakening in any location. This is primarily a result of the fact that the project facilitates only a 10% increase in flight numbers across the eight hour night period.</p> <p>The comment suggests the northern runway noise insulation scheme should also provide insulation against flights from other airports. These flights all not in control of the applicant, nor does the applicant have forecasts of future operations from other airports and it is not appropriate or necessary for the northern runway NIS to address noise from aircraft using other airports.</p>

14.1I	Air Noise (5)  Secondary health effects including overheating	O	Negative	<p>Any buildings qualifying for noise insulation shall be assessed for overheating. Where there is a risk of overheating then the noise insulation scheme shall include measures to tackle overheating (Crawley BC emerging local plan has an appropriate cooling hierarchy to consider this against but as a retro fit there may be limitations to this).</p> <p>This should be included in a control document.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>The reference to limitations as to what can be done in a retrofit situation is noted. It is because of this that the noise insulation scheme cannot address an existing overheating issue in a particular property. Instead, the Noise Insulation Scheme will provide ventilation to allow fresh air flow into the relevant rooms so as to allow windows to remain closed in warmer weather. Details of the minimum airflow that will be provided are given in the <b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> <a href="#">[REP2-031]</a>.</p>
14.1J	Air Noise (6)  Management of costs associated with noise insulation scheme and cooling	O	Negative	<p>Where noise insulation or cooling or both are applied to a property, the Applicant shall be responsible for the initial capital, running costs, maintenance costs and future replacement costs.</p> <p>The principles can be included within the DCO as a requirement and the detail referred to within the</p> <p>noise insulation control document and subject to periodic review and revision with approval from LPA.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>Details of the acoustic ventilators that will be provided are given in the <b>ES Appendix 14.9.10: Noise Insulation Scheme Update Note</b> <a href="#">[REP2-031]</a>. The scheme includes for the full cost of installation, but not running or maintenance costs. Running costs have been discussed with the local authorities through the noise topic working group and are very small, typically similar to an LED light bulb ie approximately 5 Watts. The units can operate in passive mode when they draw no power. Acoustic ventilators have low maintenance requirements and will also be covered by manufacturers guarantees.</p>
14.1K	Air Noise (7)  Post installation assessment of noise insulation schemes.	O	Negative	<p>Ongoing scheme to determine the effectiveness, durability and satisfaction with noise insulation, ventilation and including cooling scheme. This is to identify continuous improvement and ensure that all adverse health effects are being avoided.</p> <p>This should be part of the noise insulation scheme improvement feedback loop</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>The Gatwick Airport Noise Action Plan includes a commitment to review the noise insulation scheme within the life of the noise action plan. The current noise insulation scheme was last reviewed under this commitment in 2018. That review included consultation with the local authorities, a survey of all homeowners who had taken up the scheme, and benchmarking against other schemes. The noise insulation scheme will be amended to include an audit of the Scheme performance.</p>
14.1L	Air Noise (8)	Pre-commencement	Negative	<p>Article 18 (5) ground noise must be based on modelled predictive ground and air noise</p>	NPSE	<p>Requirement 18 of the <b>Development Consent Order</b> (Doc Ref. 2.1) gives the commitment to measure noise levels during operation if necessary and requested by people who feel they should be eligible for noise</p>

	Commencement of Noise Insulation Scheme			<p>effects in worst case year with qualifying criteria referred to above.</p> <p>the option for monitoring should remain.</p>		<p>insulation due to ground noise. Properties eligible for noise installation due to ground noise based on prediction are identified in the <b>ES Chapter 14: Noise and Vibration [APP-039]</b> and are further clarified in <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground</b> (Doc Ref. 10.13) Appendix B - Ground Noise Slower Transition Fleet Assessment .</p>
<b>14.1M</b>	<p>Noise Envelope</p> <p>Reflect policy objectives.</p>	O	Negative	<p>The noise envelope needs to have a clear objective that in accordance with UK policy: “The benefits of future technological improvements with regards to noise will be shared fairly between the industry and local communities”.</p> <p>This needs to be stated explicitly within Article 15 of the DCO or this is inserted into ES Appendix 14.9.7:</p> <p>The Noise Envelope [APP-177]. The proposals for growth and mitigation need to then be reviewed in light of this.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>The noise objective of the Noise Envelope was first stated in the PEIR for consultation in autumn 2021. Having received no suggested changes that objective is stated in Section 4 of the Noise Envelope, and is consistent with government policy. Section 3 of the Noise Envelope expands on government policy including the requirement to share the benefits of future technology.</p> <p>As noted above sharing of the benefits of new technology has been demonstrated during consultation on the noise envelope, and is secured by the noise envelope.</p>
<b>14.1N</b>	<p>Noise Envelope</p> <p>Use of noise metric contours and areas.</p>	O	Negative	<p>The noise envelope must be based on noise metric contours and the area to provide certainty.</p> <p>To ensure the envelope serves its purpose the noise contours must be for average metrics as stated and event metrics (including one additional awakening, N60 and N65).</p> <p>This can be achieved by requirement in the DCO and an update to the noise envelope document.</p>	<p>NPSE, ANPS, CAP</p>	<p>Noted, the Noise Envelope is based on noise contour areas so as to provide certainty.</p> <p>The chosen noise metrics are Leq 16 hour for the daytime and Leq 8 hour for the night time because these are the primary noise metrics required in government guidance, including CAA CAP1616. The pros and cons of additional secondary noise metrics such as those listed were discussed with the Noise Envelope Group and Noise Topic working Group in detail. See <b>ES Appendix 14.9.5 Air Noise Envelope Background [APP-175]</b>, <b>ES Appendix 14.9.7: The Noise Envelope [APP-177]</b> and <b>ES Appendix 14.9.8 Noise Envelope Group Output Report [APP-178]</b> and <b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023]</b>.</p>

<b>14.1O</b>	Noise Envelope  Limit metrics across all periods to ensure control.	O	Negative	A change is required to the Noise Envelope to include appropriate limits across all times of the year and during periods of the day.  It is recommended that this is retained within a requirement within the DCO and restated within the control document.	ANPS, NPSE	The Applicant does not consider this is necessary. Please see <b>Statement of Common Ground Between Gatwick Airport Limited and Crawley Borough Council</b> [ <a href="#">REP1-032</a> ] paragraph 2.13.4.7 for more information on why that is the case. In summary, the limits are set for the whole 24 hour period by using 16 hour day and 8 hour night limits, and for the summer season which is the noisiest time of year when noise impacts are greatest. whole 24 hour period by using 16 hour day and 8 hour night limits, and for the summer season which is the noisiest time of year when noise impacts are greatest.
<b>14.1P</b>	Noise Envelope  Restatement of maximum limits of night noise schemes within noise envelope.	O	Negative	The interface of the noise envelope with other schemes such as the night noise scheme must be clearly stated. The existing values, as they are used in the future predictions, must be adopted and explicitly stated within the noise envelope. The values can reduce with the national scheme but cannot increase.  The noise envelope should seek to reduce the overall exposure during the 8 hour night period.  Statement as a requirement in the DCO and a change to the noise envelope.	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	Please see response to 14.1E above.  The Noise Envelope as proposed provides limits for the 8 hour night period, that will ensure these noise levels reduce. The DCO also secures that the northern runway will not be used routinely between the hours of 23:00 – 06:00.
<b>14.1Q</b>	Noise Envelope  Updating where new evidence.	O	Negative	At present the noise envelope (and noise insulation) scheme is static. It needs to adapt where evidence emerges that effects occur at lower thresholds or where new metrics are identified as explaining an adverse effect.  A requirement stating this principle needs to be included stating the time in which the two schemes will be updated and the approval process and timescale. The detail can be included within the control document.	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	The Noise Envelope provides fixed noise limits in order to provide certainty over future noise levels for the communities affected and certainty to the airport so that it can plan and manage its operations accordingly. In order that the noise envelope remains relevant it includes a process through which the noise limits will be reviewed and where appropriate, based upon past performance, ATM and fleet transition forecasts, any changes to aircraft routings, relevant changes to government policy, and noise modelling forecasts.

						<p>It would not be appropriate or reasonable to commit to reduce these noise levels as a result of any future evidence that may emerge on noise effects in the future, as this would result in a level of operational uncertainty which is not acceptable to the Applicant. However, GAL is obliged to keep its Noise Action Plan up to date and any future reviews will necessarily take account of circumstances at that time.</p> <p>With regards the review of the Noise Insulation Scheme please see 14.1K above.</p>
<b>14.1R</b>	Noise Envelope  All metrics to be complied with	O	Negative	<p>The noise envelope must ensure that improvement in one metric does not result in a deterioration in another.</p> <p>Explicit requirement within the Noise Envelope Control Document</p>	NPSE, CBC Policy ENV11, GAT1, mCBLP  EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	<p>The Noise Envelope as proposed places limits on noise in the 16 hour day and in the 8 hour night service to cover the 24 hour period with two metrics. Because the two metrics cover different time periods there is no duplication and both limits must be met. The issue of actions being taken to improve one metric at the expense of another could arise if duplicate metrics were used for the same time period, as has been suggested by others, but this is avoided by the proposed scheme.</p>
<b>14.1S</b>	Noise Envelope  Use central case fleet.	O	Negative	<p>The noise envelope shall be based on central case fleet not slow transition fleet.</p> <p>This change shall be reflected in the DCO and the control document for the noise envelope.</p>	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	<p>Please see Row 2.13.2.12 of the <b>Statement of Common Ground Between Gatwick Airport Limited and Crawley Borough Council</b> [<a href="#">REP1-032</a>] In addition, the Applicant recognises that the Central Case Fleet forecast was undertaken in 2019, based on industry knowledge at that time, such as airline investment and fleet procurement plans etc. It is recognised that in the 4 years since the situation has changed, in particular as a result of the COVID-19 Pandemic. The Applicant is now furnished with more recent data of the envisaged fleet transition, derived from the summer 2023, and it will as soon possible be submitting updated information on the 'Central Case'. This more recent fleet forecast based on 2023 data shows on a general basis that fleet transition has slowed by approximately two years by comparison to</p>

						<p>the Central Case derived from 2019 data. be submitting updated information on the 'Central Case'. This more recent fleet forecast based on 2023 data shows on a general basis that fleet transition has slowed by approximately two years by comparison to the Central Case derived from 2019 data.</p> <p>Whilst an updated Central Case will be reported as soon as possible to ensure the ES is based on the most recent data and forecasting, the Slower Transition Fleet forecast will be unaffected because it continues to represent a rate of fleet transition that could occur due to possible events that could slow down the transition.</p> <p>The conclusions in the ES on likely significant effects and the Noise Insulation Scheme proposed are based on this Slower Transition Fleet, and as such those will not change. The information submitted to date will continue to represent the worst-case impacts of the Project which are required to be mitigated for.</p>
<b>14.1T</b>	Noise Envelope  No increase in noise contours	O	Negative	<p>The noise envelope contour must not increase with any successive envelope period.</p> <p>This needs to be set out within a requirement and reflected within the control document.</p>	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	<p>The reasons why the Noise Envelope must have a review process through which the limits may be decreased or increased is explained in Section 6.2 of the <b>ES Appendix 14.9.7: The Noise Envelope Document</b> <a href="#">[APP-177]</a>.</p> <p>Reviews of the noise envelope limits will be prepared on behalf of GAL by a Specialist Aviation Forecaster, and will be based upon past performance, ATM and fleet transition forecasts, any changes to aircraft routings, relevant changes to government policy, and noise modelling forecasts. Extraordinary reviews are also able to submitted to the Secretary of State to take into account changes required as a consequence of approved airspace change proposals or the incorporation (including the proposed incorporation) of aircraft which provide for significant carbon emissions savings into the airline fleets operating from the airport which aligns with government policy in relation to carbon emissions reduction and climate change.</p>

						Please see also Row 2.13.3.3 of <b>Statement of Common Ground Between Gatwick Airport Limited and Crawley Borough Council</b> [ <a href="#">REP1-032</a> ].
<b>14.1U</b>	Noise Envelope Management Systems to ensure compliance	O	Negative	<p>It is proposed to forecast the year ahead but there is no management system to ensure that the assumptions in the forecast are effectively applied. This leads to uncertainty. A system needs to be established to monitor in year performance to allow corrective action to prevent exceedances.</p> <p>This can be achieved through a requirement and a change in the noise envelope documentation.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>This is fundamentally not agreed with and represents a misunderstanding of how the noise envelope will operate. Forecast for the future 5 year period will be undertaken year on year. Actual noise monitoring and results will be correlated with this. This will ensure it can be seen how the two align with one another, to improve accuracy and to ensure a comprehensive system of control. It is also the most contemporaneous manner of monitoring that can be achieved, taking into account the nature of the data and the need for this to be produced and analysed. The Applicant will develop this management system prior to the noise envelope coming into force using its experience of numerous management systems within the airport, including managing compliance with the night restrictions. In order to ensure the smooth operation of the system it is anticipated it will be developed before the northern runway operations commence and the Applicant will carry out the noise contour forecasting and provide the first Annual Monitoring and Forecasting Report in the year before commencement of dual runway operations. Further information will be added to the <b>ES Appendix 14.9.7: The Noise Envelope</b> [<a href="#">APP-177</a>] to confirm this approach.</p>
<b>14.1V</b>	Noise Envelope Fines	O	Negative	<p>An automatic fine should be levied on the airport operator for an exceedance of any of the noise metrics of the noise envelope and any failure by the airport without reasonable excuse to produce reports or information.</p> <p>This should become payable upon any exceedance and may be subject to a progressively increasing scale. The fine</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>The procedures to be followed if the noise envelope limits are breached or are forecasted to be breached are described in Section 7 of the Noise Envelope. They require the airport to draw up an action plan to return to being within compliance, as well as to investigate the reasons for the non compliance. The measures required may involve capacity management and ultimately a reduction in the rate of capacity / slots being released. This would be the penalty that the airport operator would suffer in the event of a non compliance as per paragraph</p>



				<p>should be calculated on a basis to be determined but such so as to deter a breach.</p> <p>All monies collected should be paid directly to those affected</p>		<p>7.3.1 of the <b>ES Appendix 14.9.7: The Noise Envelope Document</b> [<a href="#">APP-177</a>].</p>
<b>14.1W</b>	Noise Envelope: Enforcement Model	O	Negative	<p>The oversight, monitoring and enforcement model for the noise envelope was not discussed in any detail with the local authorities.</p> <p>An appropriate role needs to be defined for the local authorities and the Luton Green Controlled Growth Framework’s proposal for a scrutiny board is supported with the option to escalate matters to the LPA.</p> <p>All scrutiny and oversight of the noise envelope and all action in relation to the DCO, including the cost of any specialist advice, is to be funded by the applicant. This needs to be a requirement within the DCO.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>This issue was discussed with the Noise Envelope Group and Noise Topic Working Group, with conflicting views between stakeholders and no agreement reached. Please see <b>Statement of Common Ground Between Gatwick Airport Limited and Crawley Borough Council</b> [<a href="#">REP1-032</a>] Crawley Borough Council SOCG paragraph 2.13.4.2 and 2.13.4.9.</p> <p>The CAA is considered the appropriate body to independently review and verify the noise monitoring and forecasting information, prior to publication to wider stakeholders and the public who at that point may also scrutinise and seek to rely upon the Planning Act 2008 enforcement provisions if appropriate.</p>
<b>14.1X</b>	Compensation	O	Negative	<p>The applicant to provide annual compensation to everyone within the 54 LAeq 16h actual contour. The amounts, increase with inflation and amount awarded with exposure to be subject to further discussion but the principles need to be stated within a requirement.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>This is not something that the Local Authorities have discussed with the Applicant. There are no proposals for any financial compensation to be paid to individuals because they are affected by noise from the operation of airport.</p> <p>The Noise Insulation Scheme will offer mitigation of impacts to all properties above LAeq 16hr 54dB, as is appropriate and within the scope of the relevant legal tests.</p>
<b>14.1Y</b>	Airport ground- based activity noise emissions (1)	O	Negative	<p>Noise barrier/ bund – It is not clear where barriers and bunds that are required to mitigate ground noise are secured.</p> <p>Noise Insulation Scheme – Further information and discussion is required the noise insulation scheme</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p>	<p>The ground noise bund and barrier are described in Section 5.3.10 and shown in Figure 49, 50 and 51 in <b>Design and Access Statement – Volume 1</b> [<a href="#">REP2-032</a>] and within the <b>Design and Access Statement Appendix 1 – Design Principles</b> [<a href="#">REP2-037</a>], with which compliance is secured through DCO requirement 4.</p>

					Policy 24 and MSDC Policy DP29	<b>ES Appendix 14.9.10 The Noise Insulation Scheme Update Note</b> [REP2-031] provides further details of the scheme, and how it will be refined following the comments received.refined following the comments received.
<b>14.1Z</b>	Ground noise (2)  Ground noise modelling	O	Negative	<p>The assessment of ground noise emissions is limited. In order to improve understanding of effects further work is required that includes production of ground noise contour maps. These should as a minimum be for LAeqT and LAm<sub>ax</sub> for baseline 2019 year and then assessment years (2029,2032, 2038 and 2047).</p> <p>Slow transition fleet needs to be modelled alongside the central case fleet.</p> <p>Modelling needs to be completed under single mode operation to identify locations where there is greatest effect.</p> <p>This can be achieved as a change to the application. All ground noise modelling should inform a Ground Noise Management Plan.</p>	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC  Policy 24 and MSDC Policy DP29	<p>The Applicant has explained in the noise topic working group how ground noise is assessed in terms of not just the level of ground noise as depicted by a contour, but the change in ground noise and the extent to which it exceeds ambient noise in the area, and hence why ground noise contours may be misleading if considered in isolation.</p> <p>An assessment of ground noise for the Slower Transition Fleet has been completed and is reported with the response in <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground</b> (Doc Ref. 10.13.2), Appendix B - Ground Noise Fleet Assessment which includes ground noise contours for the worst case year, noting these contours are only part of the assessment process.</p> <p>The ground noise modelling is carried out separately for easterly and westerly mode operations because of the difference in taxing patterns, wind effects and ambient noise conditions at the relevant receptors.</p> <p>The Applicant has also provided further details on engine ground running and assessment results in Supporting Noise and Vibration Technical Notes to Statements of Common Ground – Appendix E: Ground Noise Engine Ground Runs (Doc Ref. 10.13).</p>
<b>14.1AA</b>	Ground noise (3)  Ground noise management plan	O	Negative	<p>A Ground Noise Management Plan should be provided where all ground noise mitigation/ management measures are secured.</p> <p>Together with the modelling this should be used as the basis of options appraisal for continuing reduction of ground noise</p>	NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC	<p><b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground – Appendix E: Ground Noise Engine Ground Runs</b> (Doc Ref. 10.13) provides information not only on engine ground runs, but also includes a section on complaints due to ground noise. In 10 years from the beginning of 2010 to the end of 2019, there was a total of 16 recorded noise complaints linked with ground noise. The airport has</p>

				<p>impacts, for the consideration of new operational practices or as a means of investigating and remedying ground noise complaint.</p> <p>A baseline noise contour should be set similar to the noise envelope and the airport seek to reduce its impact.</p> <p>This can be achieved through a new control document.</p>	<p>Policy 24 and MSDC Policy DP29</p>	<p>established procedures for managing ground noise including engine ground runs, and extensive noise mitigation in the form of noise bunds and barriers around the northern boundary of the airport. Whilst complaints statistics can be misleading, they suggest ground noise is not a major issue for the local community. The ES has predicted increases in ground noise with generally minor impacts that do not require new operating procedures to be adopted so there is no need for a ground noise management plan.</p>
<b>14.1AB</b>	Ground noise (4) Mitigation hierarchy	O	Negative	<p>Clear adoption of balanced approach with mitigation at source; airfield asset limitations; barriers; noise insulation for properties.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p> <p>Policy 24 and MSDC Policy DP29</p>	<p>The approach to mitigation of ground noise is described in section 14.8 of the <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> including the preference for noise mitigation at source and within the airfield.</p>
<b>14.1AC</b>	Changes to road traffic noise levels due to operational traffic	O	Neutral	<p>Barriers, traffic management and speed controls – It is not clear where measures to mitigate operational traffic noise are secured. In the first instance, more information is required.</p>	<p>NPSNN, NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1*</p> <p>HDC Policy 24 and MSDC Policy DP29</p>	<p>Please see response to comment NV13 above.</p>
<b>14.1AD</b>	Noise emissions from fixed plant (1)	O	Neutral	<p>Acoustic design of plant and fixed noise sources – It is not clear where measures to mitigate fixed plant noise are secured.</p>	<p>NPSE, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1* HDC</p>	<p>Please see response to comment NV15 above.</p>

					Policy 24 and MSDC Policy DP29	
<b>14.1AE</b>	Noise emissions from fixed plant (2)	O	Negative	The standards for BS4142 need to be clarified. The rated sound level at receiver from fixed plant ought to be below background sound level in accordance with Planning Noise Advice Document: Sussex Ltd. This is related to operational requirements therefore, in the absence of a design code for future plant as a control document, this could be addressed through a requirement.	NPSE, CBC Policy, mCBLP EP 4, PNADS 2023	Please see response to comment NV15 above.
<b>14.1AF</b>	Increased use of WIZAD (Route 9) and associated noise and disturbance perceived by receptors currently unaffected by overflight.	O	Negative	Maintain the use of WIZAD as tactical offload route only.  Controls restricting all night time use (23:00-07:00) and day time use beyond emergency use only, in line with current protocol are required. If any increase in use is proposed a full assessment of impacts must be carried out.	ANPS, NPPF, CBC Policy ENV11, GAT1, mCBLP EP4, GAT1*  HDC Policy 24 and MSDC Policy DP29	No new flight paths are proposed as part of the Project. WIZAD is an existing Standard Instrument Departure (SID) Route. The UK Aeronautical Information Publication (AIP) sets out the rules for how the route may be used and is the source for the information as it is published and available to pilots.  The UK AIP explains that the WIZAD Standard Instrument Departure (SID) is a tactical routing allocated by air traffic control to alleviate airspace congestion and may be offered at a late stage of taxiing to aircraft normally allocated MIMFO (Route 4) SID between 0700 and 2300. The WIZAD SID should not be used for flight planning purposes.  Under the baseline and the development, 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.  The <b>Statement of Common Ground Between Gatwick Airport Limited and Horsham District Council</b> <a href="#">[REP1-040]</a> paragraph 2.17.2.3 includes detail of the results of noise modelling reported in the ES and the accompanying online air noise viewer showing the impact of the northern runway project will not be significant in Horsham.

#### 4.13 Climate Change

4.13.1 There were no positive or negative climate related impacts identified for the construction phase, only ‘insignificant’ neutral impacts which with adequate mitigation measures implemented would be sufficient in mitigating these impacts.

4.13.2 Regarding the operational phase, there were no positive or neutral climate impacts identified, but there were several negative impacts, in the form of climate-related risks. Of the identified negative impacts, none were deemed significant, and appropriate mitigation measures were identified.

#### 4.14 Greenhouse Gases

4.14.1 The following table sets out the Applicant’s response to matters raised on Greenhouse Gases.

**Table 4.9: The Applicant’s response to matters raised on greenhouse gases**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant’s Response
16.1a	Unaccounted carbon emissions in the whole life carbon assessment have the potential to result in the underreporting of the Proposed Development’s impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.	C and O	Negative	Under the IEMA GHG Assessment methodology used in the ES [APP- 041], the Applicant is required to update the carbon assessment and assess all material emissions over the whole life of the proposed Scheme. If an exclusion is undertaken, this must be evidenced and be <1% of total emissions, and where all such exclusions total a maximum of 5%.	CBC 2030 Local Plan (2015-2030): Policy ENV6 and GAT1.	<p>Within Section 2.11.2.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council</b> [REP1-033] it is noted that the assessment methodology has sought to develop a methodology to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of 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.</p> <p>However, the approach adopted is based on the assessment process which contextualises emissions</p>

					<p>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 the <b>ES Chapter 16: Greenhouse Gases</b> [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 <a href="https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes">https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes</a> ) 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>
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<b>16.1b</b>	The unsustainable growth of airport operations may result in significant adverse impacts to the climate.	C and O	Negative	<p>To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant’s construction activities, airport operations and surface access transportation.</p> <p>Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism.</p> <p>In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be :</p>	CBC 2030 Local Plan (2015-2030): Policy ENV6 and GAT1.	<p>The Climate Change Act places a duty on the Secretary of State to prepare “such proposals and policies as the Secretary of State considers will enable the carbon budgets that have been set under this Act to be met.” (Section 13).</p> <p>That duty lies with the Secretary of State and it is apparent that the Government has put in place a clear framework of policy to ensure that the Government’s duty and commitment is met. The Jet Zero Strategy forms part of that policy framework and, within it, the Government makes clear that its modelling demonstrates that the commitment can be met without demand management – i.e. without constraining the growth of airports. That conclusion is reached in the light of the acknowledged importance of aviation to the UK and the critical importance of the Government supporting growth in the aviation sector, whilst meeting its binding carbon reduction targets.</p> <p>The JZS is also clear that the Government is monitoring the position closely and will take further measures if necessary, if it becomes apparent that the trajectory of aviation emissions is not being achieved. In these circumstances, a control of the type proposed by the local authority in this case would cut across the balance being struck by government and would not meet the relevant tests of necessity or appropriateness.</p> <p>At Gatwick today, through its Airport Carbon Accreditation Level 4+, the Applicant buys offsets covering residual Scope 1 and 2 GHG emissions (as well as business travel).</p> <p>In order for the Applicant to maintain its ACA certification, any offsets – removal and/or reduction – must be bought from schemes accredited by the ACA.</p> <p>With a view to achieving Net Zero for Scope 1 and 2 GHG emissions by 2030 (under both its existing Decade of Change commitments, and the equivalent under the Carbon Action Plan as part of the Project), the Applicant</p>
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				<p>additional in that would not have occurred in the absence of the project monitored, reported and verified permanent and irreversible</p> <p>without leakage in that they don't increase emissions outside of the proposed development</p> <p>Have a robust accounting system to avoid double counting and</p> <p>Be without negative environmental or social externalities.</p>		<p>is in the process of transitioning from use of carbon reduction offsets to carbon removal offsets instead (as the use of carbon removal offsets would not meet the definition of Net Zero). For 2023, GAL purchased 25% removal offsets and 75% reduction offsets.</p> <p>Furthermore, the Applicant is investigating the development of a local removal project, independent of the Project. Any such project will need to be accredited by the ACA.</p>
<b>16.1c</b>	Unaccounted WTT emissions have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified	O	Negative	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES [APP-041].</p> <p>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions and where all such exclusions total a maximum of 5%.</p>	<p>CBC 2030 Local Plan (2015-2030):</p> <p>Policy GAT 1 encourages the efficient operation</p>	See 16.1a above.
<b>16.1d</b>	Unaccounted WTT emissions have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the	C	Negative	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES [Chapter 16 of the ES, APP-041].</p> <p>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are &lt;1% of total emissions</p>	<p>CBC 2030 Local Plan (2015-2030):</p> <p>Policy ENV6.</p>	See 16.1a above.



	government meeting its net zero targets cannot be identified.			and where all such exclusions total a maximum of 5%.		
<b>16.1e</b>	Shipping emissions during the transportation of construction materials have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.	C	Negative	The Applicant needs to update the transport assessment in compliance with the RICS methodology quoted in the ES to ensure shipping transport emissions are accounted for. This can then be used to inform appropriate transport efficiency mitigation measures as part of the CAP under Appendix 5.4.2 in the ES [APP-091].	CBC 2030 Local Plan (2015-2030): Policy ENV6	At the stage the likely geographic source location for materials is not known. The assessment of GHG has assumed UK sourcing of materials with an average transport distance based on RICS guidance, considering an appropriate estimate of those materials sourced locally and those sourced nationally. With regards to quantification of impacts from construction of infrastructure - the majority of emissions are large quantities of bulk materials (aggregate, concrete etc) which will predominantly be sourced locally. While it might be expected some small portion (by mass) may be sourced outside the UK this is likely to be minor in comparison to the large quantities of bulk materials. Any underestimation from would, therefore, be small and unlikely to be material to the conclusions of the assessment. The quantification of impacts from construction of buildings is based on typical embodied carbon metrics per m2 of floor area, within which a proportion of local, national, and international sourcing is already included. Assumptions used within the construction assessment are set out in <b>ES Appendix 16.9.1: Assessment of Construction Greenhouse Gas Emission</b> [APP-191]. The mitigation set out in the <b>ES Appendix 5.4.2: Carbon Action Plan</b> [APP-091], 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 transportation and shipping as part of their wider carbon management approach.
<b>16.1f</b>	If construction emissions are not managed in line with PAS 2080:2023 they	C	Negative	One of PAS2080:2023's foundational principles is that the earliest you implement it during the design process, the more likely it is that carbon can be reduced in the design.	CBC 2030 Local Plan (2015-2030):	Part of the commitment in the CAP is that the Applicant commits to being PAS 2080: 2023 certified as the asset owner. This means that the design stages will be covered by the approach set out in PAS 2080.

	<p>have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.</p>			<p>Hence, in alignment with this principle, the Applicant should implement PAS 2080:2023 as early as possible within the design process to maximise carbon-saving opportunities.</p>	<p>Policy ENV6.</p>	<p>In response to these comments, the Applicant has submitted the <b>Construction Carbon Management Strategy</b> (Doc Ref. 10.18) at Deadline 3 which sets out the work already undertaken and that planned to embed its approach to low carbon in construction into all relevant actions.</p>
<p><b>16.1g</b></p>	<p>If the Applicant does not provide infrastructure or services to help decarbonise surface transport emissions it may have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified</p>	<p>O</p>	<p>Negative</p>	<p>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure. Additionally, to support this movement, the Applicant should support a Green Bus Programme in Mid Sussex, including supporting an expansion of the network of hydrogen buses used in the Gatwick/Crawley area into Mid Sussex with accompanying infrastructure.</p>	<p>CBC 2030 Local Plan (2015-2030): Policy IN3: Development and Requirements for Sustainable Transport</p>	<p>The <b>Transport Assessment</b> [AS-079] and the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> [APP-090] set out how the Applicant's commitments to sustainable travel are secured under the DCO. Achieving the modes shares set out will significantly reduce surface transport emissions. We are continuing to invest in charging infrastructure for passengers and staff within a wider strategy for EVs on the campus as part of our Decade of Change programme independent of the DCO. This includes a partnership with Gridserve to provide an electric vehicle charging forecourt on airport, completed in early 2024. Our passenger valet parking service also offers an EV charging service. For operational vehicles there is a programme underway to deliver the Applicant's and third party airfield EV charging requirements. The Applicant has invested or pledged over £1m to Metrobus in hydrogen buses for the local network serving the airport and continues to support the transition to ultra low or zero emission vehicles in local bus services and in the Applicant's own surface transport fleet. This includes the successful ZEBRA 2 grant funding bid that secured over £10m of matched Government funding to extend the Metrobus fleet of hydrogen buses across West Sussex and Surrey</p>

						Decarbonisation of all surface transport is a matter for Government policy and the Applicant cannot mandate that all surface access journeys are by zero emission vehicles ahead of meeting those policy targets.
<b>16.1h</b>	If the Applicant fails, the BREEAM Excellent (for water and energy credits) targets it may have adverse consequences on the environment.	C	Negative	If concluded technically and financially viable in the cost-benefit study, the Councils expect that the Applicant will implement BREEAM Excellent certification (for water and energy credits) into the Project. This standard should be specified by requirement or set out clearly within a control document.	CBC Local Plan policy ENV6 and the draft CBLP.	Sustainability accreditation schemes are one way of achieving sustainable outcomes in construction. Different schemes are available for different types of assets and covering different sustainability issues. The Applicant will consider whether the use of sustainability accreditation schemes will result in sustainability outcomes that may otherwise not be achieved.

#### 4.15 Traffic and Transport

4.15.1 The following table sets out the Applicant's response to matters raised on Traffic and Transport.

**Table 4.10: The Applicant's response to matters raised on traffic and transport**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
<b>17.1A</b>	Impact on the local transport network and local community due to additional road traffic associated with construction activity. Potential impacts include increased pedestrian delay, impacts on pedestrian amenity, impacts on the perception of safety from other road users, driver delay,	C	Negative	Ultimately, subject to approval of the DCO, a full Construction Management Plan will be required, that sets out the timescales and intended means of constructing the Project and any necessary traffic management and measures to mitigate and reduce the impact of construction on the transport network. This is required to include firm commitments and specific details as to what is proposed.  The Outline Construction Traffic Management Plan (APP-085) lacks detail and further clarification is required from the Applicant at examination stage. Matters for clarification include when the contingency routes will be used and further clarification	Airports National Policy Statement, in paragraph 5.80, requires mitigation measures at construction stage and that they, "... draw on best practice from other major construction schemes...".  NPPF, paragraph 110b (requires the provision of safe and suitable access) and d (that	A detailed Construction Traffic Management Plan and Construction Workforce Travel Plan will be submitted to Crawley Borough Council for approval (in consultation with other West Sussex County Council, Surrey County Council and National Highways on matters related to their function) pursuant to Requirements 12 and 13 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) . Each detailed plan must be substantially in accordance with its respective outline plan.  As set out in Section 6.3: Contingency Access of the <b>ES Appendix 5.3.2: Code of Construction Practice Annex 3 – Outline Construction Traffic Management Plan [APP-085]</b> , Junction 10 of the M23 could be used as an alternative access as a contingency to the primary access route. A23 London Road, A23 Brighton Road and the A2011 are other significant roads that provide connections to the airport for the construction traffic

	and road safety implications.			<p>as to the detail of certain measures proposed in the CTMP.</p> <p>Ultimately, subject to approval of the DCO, a full Construction Workforce Travel Plan will be required that expands upon the high-level measures currently put forward by the Applicant (in APP- 084). A Travel Plan, specifically aimed at mitigating the transport impacts of construction workers travel throughout the construction period, is needed. The current outline document submitted by the Applicant is high level and clarification is required, at examination, in relation to the specific detail of certain mitigation measures. This is required to include firm commitments and specific details as to what is proposed.</p> <p>To be secured via requirement.</p>	<p>any highway safety impacts can be cost effectively mitigated to an acceptable degree)</p> <p>Local Plan Policy IN3 (Development and Requirements for Sustainable Travel) notes that,</p> <p>“Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety.”</p>	<p>from the north and south, in the event that the primary access is impaired. This contingency route is shown in yellow on Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access.</p> <p>The CTMP issued post DCO approval will provide the following additional information:</p> <ul style="list-style-type: none"> <li>• Construction traffic routes to be used during the Project’s construction, if different from that shown in Appendix A of the oCTMP. This will consider planned works on local road including surface access improvement works.</li> <li>• Access and egress points to each construction compounds and works areas.</li> <li>• Confirm the conditions when contingency routes will be used as part of the construction traffic routes.</li> <li>• Provide the criteria for when local roads will need to be used e.g for local suppliers, emergency situations and when construction is on the local road.</li> </ul> <p>As set out in Section 2.2.7 of the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b>, where further design information is required to identify detailed mitigation measures, management plans will be submitted for approval by the relevant planning authority (or relevant highway authority) prior to commencement of the relevant construction works: Construction Traffic Management Plan (CTMP) will be substantially in accordance with the <b>ES Appendix 5.3.2: Code of Construction Practice Annex 3 – Outline Construction Traffic Management Plan [APP-085]</b></p>
<b>17.1B</b>	Re-routing of non-airport traffic during	C	Negative	Ultimately, subject to approval of the DCO, a full Construction Management Plan will be	Airports National Policy Statement	The Applicant refers to its response to 17.1A above regarding the detailed <b>ES Appendix 5.3.2: Code of</b>

	<p>construction of the highway works to less desirable nearby routes on the local highway network</p>			<p>required that sets out the timescales and intended means of constructing the development and any necessary traffic management and measures to mitigate and reduce the impact of construction on the transport network. Clarification is required in relation to measures proposed within the Outline Construction Management Plan (APP-085). This is required to include firm commitments and specific details as to what is proposed.</p> <p>Ultimately, subject to approval of the DCO, a full Construction Workforce Travel Plan that expands upon the high-level measures currently put forward by the Applicant will be required. A Travel Plan, specifically aimed at mitigating the transport impacts of construction workers travel throughout the construction period, is needed. The current document submitted by the Applicant is high level and clarification on the specific mitigation measures proposed is required. This is required to include firm commitments and specific details as to what is proposed.</p> <p>To be secured via requirement.</p> <p>Consideration of additional mitigation to limit the impact of the proposals during construction.</p> <p>To be secured via requirement</p>	<p>requires mitigation measures at construction stage and that they, "... draw on best practice from other major construction schemes...".</p> <p>Local Plan Policy IN3</p> <p>(Development and Requirements for Sustainable Travel) notes that, "Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety."</p>	<p><b>Construction Practice Annex 3 – Outline Construction Traffic Management Plan [APP-085]</b> and ES Appendix 5.3.2: Code of Construction Practice Annex 2 – <b>Outline Construction Workforce Travel Plan [APP-084]</b> ES Appendix 5.3.2: Code of Construction Practice Annex 2 – <b>Outline Construction Workforce Travel Plan [APP-084]</b>.</p>
<b>17.1C</b>	<p>Detrimental impact on the condition of the road surface of the local highway network, due to the</p>	<b>C</b>	<b>Negative</b>	<p>Applicant to commit to funding a Highway Structural Maintenance Contribution which contributes to the costs of maintaining, in a good state of repair, the local road network</p>	<p>Airports National Policy Statement requires mitigation measures at construction stage</p>	<p>The Applicant does not consider that a general contribution to the costs of maintenance is appropriate or necessary and in the absence of actual damage to the local road network would not be fairly and reasonably related in scale and kind to the</p>

	increase in construction traffic including HGVs and abnormal loads.			<p>during the construction period, to mitigate the impact of construction traffic.</p> <p>To be secured in a control document or via obligation.</p>	<p>and that they, "... draw on best practice from other major construction schemes...".</p> <p>Local Plan Policy IN3 (Development and Requirements for Sustainable Travel) notes that, "Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety."</p>	<p>development. The Applicant is however proposing a Transport Mitigation Fund, which is secured through the <b>draft Section 106 agreement</b> [REP2-004] and would be available to mitigate the unforeseen impacts of the Project.</p>
17.1D	Impact on the line loading and seated load capacity of rail services on the Arun Valley Line	O	Neutral	No specific comments.	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should</p>	This is noted.

					meet the access needs they generate	
<b>17.1E</b>	Impact on the line loading and seated load capacity of rail services on the North Downs Line.	O	Neutral	No specific comments.	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	This is noted.
<b>17.1F</b>	Increases to the line loading and seated load capacity of rail services on the Brighton Main Line	O	Negative	<p>Train access is a key transport mode to ensure sustainable travel to and from the airport is maximised.</p> <p>However, trains are less utilised for staff and early morning flights, as train services in the early morning and late evenings are insufficient. The Applicant should consider, with the relevant organisations’, improvements to the coverage of rail services, including earlier morning/late evening services and include any additional mitigation within a revised Service Access Commitments document (APP-090).</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF paragraph 110 states, “In assessing sites that may be allocated for development in plans, or specific applications for development, it</p>	<p>The need for early morning and evening services is already recognised by the Applicant and rail and bus operators, as set out in paragraph 7.1.5 of <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>], as well as the benefit of strengthening weekend services. GAL 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. The Applicant also has a partnership agreement with GTR under which both parties work together to promote rail access to and from Gatwick, improve the passenger experience and increase rail mode share. Liaison with operators will continue as the Applicant works to deliver the public transport mode share commitments set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>].</p>

					<p>should be ensured that:</p> <p>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.”</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	<p>The ES has been prepared in consideration of NPPF para 110. This is referenced at para 2.7.8 of <b>ES Appendix 2.2.1: National Planning Policy Context</b> [APP-072] and paragraph 12.2.11 of <b>ES Chapter 12: Traffic and Transport</b> [AS-076].</p>
<b>17.1G</b>	<p>Increased levels of crowding on local bus services due to a forecast increase in demand for bus and coach services from 8,600 daily passengers in 2029 to 13,400 in 2047.</p>	O	Negative	<p>To produce a full Airport Surface Access Strategy which sets out clear commitments in relation to bus and coach travel.</p> <p>The Highway Authority would look for further engagement with coach and bus operators to ensure all potential route enhancements and bus priority measures have been considered to maximise the potential for sustainable travel to and from the airport, as far as is possible.</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF paragraph 110 states, “In assessing sites that may be allocated for development in plans, or specific applications for</p>	<p>The request to produce a full Airport Surface Access Strategy is noted, but not accepted. As set out in Chapter 2 of the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> [APP-090], the SAC is secured as a legally binding commitment under the DCO and is supported by funding obligations in the <b>draft Section 106 Agreement</b> [REP2-004]. The Applicant will produce a new ASAS in line with the existing policy requirements under the Aviation Policy Framework and there is no need to duplicate that same provision in the DCO when all necessary mitigation in respect of the Project is already separately committed to under the SAC. Subject to the DCO consent being granted, any future ASAS will be developed in full cognisance of the</p>



				To be secured in a control document or via requirement.	<p>development, it should be ensured that:</p> <p>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.”</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	<p>commitments the Applicant is making about surface access outcomes and measures as part of the Project, as secured by the SAC, and become the means through which the commitments in the SAC are delivered. The SAC and its commitments would remain in full force and effect, independent of that future ASAS, and the Applicant would continue to need to demonstrate compliance with its terms. The periodic preparation of Airport Surface Access Strategies under the regime explained in the Aviation Policy Framework has worked well, with Gatwick proving to be an industry leader in its approach to public transport mode share and other innovations.</p> <p>The Applicant has a successful record of engaging with bus and coach operators to identify and deliver service improvements and will continue to engage with bus and coach operators in delivering improvements as the Project progresses.</p> <p>Specific and clear commitments in relation to bus and coach travel are set out in the <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> <a href="#">[APP-090]</a> (including commitments 5-7) and in the <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> (including paragraph 5 of Schedule 3).</p>
17.1H	Enhanced and new regional coach services could have a potential positive impact by increasing the available options and attractiveness to travel via sustainable modes to and from the airport	O	Positive	No specific comments.	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires</p>	The positive response is noted and welcomed.

					that new development should meet the access needs they generate.	
17.1I	Enhanced local bus service provision could have a positive impact by increasing available options to travel by sustainable modes to and from the airport.	O	Positive	No specific comments.	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	The positive response is noted and welcomed.
17.1J	Improvements to local walking and cycling infrastructure as part of the associated highway works providing a benefit when compared with the existing infrastructure provision	O	Positive	No specific comments.	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF, paragraph 110b (requires the provision of safe and suitable access) and 112a (for</p>	The positive response is noted and welcomed.

					<p>development to give priority first to pedestrian and cycle movements).</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	
17.1K	<p>Increased traffic levels on the local network as a result of the Project result in a reduced propensity for people to walk and cycle on the local highway network</p>	O	Negative	<p>The Applicant to review the need for further enhancements to active and sustainable travel provision to and from the airport to provide high quality walking and cycling routes between the local area and the airport.</p> <p>Crawley LCWIP has identified various routes between local areas and Gatwick Airport which could provide high quality connections to help meet the target modal splits set out within the Surface Access Commitments (APP-090) and to meet the requirement of the Airport NPS to maximise sustainable transport as far as is possible</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF, paragraph 110b (requires the provision of safe and suitable access) and d (that any highway safety impacts can be cost effectively mitigated to an acceptable degree), development to give priority first to</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090] sets out the commitments which GAL is making and on which the assessment is based. They include reference to a wider package of measures which GAL will deliver, including signage, information, promotion of active travel and staff incentives. The Project highway works also include enhancements and additions to the existing active travel infrastructure in the vicinity of the Airport, as described in Section 14.4 of the <b>Transport Assessment</b> [AS-079] and in Appendix A (Technical Note: Active Travel Provision Details) of <b>The Applicant’s Responses to Actions from Issue Specific Hearing 4: Surface Transport</b> [REP1-065]. The Sustainable Transport Fund (secured in the <b>draft Section 106 Agreement</b> [REP2-004]) provides a continuing mechanism for providing funding for further initiatives aimed at increasing the use of sustainable transport modes</p> <p>Based on the assessment of the Project in the</p>

					<p>pedestrian and cycle movements).</p> <p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate and 112a (for</p>	<p><b>Transport Assessment [AS-079]</b> and <b>ES Chapter 12: Traffic and Transport [AS-076]</b>, no further measures are required to mitigate the impact of the Project, in addition to the surface access improvement works which are part of the Project.</p> <p>The matters related to mitigation are included at Rows 2.20.4.5 to 2.20.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council [REP1-033]</b>. 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>
17.L	<p>Potential increase in vehicle traffic associated with the Project is likely to increase the number of vehicle movements on the local road network which will cause resultant negative impacts on other road users, which could include impacts on the perception of safety from other road users, delay, and road safety implications.</p>	O	Negative	<p>The Applicant to review the need for further enhancements to active and sustainable travel provision to and from the airport, to provide high quality walking and cycling routes and public transport provision. Any additional mitigation should be included within a revised Service Access Commitments document (APP-090) and secured by Requirement in the Draft DCO.</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF, paragraph 110b (requires the provision of safe and suitable access) and d (that any highway safety impacts can be cost effectively mitigated to an acceptable degree), and 112a (for development to give priority first to pedestrian and cycle movements).</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b> sets out the commitments which we are making and on which the assessment is based. They include reference to a wider package of measures which GAL will deliver, including signage, information, promotion of active travel and staff incentives. The Project highway works also include enhancements and additions to the existing active travel infrastructure in the vicinity of the Airport.</p> <p>Based on the assessment of the Project in the <b>Transport Assessment [AS-079]</b> and <b>ES Chapter 12: Traffic and Transport [AS-076]</b>, no further measures are required to mitigate the impact of the Project, in addition to the surface access improvement works which are part of the Project.</p> <p>The matters related to mitigation are included at Rows 2.20.4.5 to 2.20.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council [REP1-033]</b>. The Applicant will continue to engage with West Sussex County Council</p>

					<p>Policy IN3: Development and Requirements for Sustainable Transport – requires that new development should meet the access needs they generate.</p>	<p>on this matter and provide further updates to the SoCG in due course.</p>
<p><b>17.1M</b></p>	<p>The Applicant is heavily reliant on existing rail services and the introduction of parking charges to meet the target modal splits set out within the Surface Access Commitments (APPP-090).</p> <p>Should these modal splits not be achieved there is likely to be a larger highway impact than is forecast.</p>	<p>O</p>	<p>Negative</p>	<p>The Applicant to review the need for further enhancements to active and sustainable travel provision to and from the airport to provide high quality walking and cycling routes and public transport provision.</p> <p>Consideration given to further monitoring and measures to mitigate non-compliance of the SACs.</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>NPPF, paragraph 110b (requires the provision of safe and suitable access) and d (that any highway safety impacts can be cost effectively mitigated to an acceptable degree), and 112a (for development to give priority first to pedestrian and cycle movements).</p> <p>Policy IN3: Development and Requirements for</p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090] sets out the commitments which we are making and on which the assessment is based. They include reference to a wider package of measures which the Applicant will deliver, including signage, information, promotion of active travel and, monitoring commitments (Commitments 15 and 16). The Project highway works also include enhancements and additions to the existing active travel infrastructure in the vicinity of the Airport.</p> <p>The Applicant already operates parking and forecourt charges and the SACs include commitments to the use of these charges to influence demand. The Applicant is able to vary charges relatively promptly to respond to travel patterns and they will therefore be an important tool in achieving the mode share commitments. In addition, the <b>draft Section 106 Agreement</b> [REP2-004] secures a Transport Mitigation Fund (at paragraph 10 of Schedule 3) which is available to address unexpected impacts s directly related to the increased capacity of Gatwick Airport which require mitigation.</p> <p>Based on the assessment of the Project in the <b>Transport Assessment</b> [AS-079] and <b>ES Chapter 12: Traffic and Transport</b> [AS-076], no further measures are required to mitigate the impact of the Project, in addition to the surface access improvement works</p>

					<p>Sustainable Transport – requires that new development should meet the access needs they generate.</p>	<p>which are part of the Project. The assessment of impacts on rail users and rail services indicates that the Project would not lead to a need for additional capacity on the rail network.</p> <p>The matters related to mitigation are included at Rows 2.20.4.5 to 2.20.4.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council</b> <a href="#">[REP1-033]</a>. 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>
17.1N	<p>Methodology used by the Applicant to identify number of new staff and passenger spaces is unclear. If the amount of parking provided on-airport results in an over-supply or under-supply, this could negatively impact on achieving the Applicant’s surface access commitments.</p>	O	Negative	<p>The Applicant should set out the methodology used to identify the amount of new staff and passenger parking, demonstrating how this achieves ‘sufficient but no more’ parking than is required proportionate to meeting its surface access commitments relating to public transport mode share.</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p> <p>S106 Legal Agreement 2022 (GAL/WSCC/CBC) Obligation 5.6</p> <p>Gatwick Airport Surface Access Strategy 2022</p> <p>Crawley Local Plan Policy GAT3</p>	<p>Please refer to the <b>Car Parking Strategy</b> <a href="#">[REP1-051]</a> which was submitted at Deadline 1.</p>
17.1O	<p>It is unclear if/how the updated 2023 Staff Travel Survey has been taken into account. It is possible that staff travel habits may have changed</p>	O	Negative	<p>Applicant should have regard to the results of the 2023 staff travel survey and explain if any changes in staff travel habits are considered relevant to the outcomes of its transport work and surface access commitments.</p>	<p>Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.</p>	<p>Please refer to Section 4.2 of <b>The Applicant’s Response to Actions from ISH2-5</b> <a href="#">[REP2-005]</a> which was submitted at Deadline 2.</p>

	since previous (pre-pandemic) surveys.				S106 Legal Agreement 2022 (GAL/WSCC/CBC) Obligation 5.6  Gatwick Airport Surface Access Strategy 2022  Crawley Local Plan Policy GAT3	
<b>17.1P</b>	<p>The proposed monitoring framework does not demonstrate how remedial action, should it be necessary if mode share targets are not met, will be secured nor what sanction will be in place should commitments remain unmet.</p> <p>This presents risk that airport growth comes forward in a manner that is not in sync with the surface access commitments.</p>	O	Negative	<p>The Highway Authority would look for the Applicant to adopt an approach similar to the Green Controlled Growth approach, adopted by Luton Airport, which restricts further development, or passenger/ATM growth at the airport until specific modal split targets are met in relation to surface access.</p> <p>This revised approach to airport growth development would provide control and comfort that outcomes and modal split targets are to be met, rather than just a hope that they will be and the potential for several years of trying to address non-compliance with the modal split targets retrospectively</p>	Airport NPS requires sustainable travel to and from the airport is maximised as much as is possible.  S106 Legal Agreement 2022 (GAL/WSCC/CBC) Obligation 5.6  Gatwick Airport Surface Access Strategy 2022  Crawley Local Plan Policy GAT3	<p>The Applicant has carefully considered the approach to growth and Surface Access Commitments. The commitments being made and the way in which they are structured are appropriate in the context of the anticipated rate of growth which is forecast for dual runway operations at the airport.</p> <p>The <b>Applicant's Written Summary of Oral Submissions from ISH2 [REP1-057]</b> sets out the Applicant's position on environmental limits. Section 6.2 of the <b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b> sets out the approach to monitoring and the process for dealing with breaches or anticipated breaches of the Surface Access Commitments.</p>
<b>17.1Q</b>	Baseline parking assumptions made	O	Negative	The proposed robotic parking provision should be included as part of the DCO. The	Airport NPS requires sustainable	Please refer to Section 4.6 of <b>The Applicant's Response to Actions ISH2-5 [REP2-005]</b> which was submitted at Deadline 2.

	by the Applicant include are not considered by the LPA to be accurate.			Applicant should clarify if the Hilton Hotel Car Park has been lawfully implemented for this to be included in the baseline.	travel to and from the airport is maximised as much as is possible.  S106 Legal Agreement 2022 (GAL/WSCC/CBC) Obligation 5.6  Gatwick Airport Surface Access Strategy 2022  Crawley Local Plan Policy GAT3	
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#### 4.16 Socio-Economics and Local Economy

4.16.1 The following table sets out the Applicant's response to matters raised on Socio-Economics.

**Table 4.11: The Applicant's response to matters raised on socio-economics**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
18.1a	Employment opportunities for local people in West Sussex	C/O	Positive	Provision of local jobs through ensuring the Applicant employs local people and uses local supply chains. The mechanism for enabling this would be the ESBS.	Airports NPS at Paragraph 4.4 states that the Examining Authority and Secretary of State will take into account the potential benefits, including the facilitation of economic development	Noted – the Applicant continues to work with the local authorities to develop the Implementation Plan for the ESBS.



					<p>(including job creation).</p> <p>WSSC 'Our Council Plan 2021-2025' notes that a social value framework will be implemented to secure jobs and opportunities for local people through procurement and contract management within the county.</p> <p>WSSC 'Economy Plan 2020- 2024' aims to enable employment, skills recovery and resilience' through working with partners to maximise opportunities for people in West Sussex.</p> <p>mCBLP Policy EC5 Employment and Skills Development</p> <p>Mid Sussex Sustainable Economic Strategy</p>	
<b>18.1b</b>	Construction and operational phase worker requirements	C/O	Negative	The Applicant should revisit their approach to determining labour supply constraints during construction and operation.	Airports NPS at paragraph 5.329 states that in	The Applicant has provided a labour supply analysis at different spatial scales in Section 5 of <b>ES Appendix</b>

	<p>on the labour market in West Sussex.</p>				<p>addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts on local communities.</p> <p>Airports NPS at paragraph 4.73 states that the Applicant should identify measures to avoid/reduce or compensate for adverse impacts as appropriate.</p> <p>mCBLP Policy GAT1 outlines criteria that will be taken into account by the Council in responding to a DCO where growth at Gatwick Airport is proposed. The Council expects the policy to be met by the airport operator through appropriate requirements or S106 obligations.</p>	<p><b>17.9.3: Assessment of Population and Housing Effects</b> [APP-201].</p> <p>A further response to construction labour market issues is provided in <b>The Applicant’s Response to Local Impact Reports</b> (Doc Ref. 10.15) – Construction Labour Market and Accommodation Impacts.</p>
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					<p>Mid Sussex Sustainable Economic Strategy</p> <p>Mid Sussex District Plan (2018) seeks opportunities for local people to live and work in their local communities</p>	
<b>18.1c</b>	Adverse impact on housing supply - temporary accommodation during construction phase and affordable housing for operational phase	C/O	Negative	<p>Provision of more temporary accommodation for construction workers to reduce impact on the local community.</p> <p>Mitigation through funding grants to assist in ensuring more affordable units are available to low-income workers at the airport during the operational phase.</p>	<p>Airports NPS at Paragraph 5.329 states that in addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts on local communities.</p> <p>Policy H1 of the Crawley Borough Local Plan 2015-2030 states that the Council will support proposals which meet local housing needs.</p> <p>mCBLP Policies H1 (Housing Provision);</p>	<p>The Applicant has addressed population and housing effects during the construction and operational phases of the Project within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201].</p> <p>The Project is unlikely to place pressure on housing supply across the study area as a whole during the operational phase. <b>ES Chapter 17: Socio-Economic</b> [APP-042] assesses the impact of the construction workforce on housing (temporary accommodation) to be minor adverse in the LSA, FEMA and LMA during the peak year of construction (para 17.9.18), while in the 2047 operation forecast there is assessed to be a minor adverse in the LSA and FEMA and negligible in the LMA (para 17.9.155).</p> <p>On this basis, no further mitigation measures beyond those outlined in Section 17.8 and those presented in other ES chapters are proposed.</p> <p>A further response to this issue is provided in <b>Appendix D - Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>

					<p>H4 (Future Housing Mix); H5 (Affordable Housing); H6 (Build to Rent); H9 (Houses in Multiple Occupation).</p> <p>MSDC DP DP4 sets out housing requirement, DP30 (Housing Mix, DP31 (Affordable Housing)</p>	
<b>18.1d</b>	Minor adverse effects of resident and business disruption e.g. noise and vibration, traffic and transport.	C	Negative	Reduce through control measures such as timed/phased construction periods, particularly avoiding night time construction and ensuring a traffic plan is in place to mitigate impact on the existing road networks.	<p>Airports NPS at Paragraph 4.7 states that construction and the use of airport infrastructure has the potential to affect people’s health, wellbeing and quality of life through traffic, noise, vibration, air quality and emissions, for example.</p> <p>Paragraph 4.73 states ‘the applicant should identify measures to avoid, reduce or compensate for these impacts as appropriate’.</p> <p>Paragraph 5.47 states ‘the</p>	<p>For business disruption, mitigation measures in the form of the Construction Traffic Management Plan will aim to reduce impact on journey times, particularly during the peak hours and periods (see paragraph 17.9.10 of <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a>).</p> <p>For resident disruption, affected properties would be eligible to take part in the noise insulation scheme which will aim to mitigate noise effects (see paragraph 17.9.20 of <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a>).</p>

					Government wants to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights. Major airports are legally required to develop strategic noise maps and Noise Action Plans based on those maps on a five yearly basis'.	
<b>18.1e</b>	Minor adverse impact on business activities displacement	C	Negative	Mitigate through a detailed programme and sequence of works to offset impact to business activities and relocation/displacement issues.	<p>Airports NPS at paragraph 5.329 states that in addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts on local communities.</p> <p>Policy CNP14 of the Copthorne Neighbourhood Plan 2021 states that development that would result in the loss of employment</p>	<b>ES Chapter 5: Project Description</b> <a href="#">[REP1-017]</a> provides a detailed programme and specific sequence of works to offset any relocation / displacement issues.

					<p>floorspace/land would not be permitted unless it demonstrates that on-going use of the premises/land for employment purposes is no longer viable.</p> <p>The Mid Sussex Site Allocations Development Plan 2022 states that proposals which would result in the loss of Existing Employment Sites will not be supported, unless they clearly demonstrate that the site/premises are no longer needed or viable for employment use.</p> <p>Policies EC1, EC2, EC3 of the Crawley Borough Local Plan 2024-2040</p> <p>mCBLP Policies EC1, EC2, EC3, EC4</p>	
<b>18.1f</b>	Employment and Skills	C/O	Negative	Mitigate through ensuring the Applicant includes appropriate mitigation in the ESBS	Airports NPS paragraph 4.4 states	There are no significant adverse impacts on skills or business identified in the <b>ES Chapter 17: Socio-</b>

				<p>to guarantee proportionate financial contribution towards employment and skills and business initiatives.</p>	<p>that when considering any proposed development, the Examining Authority and Secretary of State will take into account the potential benefits, including the facilitation of economic development (including job creation), and any long term or wider benefits alongside the potential adverse impacts.</p> <p>The WSCC 'Economy Plan 2020-2024' Theme 5 aims to enable employment, skills recovery and resilience' through working with partners to maximise opportunities for people in West Sussex.</p> <p>The WSCC 'Our Council Plan 2021-2025' notes that a social value framework will be</p>	<p><b>economic</b> [APP-042]. As such there are no impacts that require mitigation.</p> <p>Section 17.8 of <b>ES Chapter 17: Socio-economic</b> [APP-042] lists the ESBS as enhancement activity and paragraph 17.13.5 reads:</p> <p>“moderate beneficial significant labour market effects have been identified during the operation of the Project from 2032 to 2047 at the LSA and FEMA levels. These effects would be subject to further enhancement measures as part of the ESBS. No significant adverse effects have been identified in terms of socio-economic effects.”</p> <p>The Applicant is proposing an ESBS Fund to support the delivery of the ESBS.</p>
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					implemented to secure jobs and opportunities for local people through procurement and contract management within the county.  mCBLP Policy EC5 Employment and Skills Development  Mid Sussex Sustainable Economic Strategy	
<b>18.1g</b>	Impact on property prices due to construction work disruption and increased number flights	C/O	Negative	The Applicant should undertake this assessment.		The Applicant has justified its position regarding an assessment of property price impacts within Table 17.4.2 of <b>ES Chapter 17: Socio-economic</b> [APP-042]. A further explanation is provided in response to question SE.1.13 in <b>The Applicant's Response to the ExQ1</b> (doc Ref. 10.16) – Socio-Economic Effects
<b>Para 18.25 and 18.63</b>	<b>General –</b>  There should be positive impacts, but the Authorities are not persuaded how these will be captured locally.	C	Positive			The creation of a large number of jobs at the airport will naturally benefit local residents as they have an increased number and choice available. These benefits will be enhanced through the ESBS.
<b>Para 18.27 and 18.28</b>	<b>Employment –</b>  Overall, the benefits of employment generation on the	C	Negative			The local and national economic assessments and the traffic forecasts underpinning them reflect a realistic view of the benefits that would arise from the Project, and sensitivity analyses were undertaken around core estimates to reflect the uncertainty surrounding some of the model assumptions.



	<p>project have been overestimated.</p> <p>The construction jobs calculation appears to be based on a “maximum” scenario and is therefore not applying a worst-case.</p>					<p>The local impact assessment shows that within the Six Authorities Area, the Project will support up to 12,800 jobs and £1.11bn of GVA in 2047. The assessment shows that the NRP will contribute to increased economic activity and estimates effects that are net of displacement (i.e. removing people who would be employed anyway in the local area) such that it is unlikely to overestimate employment benefits locally.</p> <p><b>ES Chapter 17 Socio-economic [APP-042]</b> assesses the construction workforce at different stages of the project, not just at the peak.</p> <p>As set out in <b>The Applicant’s Response to the ExQ1 – Socio-Economic Effects [Doc Ref. 10.16]</b> The Applicant’s Response to Local Impact Reports – Construction Labour Market and Accommodation Impacts, the workforce averages nearly 1,000 across the first four years, with a peak of 1,400.</p>
<p><b>Para 18.29, 18.64</b></p>	<p><b>Employment –</b></p> <p>Many of the jobs generated by the Project during construction will be lower-paid, low-value jobs which will not make a significant net additional contribution to the economies that are local to the Project.</p>	C/O	Negative			<p>The estimate of Direct, Indirect, Induced and Catalytic jobs in <b>ES Chapter 17 Socio-economic [APP-042]</b> is the net additional jobs.</p> <p>The range of jobs required is set out in Table A1.1 of the <b>ES Appendix 4.3.1: Forecast Data Book [APP-075]</b> it includes pilots, IT, air traffic control, managerial and professional and a range of technical roles.</p>
<p><b>Para 18.32, 18.37 and 18.38</b></p>	<p><b>Employment –</b></p> <p>Whilst the Applicant has undertaken assessments at the</p>	C	Negative			<p>The Applicant has presented construction employment at the local authority level in <b>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199]</b>.</p>

	<p>regional level, assessments at the local authority level are needed for those authorities based in the FEMA, to inform potential effects on employment at a local level.</p> <p>This is a concern, as the Authorities understand there to be skills shortages across the construction sector in Sussex, including for basic construction skills and more specialist sectors within the supply chain, as informed by Future Skills Sussex in its Local Skills Improvement Plan (2023).</p>					<p>Additionally, an assessment of effects is provided at different spatial levels including FEMA in Table 17.6.6 and Section 17.9 in <b>ES Chapter 17: Socio-Economic [APP-042]</b>.</p> <p>A further response to this issue is provided in <b>Appendix D – Construction Labour Market and Accommodation Impacts</b> (Doc Ref. 10.15).</p>
<p><b>Para 18.33, 18.48, 18.65, 18.68 to 18.72, 18.87 to 18.95</b></p>	<p><b>ESBS –</b></p> <p>The Applicant should provide details on timescales, performance, financial management, monitoring and</p>	<p>C/O</p>	<p>Negative</p>			<p><b>A draft Section 106 Agreement Annex: ESBS Implementation Plan</b> (Doc Ref. 10.11) has been shared with the local authorities that includes detail on the financial contribution, monitoring and evaluation. All of the funding is additional.</p>

	<p>reporting in the ESBS which can be developed as part of an Implementation Plan.</p> <p>The ESBS provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a Business as Usual scenario.</p>					
<p><b>Para 18.43</b></p>	<p><b>Labour supply –</b></p> <p>The sensitivity for the Local Study Area (LSA) is assessed as medium, which given the small size of the construction labour market would appear to be incorrect; it should be graded as being of high sensitivity. The Applicant advises that the Project would not require a workforce that specialises in</p>	<p>C</p>	<p>Negative</p>			<p>The Applicant has justified the sensitivity for the LSA as medium in Table 17.6.6 of <b>ES Chapter 17: Socio-economic [APP-042]</b>. As stated within Table 17.4.3, a receptor is only assessed to have high sensitivity “where a receptor has limited ability to respond to change and therefore limited potential for substitution.” This does not accurately characterize the construction labour market in the LSA. As per Table 17.6.6, it has been assessed that given recent growth in the construction labour market in the LSA it is more suitable to describe the receptor as having medium sensitivity, defined as “where a receptor has some ability to respond to change and therefore some potential for substitution.” The grading of ‘medium’ reflects the relative sensitivity of the LSA labour market compared to those at the FEMA and LMA levels, while also acknowledging the recent growth in the labour force and number of firms operating in the LSA.</p>

	<p>housing development and implies that housing development activity should not be impacted significantly. However, there is a related requirement for a workforce to deliver infrastructure associated with housing development which has not been considered by the Applicant.</p>					<p>The assessment for requiring infrastructure associated with housing development is presented in <b>ES Chapter 17: Socio-economic</b> <a href="#">[APP-042]</a> para 17.9.22 – 17.9.25.</p> <p>A further response to this issue is provided in <b>The Applicant’s Response to Local Impact Reports</b> (Doc Ref. 10.15) – Construction Labour Market and Accommodation Impacts.</p>
<p><b>Para 18.45</b></p>	<p><b>Labour supply –</b></p> <p>The assessment uses ONS model-based estimates of unemployment for the year July to June 2021, with rates held at this level to 2047. This dataset significantly overstates unemployment (and therefore labour market capacity) in comparison to the latest data from the 2021 Census.</p>	<p>C</p>	<p>Negative</p>	<p>The analysis should be revisited with the benefit of the latest and most reliable information, which is now the 2021 Census.</p>		<p>Within the <b>Applicant’s Response to Actions – ISHs 2-5</b> <a href="#">[REP2-005]</a> ISH3 Action Point 5, the Applicant has provided an updated assessment of population and housing effects during construction using data from the 2021 Census.</p> <p>The Applicant also notes that the ONS model-based estimates, as National Statistics, are generally preferred for socio-economic assessment as they provide more up-to-date coverage on a monthly basis, rather than Census data which provides the unemployment rate for a single date (the Census Day). Furthermore, the furlough scheme – which no longer operates – artificially decreased the unemployment rate at the time of the 2021 Census. As such, it would not be appropriate to update the analysis to use the 2021 Census unemployment rate.</p>

<b>Para 18.46</b>	<b>Labour supply –</b>  Paragraph 5.2.14 of Appendix 17.9.3 of the ES states that the Project is only expected to be a determinant in whether there is labour shortfall or surplus in the Housing Market Area (HMA) for one area (Croydon and East Surrey). The basis for this conclusion does not appear robust, as based on the analysis, the Project is shown to exacerbate labour shortfall issues across multiple areas.	C	Negative	Justification needs to be provided for the basis of the assessment given the analysis and limitations identified.		The surplus of labour in the North West Sussex Housing Market Area (Crawley, Horsham and Mid Sussex, where Gatwick is located) is relatively large in comparison to the shortfalls that exist in other areas. Given the proximity of these housing areas, it is reasonable to assume that labour would be sufficiently mobile across these areas to balance any shortfalls as mentioned in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201] para 5.2.12 – 5.2.13.
<b>Para 18.47</b>	<b>Labour supply –</b>  Paragraphs 4.1.2-4.1.4 of Appendix 17.9.3 describes the “primary scenario” split of where construction workers will be based, with 80% identified as Home Based (HB)	C	Negative	The Applicant should revisit their approach.		The Applicant has provided a labour supply analysis at different spatial scales including the FEMA in Section 5 of <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201]. A further response to this issue is provided in <b>The Applicant’s Response to Local Impact Reports</b> (Doc Ref. 10.15) – Construction Labour Market and Accommodation Impacts.

	and 20% as Non Home Based (NHB) drawing on Quod's Gravity Model. The model however does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA.					
<b>Para 18.49</b>	<p><b>Housing supply (temporary accommodation) –</b></p> <p>The Authorities believe there are potentially significant effects on temporary accommodation at the LMA and FEMA level, and have concerns with the Applicant's assessment methodology in relation to both the magnitude and sensitivity criteria.</p>	C	Negative			<p><b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> provides further detail on population and housing effects during construction. Within <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> the magnitude criteria have been based upon industry best practice in preparing socio-economic chapters of Environmental Statements. The significance of effects is based upon consideration of receptor sensitivity and the magnitude of impact. The receptor relevant to temporary accommodation is housing (at the LSA, FEMA and LMA levels), which has sensitivity ranging from 'low' to 'very low' with justification provided in Table 17.6.6 of the document. The receptor is not specific to temporary accommodation, as the construction workforce are considered to reside in private rented or other forms of private accommodation; these are the same forms of accommodation that would form the receptor in the operational phase. The magnitude of impact is assessed to be medium, based on the detailed assessment within <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a>, which combined with a low receptor sensitivity would imply a minor adverse effect in EIA terms.</p>

<p><b>Para 18.50, 18.52</b></p>	<p><b>Housing supply (temporary accommodation) –</b></p> <p>The research on vacant bed spaces is out of date and requires updating to take account of the current situation in the local areas.</p> <p>The Authorities are also unclear as to how the Applicant has arrived at the final calculation in Table 6.2.2 – ‘estimated number of vacant private rental properties’ – applying the methodology as explained beneath Table 6.2.2 provides an estimated NWS HMA total of 513 properties, compared with the 533 arrived at by the Applicant.</p>	<p>C</p>	<p>Negative</p>			<p>The figures shown within tables in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201] are calculated within Excel, and therefore have been rounded for inclusion within the tables in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> [APP-201]. In any event, the Applicant has provided a revised assessment of the analysis in Section 6 of APP-201 using updated data from the 2021 Census, including updated data on vacant bedspaces, within <b>The Applicant's Responses to Actions ISHs 2-5</b> [REP2-005], ISH3 Action Point 5.</p>
<p><b>Para 18.56</b></p>	<p><b>Housing supply (temporary accommodation) –</b></p>	<p>C</p>	<p>Negative</p>			<p>The Applicant considers that the potential demands associated with temporary construction workers have been sufficiently addressed in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b></p>

	<p>The Council remains very concerned that the Applicant's assessment of housing need during the construction period has taken a narrow view and does not fully consider what is a significant demand and therefore competition for the limited available accommodation in HMOs, B&amp;Bs etc and costs are already increasing. This reinforces the view that the Applicant should undertake a more granular assessment at the local authority area level relating to the availability of temporary accommodation for construction workers.</p>					<p><a href="#">[APP-201]</a> (Section 6) and in the <b>Applicant's Response to Actions ISH2-5</b> <a href="#">[REP2-005]</a> ISH3 Action Point 5 - this includes a local authority-level assessment for all authorities where more than one non-home based worker is expected to be based (Crawley, Reigate and Banstead, Mole Valley, Mid Sussex, Tandridge, Horsham and Croydon). As set out in <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> Table 6.1.1 the number of non-home based workers associated with the Project at the peak is expected to be a total of 250, of which half (124) are in the North West Sussex Housing Market Area, of which most (115) are in Crawley. <b>ES Appendix 17.9.3: Assessment of Population and Housing Effects</b> <a href="#">[APP-201]</a> contains a detailed analysis of the potential sources of supply at a local authority level to meet this need. A further response to this issue is provided in <b>The Applicant's Response to Local Impact Reports</b> (Doc Ref. 10.15) – Construction Labour Market and Accommodation Impacts</p>
<p><b>Para 18.64</b></p>	<p><b>Employment –</b> The Authorities believe that employment benefits have been overstated in the local area particularly</p>	<p>O</p>	<p>Negative</p>			<p>The local and national economic assessments and the traffic forecasts underpinning them reflect a realistic view of the benefits that would arise from the Project, and sensitivity analyses were undertaken around core estimates to reflect the uncertainty surrounding some of the model assumptions. The local impact assessment shows that within the Six Authorities Area, the Project will support up to 12,800</p>



	<p>given the concerns about the reliability of the Applicant's growth forecasts.</p> <p>The Authorities are also concerned about the methodology used to assess catalytic employment and GVA benefits of the Project.</p>					<p>jobs and £1.11bn of GVA in 2047. The assessment shows that the NRP will contribute to increased economic activity and estimates effects that are net of displacement (i.e. removing people who would be employed anyway in the local area) such that it is unlikely to overestimate employment benefits locally.</p> <p>Regarding the catalytic impact methodology, please refer to the response provided in Section 3.15, row "Para 4.25" above of this document.</p>
<b>Para 18.65</b>	<p><b>Employment –</b></p> <p>There is no reference to social mobility within the ES documentation.</p>	O	Negative			<p>Social mobility is referenced in Table 17.2.3 of <b>ES Chapter 17: Socio-economic</b> <a href="#">[APP-042]</a>.</p>
<b>Para 18.73 to 18.75</b>	<p>Labour market (availability of operational labour) –</p> <p>The new jobs created at Gatwick could lead to labour shortages in the local authority areas in the FEMA.</p> <p>The Applicant has not considered existing skill levels within the local area to fulfil some of the more specialised</p>	O	Negative	<p>The Applicant should undertake local impact analysis as part of the socio-economic assessment to understand the potential labour shortages existing in local authority areas in the FEMA.</p>		<p><b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> considers the local labour market context. As part of this, the size and skills profile of the market are key determinants of the sensitivity of the labour market receptor at the LSA, FEMA and LMA levels. Further, <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> <a href="#">[APP-198]</a> provides greater detail on skills and will be accompanied by the forthcoming Implementation Plan.</p>

	roles during the operational phase.					
<b>Para 18.76 to 18.78</b>	<p><b>Housing supply –</b></p> <p>A more granular assessment of housing delivery needs to be done at the individual authority level as doing them at an aggregated level is hiding the true impacts at the local authority level.</p> <p>Crawley is unable to meet its housing affordable needs, even in the absence of the Project.</p>	O	Negative			<p>The Applicant has provided a response concerning the declaration of a Housing Emergency by Crawley Borough Council within <b>The Applicant's Response to Actions ISH 2-5</b> <a href="#">[REP2-005]</a>, ISH3 Action Point 4.</p>
<b>Para 18.81</b>	<p><b>Employment Land Supply –</b></p> <p>The Applicant has previously indicated at Topic Working Groups that the Project will generate catalytic (off-airport) employment land requirements of between 15 and 18 hectares, understood to be set out in the Applicant's Airport-Related Employment</p>	O	Negative			<p>The ARELS was done at the request of the local authorities to help them understand how much wider growth they may need to plan for. It includes land uses (offices, hotels and warehousing) with different levels of functional relationship to Gatwick Airport at different spatial scales. The conclusions of the study are not spatially specific, ie it does not identify a specific need for certain space in certain locations, other than on-airport. The results were presented to the Local Authorities at a Topic Working Group.</p> <p>The DCO application includes provision of space for those uses which are directly related to expansion and need to be on-site (offices and hotels – no additional space for freight is necessary) and the effects of these have been included in the Environmental Assessment.</p>

	Land Study (ARELS). However, there does not appear to be confirmation within Environmental Statement Chapter 17 or its supporting Appendices, of the off-airport employment land requirement that would arise as a result of the Project.				
<b>Para 18.82 to 18.83</b>	<b>Property prices –</b> The Applicant should conduct an assessment of Project impacts on property prices.	O	Negative		The Applicant has justified its position regarding an assessment of property price impacts within Table 17.4.2 of <b>ES Chapter 17: Socio-Economic</b> <a href="#">[APP-042]</a> . A further explanation is provided in response to question SE.1.13 in : <b>The Applicant’s Response to the ExQ1</b> (Doc Ref 10.16) – Socio-Economic Effects.
<b>Para 18.84</b>	<b>Visitor Economy and Tourism –</b> The Authorities are concerned that due to the connectivity of the airport with London, this benefit will not be captured in the West Sussex area.	O	Negative		The Applicant has outlined the likely local impacts of the scheme on tourism within section 6.4 of <b>ES Appendix 17.9.2 Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> . Please refer in particular to paras. 6.4.5-6.4.6 which outline that while tourists “flying to Gatwick may intend to go to London or beyond, it is also the case that some remain in or visit the local area around the Airport (e.g. after arrival or before departure, or as part of a wider visit to the UK)”. Local tourism impacts are captured in the local economic impact assessment as part of the induced and catalytic footprint of the scheme.

<b>Para 18.100</b>	<b>Gatwick Community Fund –</b>  The Authorities do not consider that the amounts of funding in the proposed Community Fund are proportionate to the growth of the Airport, effectively a doubling from the 2023 position in the next 25 years, nor are they sufficient to make a meaningful difference in the communities impacted.	O	Negative			The amount of the London Gatwick Community Fund is linked to passenger numbers to ensure that funding is scaled according to passenger volumes and is therefore directly linked to the impacts of airport growth. The aim is to improve the wellbeing and vitality of communities who are, or will be, affected by the increase in passenger numbers at Gatwick Airport. Projects that will be supported benefit groups of people within communities close to, or impacted by, our operations.  The Applicant considers the amount of the Fund is set at an appropriate scale once all other mitigation and other interventions and initiatives are taken into account and is proportionate on the basis of the information available. The size of the Fund and the provisions governing its application are considered to be fairly and reasonably related in scale and kind to the Project. The incremental increase in contribution from 50 mppa upwards reflects the increase in revenue that will be received as a result of the increased number of passengers and therefore the Applicant considers it appropriate to increase the contributions toward the community accordingly.
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#### 4.17 Cumulative Effects

- 4.17.1 The approach to the assessment of cumulative effects is in accordance with PINS advice note seventeen and is set out in section 20.4 of **ES Chapter 20 Cumulative Effects and Inter-Relationships** [\[APP-045\]](#).
- 4.17.2 Cumulative effects with Heathrow third runway are addressed in **ES Chapter 20 Cumulative Effects and Inter-Relationships** [\[APP-045\]](#) as a sensitivity taking into account both the ongoing uncertainty around whether consenting work on the Heathrow third runway might recommence and in view of the limited available information. Further detail is provided in the **Applicant’s Response to ExQ1 CE.1.1** (Doc Ref.10.16)
- 4.17.3 The long and short list of other developments for the purposes of the cumulative effects assessment is provided in **ES Appendix 20.4.1 Cumulative Effects Assessment Long and Short List** [\[APP-216\]](#). This has been subject to consultation with statutory and non-statutory consultees during the EIA process as described in section 20.5 of **ES Chapter 20 Cumulative Effects and Inter-relationships** [\[APP-045\]](#). This consultation included the review of the long list which was accompanied by a detailed technical note describing the way in which the search area and topic Zones of Influence (ZoI) were identified and refined and a figure showing the extent of the Zols, sent out to consultees in September 2022. Also further consultation on the updated long list was undertaken with consultees in May 2023. From this long list, the short list was identified using the criteria set out in both the PEIR and in **ES Chapter 20 Cumulative Effects and Inter-relationships** [\[APP-045\]](#)). For the purposes of the cumulative effects assessment reported in the topic chapters 7 to 19 and summarised in

Table 20.7.1 of **ES Chapter 20 Cumulative Effects and Inter-relationships** [APP-045], each topic has considered the developments on the short list which could result in cumulative effects for that topic (the methodology is described in section 20.4 of **ES Chapter 20 Cumulative Effects and Inter-relationships** [APP-045]).

- 4.17.4 Table 19.1 in [REP1-068](#) sets out a list of other developments the Authorities consider may interact with the Project. The majority of these have been included in the short list for the cumulative effects assessment, with the exception of those that are located outside the search area (described out in section 20.4 of **ES Chapter 20 Cumulative Effects and Inter-relationships** [APP-045]) and have therefore not been included on the long list as they are not considered to have potential for cumulative effects together with the Project. Further detail about the way in which each of the developments listed in Table 19.1 have been considered for the cumulative effects assessment is provided in the **Applicant's Response to ExQ1 – Cumulative Effects** CE.1.2 (Doc Ref. 10.16).
- 4.17.5 **ES Chapter 20 Cumulative Effects and Inter-relationships** [APP-045] provides a summary of the cumulative effects that are detailed in the topic chapters. The approach to determining Zols per topic is set out in section 20.4, **ES Chapter 20 Cumulative Effects and Inter-relationships** [APP-045] from the topic assessments in ES chapters 7 to 19. Responses relating to matters raised in relation to cumulative effects for water, transport, noise and socio-economics are provided below.

#### Water Environment

- 4.17.6 As stated in paragraph 11.11.8 of **ES Chapter 11 Water Environment** [APP-036] the assumption is that the other developments would be subject to the same requirements of the Project and would need to include embedded and further mitigation to ensure no deleterious impacts upon the water environment. In relation to water infrastructure, Gatwick awaits the result of the impact assessment by Thames Water and has received confirmation via email from Sutton and East Surrey Water on 9 February 2024 that they can meet the water demands of the Project.
- 4.17.7 As stated above, Gatwick awaits the output of Thames Water's own impact assessment of the Project on their infrastructure. It is anticipated that Thames' impact assessment would need to consider the impacts of the Project in combination with other proposed developments within their STW catchments. The inclusion of the de-icer reed bed treatment facility has been discussed with Thames Water and to date they have not raised any concerns regarding constraints to increasing the footprint of Crawley STW should they choose to do so.

#### Noise

- 4.17.8 The Zol for the noise assessment does not stop at a particular distance such as 20km from the airport. Rather it extends to where the noise contours extend when mapping the required noise metrics. For example, the N60 10 contours extend further than 20km from the airport and the overflight mapping extends 35 miles from the centre of the Airport. In this way the assessment provides the noise and overflight information required to assess all areas affected.
- 4.17.9 In **ES Chapter 14 Noise and Vibration** [APP-039], paragraph 14.11.15 states the assumption that local planning authorities, when considering applications for new residential development, would not allow those developments to proceed if the residents of those proposed developments would subsequently be significantly affected by aircraft noise, or if the local planning authority considered the impacts on those future residents otherwise unacceptable. The ES has provided the noise exposure information to facilitate planning new residential developments, taking account of the noise mitigation measures adopted to reduce noise from the airport.
- 4.17.10 Paragraph 22.42 of the Local Impact Report says the noise assessment does not take account of the increased use of WIZAD. The noise assessment does take account of the increased use of WIZAD, see ES paragraph 14.6.39 and associate noise contour figures.
- 4.17.11 Paragraph 22.52 of the LIR says for mitigation the council requires 'Controls around the use of WIZAD to ensure no overflight of the built up areas of Horsham Town including development sites at North of Horsham and West of Ifield is sought'. The WIZAD Standard Instrument Departure route already exists and is already flown by aircraft for the reasons summarised on ES paragraph 14.6.39, so it is not proposed to put restrictions on its use. It is not flown at night. The ES has modelled the noise levels associated with the increased use

of WIZAD in the future baseline (ie without the Project), and the noise impacts associated with the additional traffic from the project on this route which are predicted to be not significant (see Horsham District Council SOCG, paragraph 2.17.2.3 that includes detail of the results of noise modelling reported in the ES and the accompanying online air noise viewer showing the impact of the northern runway project will not be significant in Horsham).

### Surface Transport

- 4.17.12 The core transport modelling for the Application does not include development West of Ifield or at Gatwick Green, because those developments are not classified as sufficiently certain to be included in the core modelling when considered against DfT Transport Appraisal Guidance (as explained in Section 12.11 of **ES Chapter 12: Traffic and Transport** [AS-076]). The core modelling is inherently cumulative (paragraph 12.11.4 of AS-076) but in this instance, the Application also examines cumulative development scenarios for the operational phases of the Project in 2029, 2032 and 2047, in which development at Gatwick Green, West of Ifield and Horley Business Park is explicitly added to the core modelling insofar as the nature and scale of that development in those years could be determined from the available information.
- 4.17.13 The cumulative assessment in **ES Chapter 12: Traffic and Transport** [AS-076] was based on the information about implementation dates for the three major developments that was available at the time. There was no information about anticipated construction methodology or vehicle movements for any of the three major development sites close to the Airport at the time the modelling was undertaken that would have allowed a representative scenario for construction activities to be developed, and the cumulative impacts identified in the operational phases for 2029 and 2032 were considered to be limited suggesting it was not necessary or possible to consider a cumulative construction scenario. There remains no certainty on the construction programme for any of those developments. The LIR refers to timescales which are indicated in the Crawley Local Plan 2030-2040 Modifications Consultation Draft (Feb 2024) but also notes, for example, that “it is unclear at what stage works on the transport network would commence were the west of Ifield development to come forward”.
- 4.17.14 In any event, as paragraph 12.11.78 of **ES Chapter 12: Traffic and Transport** [AS-076] notes, it would be for the relevant development promoters and local authorities to assess and consider what mitigation would be required to address the effects associated with each of those development sites once detailed proposals are put forward through a planning application.

### Socio-economics

- 4.17.15 Mitigation is not required for the construction labour supply impacts. This is set out in **ES Chapter 17 Socio-Economic** [APP-042] and further information on labour supply and demand is provided in Appendix D to this submission, Construction Labour Market and Accommodation Impacts.
- 4.17.16 Table 5-1 of the **Gatwick Construction Workforce Distribution Technical Note** [APP-199] sets out the number of workers expected from each local authority district. It is not appropriate to assess significance at this level as there is no individual borough-level construction labour market. Labour markets are properly assessed at the functional market area level.
- 4.17.17 In relation to affordable housing, as stated previously, the Applicant has addressed population and housing effects within **ES Appendix 17.9.3: Assessment of Population and Housing Effects** [APP-201]. As confirmed within the **Written Summary of Oral Submissions from Issue Specific Hearing 3: Socio-economics** [REP1-058], paragraph 5.2.14-5.2.15, the Applicant considers that within **ES Appendix 17.9.3** the issue of impact on affordable housing for the purposes of this application have been sufficiently addressed. The affordable housing assessment within **ES Appendix 17.9.3** has shown that the potential tenure demands associated the construction phase of the Project either in itself, or in cumulative terms, is not considered likely to have any impact on affordable housing demands beyond what has already been planned for. The affordable housing assessment also includes analysis at local authority level (for the local authorities adjacent to Gatwick) for recent completions, local authority evidence of need, local plans and pipeline supply.

## 4.18 Health and Wellbeing

4.18.1 The following table sets out the Applicant's response to matters raised on Health and Wellbeing.

**Table 4.12: The Applicant's response to matters raised on health and wellbeing**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
20.1A	Potential adverse impact on the health of West Sussex communities including vulnerable groups during construction and operational phases of the Project	C / O	Negative	The Applicant has not completed a standalone HIA or integrated a HIA to the same quality, scope, and scale as a standalone assessment specifically for West Sussex. It is recommended the Applicant undertakes a HIA that seeks to robustly assess the potential effects, including physical and mental, on the health of the population, analysis of some of the data on smaller geographies to highlight inequalities, and to make clear the mitigations or that need further consideration.	Public Health England (2020) Health Impact Assessment in Spatial Health Planning: A guide for local authority public health and planning teams.  Airports National Policy Statement: health impact analysis, shortlisted schemes (publishing.service.gov.uk)	The Applicant's position that <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> is a full Health Impact Assessment is set out in detail in the Deadline 1 Submission 10.9.4, the <b>Applicant's Response to Actions from Issue Specific Hearing 3: Socio-economics [REP1-064]</b> Action Point 6 (pdf pages 4 to 20). <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> signposts to and sets out appropriate mitigation to protect population health and any impact on local services and infrastructure. See for example Section 18.7 and Table 18.7.1 of <b>ES Chapter 18: Health and Wellbeing [APP-043]</b> . 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 <a href="#">[RR-4687]</a> 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". These Government organisations have a particular role and technical expertise in relation to health inequalities and they are satisfied with the current assessment.
20.1B	Limited local intelligence and insight into the planning assumptions of the Project, specifically how this may	C/O	Negative	There is no evidence of how community engagement with the affected communities has influenced the outcome and any mitigation made in the Applicants' assessments.	NPPF  (Section 131)	The Applicant's position is that community engagement has informed the assessment and mitigation, including that vulnerable group responses are inherently part of the consultation undertaken. This position is set out in the Deadline 2 Submission 10.9.7 <b>The Applicant's Response to Actions - ISH2-5 [REP2-005]</b> , Section 3.5 ISH3: Action Point 7.

	influence local communities and vulnerable populations			It is recommended the Applicant expands on the HIA that makes use of local intelligence and robustly engages vulnerable populations. The HIA should make clear how the Applicant has feedback from those communities to inform the assessment of health effects.		<p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043] signposts to and sets out relevant evidence sources, including relating to West Sussex. See for example:</p> <p>ES Appendix 18.2.1 Summary of Planning Policy - <b>ES Chapter 18: Health and Wellbeing</b> [APP-202], including for relevant districts within West Sussex.</p> <p><b>ES Appendix 18.3.2: Summary of Other Consultation Responses - Health and Wellbeing</b> [APP-204], which describes that West Sussex County Council and relevant district councils participated in the health Topic Working Group.</p> <p><b>ES Appendix 18.4.1: Methods Statement for Health and Wellbeing</b> [APP-205], including using NHS West Sussex CCG – QOF Database (via OHID fingertips).</p> <p><b>ES Appendix 18.5.1: Health Baseline Trends, Priorities and Vulnerable Groups</b> [APP-206], including setting out that there was a review of data from the West Sussex Joint Health and Wellbeing Strategy and West Sussex Joint Strategic Needs Assessment, with local health priorities informing the assessment.</p> <p><b>ES Appendix 18.5.2: Health and Wellbeing Baseline Data Tables</b> [APP-207]. Including extensive data for relevant ward, district and county level public health indicator, including for West Sussex.</p>
<b>20.1C</b>	Potential increased demand on local health care services	C/O	Negative	<p>The impact from construction staff on primary care and secondary care services is evidenced. However, the increased footfall of passengers when increased flights are operational, and the impact on emergency attendances for this group within secondary care A&amp;E services is unclear. It is recommended that the Applicant provides clarity in relation to the points identified above.</p>	Airports NPS 2018 (Paragraph 4.70)	<p>This issue is captured at Row 2.12.3.5 of the <b>Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council</b> [REP1-033],</p> <p>4.18.2</p>
<b>20.1D</b>	Potential to adversely impact air	C /O	Negative	Reference is made to the required changes and mitigation measures as	Airports NPS (2018)	The Applicant's position on points made by UKHSA in their relevant representation [RR-4687] are set out in the Deadline 2 Submission 10.2



	quality during construction and operational phases.			<p>reported in this LIR, section 15- Air Quality.</p> <p>Also, reference is made to the UKHSA assessment (RR-4687) which identifies a potential moderate impact from long term concentrations which have not been detailed in the assessment. The Authorities support</p> <p>UKHSA recommendations in relation to air quality and clarity needed from the Applicant.</p>	<p>(Paragraphs 5.32 – 5.34) National Networks NPS: (Paragraph 5.12)</p> <p>NPPF (Paragraph 180)</p>	<p><b>Relevant Representations Report</b> <a href="#">[REP1-048]</a>, Section 3.87. It is noted that the UKHSA conclude <a href="#">[RR-4687]</a>: “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”.</p> <p>4.18.3</p>
<b>20.1E</b>	Potential adverse noise impacts on health during construction and operational phases	C /O	Negative	<p>Reference is made to the required changes and mitigation measures as reported in this LIR, section 16- Noise and Vibration.</p> <p>Increase in operations and flights, leading to an increase in noise are likely to adversely impact health. The increase is expected to rise by approx. 13 million passengers per annum (mppa) by 2047. UKHSA (RR-4687) notes limitations in the Applicant’s assessment of noise and evidence of effectiveness in relation to some of the mitigations. The Authorities support UKHSA’s assessment and</p> <p>recommendations in relation to noise pollution.</p>	NPPF (Paragraph 191)	<p>The Applicant’s position on points made by UKHSA in their relevant representation <a href="#">[RR-4687]</a> are set out in the Deadline 2 Submission 10.2 <b>Relevant Representations Report</b> <a href="#">[REP1-048]</a>, Section 3.87. It is noted that the UKHSA conclude <a href="#">[RR-4687]</a>: “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”.</p> <p>4.18.4</p>
<b>20.1F</b>	Potential adverse health and road safety impacts from increase traffic flows, congested roads, air quality	C/O	Negative	<p>Potential negative impacts to health to surrounding residents due to increased road traffic from construction vehicles and increased passenger numbers. Reference is made to the required changes and mitigation measures as</p>	<p>NN NPS (Section 5)</p> <p>NPPF (Paragraphs 180 and 191)</p>	<p><b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Transport Nature and Flow Rate. The assessment concludes, paragraph 18.8.306 “Overall, minor adverse transport scores reflect that, whilst the increase in traffic volumes results in a very slight reduction in road safety, slight increase in journey times and slight reduction in active travel amenity,</p>

	and noise impacts and increased risk to pedestrian safety and to those living in close proximity to the road networks.			reported in LIR, section 17 - traffic and transport.		<i>and this is considered detrimental to some degree for public health, ie not negligible, the change due to the Project is <u>not significant for population health in EIA Regulation terms.</u></i>
<b>20.1G</b>	Potential impact on healthy lifestyle behaviours due to land take at Riverside Garden Park and Church Meadows	C/O	Negative	<p>The land is located within Surrey close to the West Sussex border and is accessible to West Sussex residents. There is potentially a negative impact on mental and physical health due to the inability to promote and sustain healthy behaviours that may be due to a reconfiguration of the recreational/green space. This might amount to limited and more difficult access to key facilities or may impact on the ability to safely undertake physical activity for example.</p> <p>The Applicant should assess the potential for proposed changes to the recreational space that may adversely impact on people' ability to maintain health and wellbeing.</p> <p>Additionally, the impact, and assessment of noise in recreational areas requires further understanding, ideally through engagement with communities to understand local views and concerns.</p>	NPPF 2023: (Section 98 and Section 102).	<p>4.18.5 <b>ES Chapter 19: Agriculture, Land Use and Recreation</b> [APP-044] and <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] section 18.8 paragraphs 18.8.310 (pdf page 108/214) to paragraph 18.8.360 (pdf page 118/214). sets out the assessment of Health and Wellbeing Effects from Changes in Lifestyle Factors. The assessment discusses Riverside Garden Park and Church Meadows, explaining:</p> <p>There is a 1.03 ha loss of land along the fringe of Riverside Garden Park, 0.34 ha of which is within the park. This is mitigated with a 1.43 ha gain in new open space on the land currently forming Carpark B.</p> <p>There is a 0.13 ha loss of land at the edge of Church Meadow. This is mitigated with a 0.53 ha gain in new publicly accessible open space adjacent to the meadow that will be accessed by a new footbridge across the River Mole.</p> <p><b>ES Chapter 18: Health and Wellbeing</b> [APP-043] paragraph 18.8.319 explains that the pathway of effect includes consideration of the influence of noise and paragraph 18.8.321 sets out relevant vulnerable groups, including associated with young and old age, low income, existing poor health and existing access barriers.</p> <p>The assessment concludes, <b>ES Chapter 18: Health and Wellbeing</b> [APP-043] paragraph</p>

						<p>18.8.357, that there is the potential for a minor adverse (not significant) population health effect. The assessment explains “<i>whilst the disruption caused by the Project is considered detrimental to some degree for public health, ie not negligible, a sustained widespread reduction in active travel or use of outdoor spaces is not expected, including for vulnerable groups</i>”.</p> <p>The Applicant’s position is that community engagement has informed the assessment and mitigation, including that vulnerable group responses are inherently part of the consultation undertaken. This position is set out in the Deadline 2 Submission 10.9.7 <b>The Applicant’s Response to Actions - ISH2-5</b> <a href="#">[REP2-005]</a>, Section 3.5 ISH3: Action Point 7</p>
<b>20.1H</b>	Potential economic and socio economic – creation of construction and operational phase jobs	C /O	Positive/Negative	Reference is made to the identified impacts, required changes and mitigation measures as reported in the local economic and socio- economic factors, section 18 of this LIR.	Airports NPS (Paragraph 5.266)	The Applicant will seek to enhance employment and skills opportunities, including apprenticeships through the <b>ES Appendix 17.8.1: Employment Skills and Business Strategy (ESBS)</b> <a href="#">[APP-198]</a>
<b>20.1I</b>	Potential adverse impacts from light pollution	C/O	Negative	Applicants’ assessment identifies a detrimental public health impact from nighttime lighting.	NPPF 2023 (Section 191)  Airports NPS 2018: (Paragraph 5.230)	<b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Exposure to Light. The assessment concludes, paragraph 18.8.451 “ <i>Overall, the minor adverse lighting effect scores reflect that, whilst increases in night-time light exposure may be considered detrimental to some degree for public health, ie not negligible, the change due to the Project is <u>not significant for population health</u> in EIA Regulation terms.</i> ”

#### 4.19 Construction Waste

4.19.1 The following table sets out the Applicant’s response to matters raised on Construction Waste.

**Table 4.13: The Applicant's response to matters raised on construction waste**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
21.A	Potential impacts of construction phase waste management	C	Negative	<p>Strengthening of the CoCP to ensure that impacts of construction waste management are controlled, including in Air Quality and Noise. Provide a Dust Management Plan and more information on noise controls during the construction phase.</p> <p>Strengthen the dDCO Requirement 7 to list the management plans that will require completion and approval.</p>	<p>Airports ANPS Paragraphs 4.70, 5.80, 5.136, 5.137, 5.138, 5.143, 5.145, 5.146</p> <p>National Planning Policy for Waste – Paragraphs 7 – 8</p> <p>West Sussex Waste Local Plan (April 2014). Policies W12, W16, W19, W23.</p>	<p>The management of construction waste is detailed in the Construction Resources and Waste Management Plan (Annex 5 to the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b>), which sets out the strategy and approach for individual Site Waste Management Plans to be prepared before construction and kept updated during construction, with copy to be provided to the Local Authorities when requested. The CRWMP is secured under Requirement 7 of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1).</p> <p>Matters in relation to Air Quality are included at 2.2.4.4 of the <b>Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council [REP1-032]</b>. The Draft Construction Dust Management Plan has been shared with local authorities for comment on the 26th March, considering the items set out in the Local Impact Report.</p> <p>The Level 2 control documents have been given their own DCO Requirements rather than being secured through the <b>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</b>.</p>

#### 4.20 Operational Waste

4.20.1 The following table sets out the Applicant's response to matters raised on Operational Waste.

**Table 4.14: The Applicant's response to matters raised on operational waste**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
22.A	Operation of new CARE waste facility	O	Negative	Provide an assessment and outline operational waste management plan to	Airports ANPS Paragraphs 4.70, 5.80,	The <b>Operational Waste Management Strategy</b> (Doc Ref. 10.12) presents the baseline waste arisings from

	(as submitted, to include biomass boilers and associated stack)			<p>demonstrate how operational waste will be managed, through the new CARE facility. The assessment should provide information on the current and future waste needs, and how waste will be managed in accordance with the Waste Hierarchy and national waste policy targets.</p> <p>Include, in the dDCO, a requirement to ensure waste is managed in accordance with the operational waste management plan, that includes reference to targets, the Waste Hierarchy and seeks to minimise the impacts of waste operations.</p> <p>Update the Design Principles - to ensure the CARE facility/building will be designed to limit the impacts associated with operating waste facilities, including, but not limited to, noise, dust, odour, vermin etc</p>	<p>5.136, 5.137, 5.138, 5.141, 5.143, 5.145, 5.146.</p> <p>National Planning Policy for Waste Paragraphs 7 - 8</p> <p>West Sussex Waste Local Plan (April 2014). Policies W12, W16, W19, W23</p>	<p>the Airport and a description of how these wastes are currently managed. The <b>Operational Waste Management Strategy</b> (Doc Ref 10.12) also includes the predicted waste forecasts that include waste arisings from the Project based on the predicted passengers numbers. The waste hierarchy underpins the Operational Waste Management Strategy and a minimum target has been set for the preparation for re-use and recycling of municipal waste of 50%. This target is in line with the Airport National Policy Statement (June 2018).</p> <p>An Operational Waste Management Plan will be prepared by GAL and its waste management operator that will be in general accordance with the <b>Operational Waste Management Strategy</b> (Doc Ref 10.12).</p>
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#### 4.21 Major Accidents and Disasters

4.21.1 The following table sets out the Applicant's response to matters raised on Major Accidents and Disasters.

**Table 4.15: The Applicant's response to matters raised on major accidents and disasters**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
23.1A	Potential impact to WSFRS' current and future responses to a range of emergency incidents at Gatwick Airport.	C/O	Negative	<p>The Applicant is required to confirm that they comprehend the emergency response protocols of WSFRS in case of any incidents at Gatwick Airport or in its vicinity.</p> <p>The Applicant must maintain regular communication with WSFRS throughout the construction and operation of the</p>	<p>National Risk register 2023_NATIONAL_RISK_REGISTER_NRR.pdf (publishing.service.gov.uk)</p> <p>Community Risk Register Community Risk Register for Sussex: 2023/24– Section 2 -</p>	<p>Fire prevention and emergency measures currently employed as part of Gatwick Airport operations would be in place and extended to the Project. During construction, the contractor will comply with the requirements of the local fire authority and the HSE's Fire safety in construction (HSE, 2010). Specific fire prevention measures would be</p>

				Project to enable them to plan for any impact that may align with their existing emergency response operations, procedures and standards.	<p>Natural and Environmental Hazards: Inland Flooding</p> <p>Section 3 Accidents and system failures: Major Fire, Transport Accidents (Air, Rail and Road).</p> <p>Section 4 Societal: Terrorism</p> <p>Fire and Rescue Services Act 2004</p>	<p>developed, as explained in the <b>Code of Construction Practice</b> <a href="#">[REP1-021]</a> (Section 4.10).</p> <p>The intent is to give an indication of future Project risk management through a description of present-day (and well-established) practices.</p>
<b>23.1B</b>	Potential impact to CBC's current and future responses to a range of emergency incidents at Gatwick Airport	C/O	Neutral	Change: The Applicant should acknowledge the increased risk of an incident occurring due to additional aircraft movements and passengers however, this is not anticipated to affect CBCs response to such an incident.	<p>National Risk register 2023_NATIONAL_RISK_REGISTER_NRR.pdf (publishing.service.gov.uk)</p> <p>Community Risk Register Community Risk Register for Sussex: 2023/24– Section 2 - Natural and Environmental Hazards: Inland Flooding</p> <p>Section 3 Accidents and system failures: Major Fire, Transport Accidents (Air, Rail and Road).</p> <p>Section 4 Societal: Terrorism</p>	<p>The risk of potential terrorist activities is not a function of passenger numbers or forecourt development. The increased capacity associated with the Project is not therefore considered to have a direct effect on this aspect.</p> <p>In addition, there are extensive mitigation and contingency measures in place to manage these risks. All security measures are confidential and cannot be detailed in the public domain.</p>
<b>23.1C</b>	Increased likelihood of a terrorist- related incident during the construction phase of the Project, and the impact of an incident of this nature.	C	Negative	The Applicant should work with WSFRS and other stakeholders to continually assess the risk of terrorist-related incidents during the Gatwick construction phase and provide timely updates to the existing Response Planning Group.	<p>National Risk register chapter 4 – terrorism 2023_NATIONAL_RISK_REGISTER_NRR.pdf (publishing.service.gov.uk)</p> <p>Community Risk Register – terrorism – section 4 societal terrorism. Section 3</p>	<p>The Applicant's engagement with the National Counter Terrorism Security Office (NaCTSO) is an on-going activity, and not one that occurs solely during airport development planning, although they are of course consulted on this issue.</p> <p>The risk of potential terrorist activities is not a function of passenger numbers or forecourt development. The increased capacity associated</p>

					Accidents and system failures	<p>with the Project is not therefore considered to have a direct effect on this aspect.</p> <p>In addition, there are extensive mitigation and contingency measures in place to manage these risks. All security measures are confidential and cannot be detailed in the public domain.</p>
<b>23.1D</b>	Potential impact to how quickly and effectively WSFRS will be able to respond to fire and other emergencies at the Airport.	C	Negative	<p>WSFRS has provided the following geographical areas that are of interest and concern if there is an expected increase in travel times between these locations due to the Project.</p> <p>The Applicant must provide specific information on the impact.</p>	<p>WSFRS Community Risk Management Plan Community Risk Management Plan 2022-2026 - West Sussex County Council</p> <p>Fire and Rescue Act 2004 Fire and Rescue Services Act 2004</p> <p>Fire and Rescue National Framework for England Fire and Rescue National Framework for England</p>	<p>Fire prevention and emergency measures currently employed as part of Gatwick Airport operations would be in place and extended to the Project.</p> <p>During construction, the contractor will comply with the requirements of the local fire authority and the HSE's Fire safety in construction (HSE, 2010). Specific fire prevention measures would be developed, as explained in the <b>Code of Construction Practice [REP1-021]</b> (Section 4.10).</p> <p>In addition, there are extensive mitigation and contingency measures in place to manage these risks. All security measures are confidential and cannot be detailed in the public domain.</p>
<b>23.1E</b>	WSFRS are adapting to the emergence of renewable energy systems and electric- powered vehicles and aircraft. The construction and operation phases will need to access the potential impacts and	O	Negative	The Applicant should collaborate with WSFRS to evaluate the hazard risks and uncertainties associated with system advancements and sustainable technology, thus enabling WSFRS to be operationally prepared	<p>Taking Charge: the electric vehicle infrastructure strategy</p> <p>WSSC Transport Plan</p> <p>Government guidance on parking and charging for electric vehicles</p> <p>UK battery strategy (HTML version) - GOV.UK (www.gov.uk)</p>	<p>Fire prevention and emergency measures currently employed as part of Gatwick Airport operations would be in place and extended to the Project.</p> <p>During construction, the contractor will comply with the requirements of the local fire authority and the HSE's Fire safety in construction (HSE, 2010). Specific fire prevention measures would be developed, as explained in the <b>Code of Construction Practice [REP1-021]</b> (Section 4.10).</p> <p>The intent is to give an indication of future Project risk management through a description of present-day (and well-established) practices.</p>

downside risks associated with the direction towards Net Zero and sustainability					Department for Energy Security and Net Zero	
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#### 4.22 Design and Sustainability

4.22.1 The following table sets out the Applicant's response to matters raised on Design and Sustainability.

**Table 4.16: The Applicant's response to matters raised on design and sustainability**

Ref No.	Description of Impact	Construction (C) / Operation (O)	Negative / Neutral / Positive	Required mitigation and how to secure it (Change / Requirement / Obligation)	Policy Context	Applicant's Response
24.1A	Lack of control over visual appearance / detailing of development / lighting	O	Negative	<p>Change –provide a suitably detailed design control document setting clear design principles for the Project as whole but also addressing design controls for specific Works areas to an appropriate level of detail including clear parameter and works plans.</p> <p>Requirement – provision for an independent design review panel to inform the detailed design process for some major elements of the works such as the hangar, hotels and office, decked and multi storey and decked car parks, terminal extensions, CARE building, highway works, to be secured through a DCO Requirement.</p>	<p>ANPS -paragraphs 4.29-4.35</p> <p>NNNPS – paragraphs 4.28 – 4.35</p> <p>NPPF Chapter 12 paragraphs 131-140</p> <p>CBLP policy CH2</p> <p>mCBLP policies CL2 and CL5</p>	<p>The Applicant refers the Councils to its response to Action Point 6 in <b>The Applicant's Response to Actions from Issue Specific Hearing 2: Control Documents / DCO</b> <a href="#">[REP1-063]</a> which explains the process for detailed design approval secured in the <b>Draft Development Consent Order</b> (Doc Ref. 2.1). The treatment of the detailed design of "excepted development" is described in paragraph 4.2.7 onwards of <b>Written Summary of Oral Submissions from Issue Specific Hearing 2: Control Documents / DCO</b> <a href="#">[REP1-057]</a>.</p> <p>Article 6(1) and (2) of the <b>Draft Development Consent Order</b> (Doc Ref. 2.1) requires numbered works to be situated within the limits of the corresponding areas on the <b>Works Plans</b> (Doc Ref. 4.5) and Article 6(3), (4) and (5) secure the relevant parameters in the <b>Parameter Plans</b> <a href="#">[AS-131]</a> and by reference to the <b>Surface Access Highways Plans – Engineering Section Drawings</b> (Doc Ref. 4.8.3).</p>



						<p>The Applicant has undertaken a comprehensive review of the <b>Design and Access Statement – Appendix 1 - Design Principles</b> (Doc Ref. 7.3) in response to the Local Authorities comments and in the <b>Applicant's Response to ExQ1 response to ExQ1</b> (Doc Ref. 10.16). In updating the Design Principles, the Applicant has either: specified the relevant Work No. against any existing site-specific design principles; or draft new site-specific principle(s) for each Work No. unless considered appropriate for the reasons set out in <b>Applicant's response to ExQ1</b> (Doc Ref. 2.1) DCO.1.57. For example, if the Work No. relates to the removal of existing structures and not the construction of new/replacement structure that would entail a new design, such that Design Principles would be relevant.</p>
<b>24.1B</b>	Lack of information on visual form of development and relationship with public realm / surroundings	C and O	Negative	<p>Change- a suitably detailed design control document setting clear design principles for the Project as whole but also addressing design controls for specific Works areas to an appropriate level of detail including clear parameter and works plans.</p> <p>Requirement – provision for an independent design review panel to inform the detailed design process for some major elements of the works such as the hangar, hotels and office, decked and multi storey and decked car parks, terminal extensions, CARE building, highway works, to be secured through a DCO Requirement.</p>	<p>ANPS -paragraphs 4.29-4.35</p> <p>NNNPS – paragraphs 4.28 – 4.35</p> <p>NPPF Chapter 12 paragraphs 131-140</p> <p>CBLP policy CH2</p> <p>mCBLP policies CL2 and CL5</p>	<p>The Applicant refers to its response to 24.1A directly above.</p>
<b>24.1C</b>	Lack of Control over landscaping and level of tree loss	C	Negative	<p>See comments Section 8 Table 8.1B Pentagon Field and 8.1C</p>		<p>The Applicant considers that there is sufficient control in place over the level of tree loss and</p>

				See comments Section 9 Table 9.1D, 9.1E, 9.1AB, 9.1AC		<p>provision of new planting under the DCO Application, in that:</p> <ul style="list-style-type: none"> <li>The DCO application sets out the level of tree loss based on the preliminary design, with the detailed tree removal and protection measures to be subject to local authority approval through the detailed Arboricultural Method Statements, as detailed in the <b>Code of Construction Practice - Annex 6 – Outline Arboricultural and Vegetation Method Statement</b> (Doc Ref. 5.3); and</li> <li>In respect of the new landscaping provisions, including new and replacement planting, the landscaping designs and maintenance details are to be subject to local authority through the respective Landscape and Ecology Management Plans in accordance with the <b>Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3).</li> </ul> <p>Both elements listed above are secured through the <b>Draft Development Consent Order</b> (Doc Ref. 2.1).</p>
<b>24.1D</b>	<p>Lack of control over building performance in terms of sustainability (energy and water efficiency).</p> <p>Currently, the Applicant only proposes to do a cost-benefit study,</p>	C and O	Negative	<p>If concluded technically and financially viable in the cost-benefit study, the Authorities expect that the Applicant will implement BREEAM Excellent certification (for water and energy credits) into the Scheme.</p> <p>There are no sustainability standards set out in any of the applicants control documents including either Appendix 1 of</p>	<p>Policy ENV6 and ENV9 in the CBLP and SDC1 and SDC3 in dCBLP expect new non-domestic buildings to achieve BREEAM Excellent (for water and energy credits) where technically and financially viable.</p>	<p>Sustainability accreditation schemes are one way of achieving sustainable outcomes in construction. Different schemes are available for different types of assets and covering different sustainability issues. GAL will consider whether the use of sustainability accreditation schemes will result in sustainability outcomes that may otherwise not be achieved.</p>

	including an analysis BREEAM.			the DAS or the CAP – the policy requirements should be set as a minimum standard and there should be flexibility in the document to ensure that sustainability measures meet the current adopted local plan standards for all new buildings and extensions throughout the life of the development.		
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## 5 Kent County Council

## 5.1 Overview

5.1.1 This section sets out the Applicant’s response to the points raised within the Local Impact Report submitted by Kent County Council [REP1-079]. The Applicant has retained the headings and structure of the Local Impact Report below.

## 5.2 Noise

5.2.1 The following table sets out the Applicant’s response to matters raised on Noise.

**Table 5.1: The Applicant’s response to matters raised on noise**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
Noise Impact A - Overflights	The Applicant’s discussion on overflights is lacking any kind of information on how communities would be affected by the proposed expansion. Figure 14.9.31 [APP-065] shows analysis where areas would experience overflights from both the Main and Northern Runway in 2032. Compared to Figure 14.6.7 [APP-063], which illustrates the 2019 Baseline overflight levels, it is clear that areas within west Kent would experience a worsening of overflight and be negatively impacted. This is particularly the case where aircraft turn over areas such as Tunbridge Wells to join the Instrument Landing System (ILS). Apart from the landscape assessment locations identified, no further details on the number of overflights are provided. Therefore, it is not possible to determine the extent to which the number of overflights are anticipated to increase within the set categories. For example, an area might currently experience 101 overflights a day but with the Northern Runway in place this would increase to 199, the location would be represented the same on the two maps, but communities on the ground would experience an additional 98 overflights per day, which is almost a doubling of the level of overflight they experience today.	Negative	Figure 14.9.31 of the <b>ES Noise and Vibration Figures</b> [APP-063, APP-064, APP-065] shows the expected overflight from all airports in 2032 with the Project. The figure title is incorrect, it should be 2032 All Airports Overflights With Project Flights (20%) as referred to correctly in the ES Chapter para 14.9.14. Figure 14.6.7 that this comment also refers to is 2019 Baseline Gatwick Overflight ie Gatwick airport only. The correct figure to compare Figure 14.9.31 against is Figure 14.6.18 2032 Baseline All Overflights, or Figure 14.6.8 2019 Baseline All Overflights. Comparing Figures 14.9.31 with 14.6.18 shows no locations in Kent will be overflowed by more than 20% additional flights on an average summer day, as confirmed for the landscape assessment location in Table 14.12.1. Hence the correct comparison has been made in the assessment.
Noise Impact A - Overflights	Furthermore, the proposals focus mainly on aircraft departing the airport, but little information is provided regarding aircraft arriving at Gatwick. Whilst KCC appreciates there is currently a limit of 55 movements per hour on the main runway, and the existing airspace structure limits the overall capacity of the airport to an estimated 69 movements per hour. Increased capacity generated by routine use of the Northern Runway would enable the airport the opportunity to increase movements per hour up from 55 to an estimated 69. If the Northern Runway is to be used for	Negative	Figure 14.9.31 shows the expected overflight from all airports in 2032 with the Project. The figure title is incorrect, it should be 2032 All Airports Overflights With Project Flights (20%) as referred to correctly in the ES Chapter para 14.9.14. The erroneous title (2032 A319 Departure Overflights from the Main and Northern Runways) may have led to this confusion. To clarify, the overflight density mapping, as explained in <b>ES Appendix 14.9.2: Air Noise Modelling</b> [APP-172] accounts for arrivals and departures. Yes, the NPR

	<p>departures only, then clarity is needed on the proposed breakdown of arrivals and departures on the main runway with the Northern Runway in operation for departures only. We have assumed that currently there is a 50:50 split between arrivals and departures using the main runway, so if this breakdown is to change with fewer departing aircraft using the main runway because they will use the Northern Runway instead, will this enable more arriving aircraft to land on the main runway? If this is to be the case then the number of arrivals using the main runway would intensify, resulting in additional noise impacts over Kent, a negative impact.</p>		<p>facilitates more arrivals on the main runway, and this has been fully taken into account in the noise assessment and overflight mapping and commentary.</p>
<p>Noise Impact B – Go-arounds</p>	<p>Kent is also exposed to go-arounds during westerly operations. Aircraft flying the second approach may well be lower than typical arrivals, resulting in additional noise impacts for communities on the ground. KCC appreciates it is incredibly difficult to predict go-around incidents, it must be noted that any increase in the number of flights at Gatwick will inevitably increase the chance of go-arounds and negatively impact west Kent communities on the ground.</p>	<p>Negative</p>	<p><b>ES Chapter 14: Noise and Vibration</b> [APP-039], Table 14.3.1: Summary of Scoping Responses, provide the following assessment of noise from go-arounds: In the busy summer season in 2019 there were approximately three go-arounds each day. 85% of these occurred within the 16 hour day and evening period, with 15% at night (23:00-07:00 hours). The Project includes eight new exit/entrance taxiways, plus the EATs and has been designed so that the numbers of go-arounds would not significantly increase. A significant proportion of the current go-arounds is due to the main runway being occupied. The use of the Northern runway will reduce the main runway utilisation from 55 movements per hour to c.43 under NRP, hence go-arounds are expected to decrease. As such, noise disturbance from go-arounds is not expected to increase and accordingly these are not assessed.</p>
<p>Noise Impact C – Night Noise</p>	<p>Whilst it is wholly desirable to reduce the noise disturbance from night flights it is nevertheless the case that in rural and semi-urban areas around Gatwick that any single incident of noise from aircraft may be substantially above background noise levels (even from those aircraft in the exempt category) and therefore disturbing to the communities that are affected. Figure 14.9.13 [APP-064] illustrates the difference between the 2032 Air Noise with Project Slower Transition Case v 2019 Baseline. It is clear that in Kent the Applicant anticipates there will be minor differences in levels of night noise. However, it is disappointing that the benefits of technological advances, such as quieter aircraft, will not be passed to communities on the ground and therefore the impacts would only be neutral.</p>	<p>Neutral</p>	<p><b>ES Noise and Vibration Figures – Part 2</b> [APP-064] Figure 14.9.13 illustrates the difference between the 2032 Air Noise with Project Slower Transition Case v 2019 Baseline. In the Kent area these minor differences will be 0 to 1dB reductions in the Slower Transition Fleet case. Fleet modernisation and the consequential noise reductions will be caught by the Noise Envelope, including as appropriate when that is reviewed, and this will share benefits with all communities affected by air noise from aircraft operating from the airport.</p>
<p>Noise Impact D – Tunbridge Wells District</p>	<p>The Applicant’s DCO application does not contain any information about aircraft noise in Tunbridge Wells, as it is outside any of the contours that have been produced. The only relevant metric for Tunbridge Wells would</p>	<p>Inconclusive</p>	<p>As explained in <b>ES Appendix 14.9.2: Air Noise Modelling</b> [APP-172] overflights up to 7,000 ft from all airports are considered in the mapping. Figures 14.6.7 and 14.6.8 Tunbridge Wells show Tunbridge Wells is overflown</p>

	<p>be the 'overflight' metric. The Applicant has produced maps showing 'overflights' from 2019 (Figure 14.6.7 to 14.6.8 of APP-063) and for 2032 (Figure 14.9.31 of APP-065), but they are of such coarse resolution that it is hard to draw any meaningful information from them. Additionally, the figure from 2032 does not just cover Gatwick Airport but covers all aircraft activity below 7,000 feet around Gatwick, which dilutes the impact from the increased movements as a result of the proposed expansion. It is therefore not currently possible to determine the level of impact of the proposals on Tunbridge Wells until the Applicant has updated their overflight assessment so meaningful information can be obtained regarding how communities would be affected by increased aircraft movements.</p>		<p>by aircraft from Gatwick and from other airports. Therefore the 20% additional number of overflights from Gatwick on an average summer day discussed in the ES is likely to result in an increase in the total number of overflights experienced of less than 20%. The overflight mapping provided illustrates the degree of change expected in the Tunbridge Wells area.</p>
<p>Noise Impact E – Sevenoaks District</p>	<p>Sevenoaks District, within Kent, is affected by aircraft associated with Gatwick Airport. Some routes for approaching aircraft to both the 08 and 26 runways overfly Sevenoaks District. Additionally, departures along the 26LAM, 08DTY and 08CLN routes overfly Sevenoaks District. These routes will experience an increase in aircraft movements as a result of the proposed expansion. The highest level of aircraft noise for the worst-case 2032 scenario [APP-064] at the western Sevenoaks boundary are approximately 54 dB LAeq,16h for the daytime and approximately 49/50 dB LAeq,8h for the night-time period. Increases in aircraft noise in Sevenoaks are identified as less than 1 dB for both the daytime and the night-time period. Although an increase in noise of 1 dB is not perceivable, and therefore currently a neutral impact, discussion on the impact of increases in aircraft movements is important for putting increases in noise into context and determining if a likely significant effect should be identified. Lmax levels would only change close to the airport where aircraft are required to fly on new routes as a result of operations on the northern runway. As such, aircraft Lmax noise levels are unaffected in Sevenoaks.</p>	<p>Neutral</p>	<p>Chiddingstone Church of England School, located within Sevenoaks District, shown on Figure 14.9.1, is one of the 7 Community Representative Locations for which the numbers of noise events is provided in <b>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</b> and discussed in ES Paragraph 14.9.155. The overflight mapping and discussion provides information on the numbers of additional overflights expected in this area. Paragraph 14.9.80 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. Whilst the increase in the numbers of overflights is reported to give context the significance of noise impacts is assessed in terms of the noise change, which in this case is not significant.</p>
<p>Noise Impact F – Community Representative Locations</p>	<p>Seven community representative locations were selected to: "...describe the air noise changes expected from the Project in more detail" (paragraph 14.9.150 [APP-039]). There is one community representative location in Sevenoaks (Chiddingstone Church of England). At this location, there is an increase in average daytime LAeq,16h noise of 0.8 dB and an increase in average night-time LAeq,8h noise of 0.3 dB. The N65 increase by 1 movement and the N60 increases by 2 movements. No</p>	<p>Neutral</p>	<p>This section describes the noise impacts of the Project at the Chiddingstone Community Representative Location. Lmax levels are discussed with reference to the N60 – the number of noise events above Lmax 60dB at night - and N65 – the number of noise events above Lmax 65 dB in the day.</p> <p>Overflights are not a noise metrics and are discussed separately for the wider area where noise levels are below the minimum noise level modelled.</p>

	information on overflights of LAmax levels are provided at the community representative location. For this particular location, the extent of this noise increase is deemed to have a neutral impact.		
Noise Impact G – Noise Envelope	As the 54 dB LAeq,16h noise contour for the slower growth scenario stretches into Sevenoaks, some properties in the area of the B2028, B2026 and Mill Hill roads would be eligible for insulation. However, the noise envelope put forward by the Applicant [APP-177] does not fulfil the purpose for which it is intended and nor does it fulfil the majority of characteristics stated in CAP 1129. Therefore, this would result in a negative impact to communities on the ground.	Negative	The noise envelope proposed in the DCO is consistent with government policy including the NPPF, ANPS and NPSE and follows the guidance provided by the CAA in CAP1129. Criteria metrics and levels were discussed in detailed with Noise Envelope Group. Please refer to <b>Statement of Common Ground Between Gatwick Airport Limited and Horsham District Council</b> [REP1-040], paragraph 2.17.5.1.
Noise Impact H – Overflight of Hever	Paragraph 8.6.219 of Environmental Statement Chapter 8: Landscape, Townscape and Visual Resources [APP-033] states: “ <i>ES Figure 8.6.3 (Doc Ref. 5.2) illustrates that a large proportion of the High Weald AONB coincides with existing Gatwick overflights at less than 7,000 feet above ground level. The main concentration of flights extends in a corridor east and fanning out and curving round to the south and west. Over 200 flights a day pass over areas to the east of Gatwick Airport in a corridor south of Edenbridge. A broader corridor of the AONB extending east and south from Hever to Crowborough is overflown by between 100 and 200 flights a day. These areas include popular and distinctive locations such as Hever Castle and the Ashdown Forest. Hever Castle is surrounded by formal gardens and parkland that are Grade 1 listed on the English Heritage Register of Historic Parks and Gardens. Visitors to the gardens experience a relatively large number of either visible or audible overflying aircraft.</i> ” Table 8.9.1 Increase in Daily Overflights at Assessment Locations – illustrates that Hever Castle will experience a 20% increase in daily overflights with the Project, this is a difference of 64.8 flights compared to the 2032 Baseline. Not only is Hever Castle a popular heritage asset, but it is also within the designated High Weald National Landscape. Hever Castle already experiences 308 daily overflights so an increase of this amount is considerable and will have a significant negative influence on the tranquillity of the area. Drawing 14.9.31 of Environmental Statement Noise and Vibration Figures – Part 3 [APP-065] illustrates how this impact will also extend wider than just Hever Castle and will result in a negative noise impact for communities in Hever. The current level of over-flight and resulting noise impact on West Kent is unacceptable and measures should be taken by Gatwick Airport Ltd to	Negative	A tranquillity study has been undertaken within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] in accordance with an appropriate methodology (to accommodate specific criteria in CAA CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated using heat maps in <b>ES Landscape, Townscape and Visual Resources Figures – Part 2</b> [APP-061] Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The assessment is based on the increase in overflying aircraft up to 7000 ft above local ground level as a result of the Project, compared to the future baseline scenario in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Hever Castle). 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 National Landscape 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. The largest increase in overflights is anticipated to be in areas that currently experience the greatest number of overflights, where relative tranquillity is slightly lower. An increase of up to 20% in the number of aircraft following the same flight paths may be discernible to some residents or observers but may also barely perceptible as an increase to

	reduce the number of aircraft flying over this area; and provide mitigation measures for the noise impacts.		<p>others. The magnitude of change is generally considered to be negligible and the level of effect up to minor adverse, which is not significant.</p> <p>ES Drawing 14.9.31 shows the extent of over flights expected in 2032 with the northern runway project. Figures 14.9.5 and 14.9.10 show the changes in daytime and night-time noise levels expected as a result of the project. At However these changes are expected to be less than one dB and the ES concludes that noise impacts in this area will not be significant.</p>
Noise Impact I – Overflight of Knole	<p>Paragraph 8.6.221 of Environmental Statement Chapter 8: Landscape, Townscape and Visual Resources [APP-033] states: “<i>Smaller areas of the landscape along the M25 corridor on the southern edge of the Kent Downs AONB between Merstham and Westerham and south of Sevenoaks are overflowed by between 1 and 10 Gatwick flights a day at less than 7,000 feet. This area includes the popular historic house and deer park at Knole, which is owned by the National Trust. In these locations, the visible or audible presence of Gatwick aircraft make a limited contribution to the level of tranquillity experienced by people using the landscape of the Kent Downs AONB.</i>” Table 8.9.1 Increase in Daily Overflights at Assessment Locations – illustrates that Knole Park will experience a 13% increase in daily overflights with the Project, this is a difference of an extra 1.8 flights per day compared to the 2032 Baseline. Not only is Knole Park a tourist attraction, but it is also within the designated Kent Downs National Landscape. An increase of this amount is unlikely to impact the tranquillity of the area compared to the 2032 Baseline. Therefore, KCC would deem this impact to be neutral.</p>	Neutral	<p>A tranquillity study has been undertaken within <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> in accordance with an appropriate methodology (to accommodate specific criteria in CAA CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated using heat maps in <b>ES Landscape, Townscape and Visual Resources Figures – Part 2 [APP-061]</b> Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The assessment is based on the increase in overflying aircraft up to 7000 ft above local ground level as a result of the Project, compared to the future baseline scenario in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Knole Park). It is considered that the increase in overflights will be barely perceptible to some people and imperceptible to others. The magnitude of change is considered to range from No Change to Negligible and the level of effect would range from No Change to Minor adverse. Minor adverse.</p>
Noise Impact J – National Landscapes	<p>The continuous over-flight of arriving aircraft into Gatwick causes significant detrimental impact for residents of West Kent and impacts on the tranquillity of the countryside, including National Landscapes (previously known as Areas of Outstanding Natural Beauty (AONB)); where the Civil Aviation Authority (CAA) discourages over-flight, if practical, below 7,000ft. There needs to be better adherence to the Department for Transport’s (DfT) Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions (2014) to avoid over-flight of AONBs, where practical; and aircraft should also avoid flying over the major tourist attractions that are of significant national heritage value in West Kent. On 26th December 2023 a new duty came into force relating to Areas of Outstanding Natural</p>	Negative	<p>A tranquillity study has been undertaken within <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> in accordance with an appropriate methodology (to accommodate specific criteria in CAA CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated using heat maps in <b>S Landscape, Townscape and Visual Resources Figures – Part 2 [APP-061]</b> Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The assessment is based on the increase in overflying aircraft up to 7000 ft above local ground level as a result of the Project, compared to the future baseline scenario in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Knole Park). It is considered that the increase in overflights will be barely perceptible to some people and</p>



	Beauty (now called National Landscapes). Section 245 of the Levelling Up and Regeneration Act 2023 amends the National Parks and Access to the Countryside Act 1949, by removing the obligation of decision makers to “ <i>have regard to</i> ”, substituting it with a strengthened duty to ensure they “ <i>must seek to further the purposes</i> ”. An increase in noise from overflight as a result of the Northern Runway Project is not “seeking to further the purposes” of the National Landscape but rather the opposite through reducing tranquillity and therefore is in conflict with this Act of Parliament.		imperceptible to others. The magnitude of change is considered to range from No Change to Negligible and the level of effect would range from No Change to Minor adverse. Whilst an adverse effect on the perception of tranquillity has been identified it is not considered to constitute significant harm to this perceptual quality significant harm to this perceptual quality.
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### 5.3 Surface Transport

5.3.1 The following table sets out the Applicant’s response to matters raised on Surface Transport.

**Table 5.2: The Applicant’s response to matters raised on surface transport**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
Surface Transport Impact A – Access via Strategic Road Network	KCC notes that, while the journey time analysis presented in Chapter 12 of the Transport Assessment [AS-079] tends to forecast modest one-minute increases on Strategic Road Network journey times with the Project, there is a capacity risk identified for M25 Junction 7 (M23) in Tables 12.5.3 & 12.5.4. The merges & diverges of this intersection are forecast to operate at capacity in the model Core Scenario, so we would assume they would operate over capacity in traffic levels higher than this best practice planning scenario – with an associated negative impact on both public and private road transport access to the airport. Transport Assessment Annex E – Highway Junction Review [APP-263] confirms that both M25 and M23 journey time routes travel straight through M25 Junction 7 (M23) on the main line and do not use these merges & diverges, which cater for movements to and from Kent. It is therefore important to understand whether the model is well validated in this important part of the road network, which provides the primary road access to Gatwick from Kent. This is not possible from the information provided in Transport Assessment Annex B – Strategic Transport Modelling Report [APP260] Tables 7 to 13, which show summary validation performance by number of count screenlines and journey time routes meeting criteria – but does not identify which ones fail. Annex B Figure 11 appears to show a number of validation count sites on the M25	Inconclusive	The operation of the M25 Junction 7 has been discussed with National Highways through stakeholder engagement sessions. National Highways has indicated that it is satisfied with the strategic highway modelling and that the impact of the Project on the operation of the junction would be limited and does not require mitigation (for example see Table 12.9.27 of <b>ES Chapter 12: Traffic and Transport</b> [AS-076]).  Copies of the Local Model Validation Reports for the strategic and VISSIM modelling were shared with West Sussex County Council, Surrey County Council and National Highways, as the highway authorities for roads in the immediate vicinity of the Airport, as part of ongoing technical engagement during the development of those models.

	in the vicinity of M25 Junction 7 (M23) but performance of these sites does not appear to be reported. A Local Model Validation Report (LMVR) is mentioned in the Annex B text but does not appear in the Examination Library. In our Written Representation, KCC requests this being made available, so the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed.		
Surface Transport Impact A – Access via Strategic Road Network	KCC notes from Transport Assessment [AS-079] Table 11.3.4 (and Annex B Tables 128 & 178) that the 55% public transport mode share targets assume a nearly three-fold increase in total air passenger coach services between 2016 and 2047 with Project but this is supported by a fifteen-fold increase in air passenger coach services for Kent. If this ambitious patronage is not realised there is an associated negative risk that private traffic levels between Kent and Gatwick are higher than forecast, taking the merges & diverges of the M25 Junction 7 (M23) intersection over capacity. To better understand this impact, we make a request for a sensitivity test on public transport mode share forecasts in our Written Representation.	Inconclusive	This matter is included at Row 2.20.4.1 of the <b>Statement of Common Ground between Gatwick Airport Limited and Kent County Council</b> <a href="#">[REP1-041]</a> . The Applicant will continue to engage with Kent County Council on this matter and provide further updates to the SoCG in due course.
Surface Transport Impact B – Access via Local Road Network	KCC acknowledges the ability of the local road network to support the forecast demand from the Project, as outlined in the Transport Assessment [AS-079], in view of the highway improvements to terminal access associated with the Project. This should provide a neutral impact to people travelling to and from Kent. We note also the very low proportion of Kent passengers forecast to access the airport via the A264. We would like to review these impacts in the light of the model sensitivity test requested in our Written Representation under Surface Transport Impact A.	Neutral	This is noted.
Surface Transport Impact C – Rail Network Capacity	KCC acknowledges the significant volume of services and their theoretical capacity on the rail network to support the forecast demand from the Project, as outlined in the Transport Assessment [AS-079]. The assessment shows marginal changes in train loadings – though the veracity of these would be dependent on the spread of demand across the busiest parts of the day on the rail network. KCC has concerns about potential pressure on the two London transfer stations that support Kent trips to Gatwick, given there are no direct rail services (although Network Rail has concluded that service operations would be feasible via Redhill station). In view of this, together with our concern over the ambitious fifteen-fold increase in air passenger coach services for Kent to support	Negative	This matter is included at Row 2.20.4.2 of the <b>Statement of Common Ground between Gatwick Airport Limited and Kent County Council</b> <a href="#">[REP1-041]</a> . The Applicant will continue to engage with Kent County Council on this matter and provide further updates to the SoCG in due course.  Further details regarding the assessment of rail capacity have been provided at Deadline 2 in section 3 and 4 of the <b>Appendix C: Rail Passenger Modelling Clarification Note</b> (Doc Ref. 10.9.7).

	<p>the 55% public transport mode share target, we anticipate the Northern Runway Project will have a negative impact on current rail network capacity. A request for a second model sensitivity test on public transport mode share forecasts has been made in our Written Representation.</p>		
<p>Surface Transport Impact D – Public Transport: Kerbside Provision for Coaches</p>	<p>KCC appreciates that planning and funding support for additional coach services to Gatwick would be a positive impact for Kent travellers but is concerned that capacity provision for this additional traffic is unclear in the Transport Assessment [AS-079]. KCC agrees that coach supply should be determined by the operators / market forces but requests the Applicant to confirm that sufficient kerb space would be available to accommodate the significant increases in forecast coach arrivals &amp; departures. KCC is concerned that the significant dwell times associated with coaches catering to air passengers (boarding &amp; alighting with luggage) will limit the capacity of the finite kerb space available, in turn causing congestion on airport service roads, which may affect all roadside access. KCC notes that Transport Assessment Annex C – VISSIM Forecasting Report [APP-261] paragraph 2.1.1 indicates there are “two 24-hour Terminal Forecourt models, one for the South Terminal and one for the North Terminal, including detailed pick-up and drop-off behaviour and dwell, car parking etc. to test how the forecourts perform”, but the report itself does not appear to confirm the information requested.</p>	n/a	<p><b>Transport Assessment Annex C: VISSIM Forecasting Report</b> [APP-261] identifies the set of models that exist and confirms that the Corridor model has been used to assess performance of the highway network in the vicinity of the airport in the future baseline and with Project scenarios. Detailed assessment of the forecourt performance using the VISSIM models has not been undertaken as part of the DCO assessment. <b>ES Chapter 5 Project Description</b> [REP1-017], paragraph 5.2.151 sets out the proposed approach.</p> <p>It should be noted that GAL operates a coach park close to South Terminal, discrete from the forecourts where coaches drop off and pick up passengers, to avoid excess waiting at designated stops.</p>
<p>Surface Transport Impact E – Public Transport: Proposed Coach Services</p>	<p>Not all of the proposed enhanced coach services appear to have been carried over from Transport Assessment [AS-079] Tables 7.1.1 and 11.3.2 to Surface Access Commitments [APP-090] Table 1, which outlines the Applicant’s funding commitments for coach services. Proposed enhancements to the Uckfield-East Grinstead-Gatwick and the Romford-Upminster-Dartford-Gatwick coach services are missing, which would have a negative impact on the Applicant’s 55% public transport mode share targets as well as travellers from Kent. Transport Assessment [AS-079] Table 12.2.1 states the assumption that the Lower Thames Crossing is operational by 2029. On 9 March 2023 the Secretary of State for Transport made a statement indicating that construction of the Lower Thames Crossing would be re-phased by two years, with a revised estimated opening year of 2032. It is not known whether there will be further delays to that project. This means the enhanced Romford-Upminster-Dartford-Gatwick coach service will continue to suffer from existing and worsening congestion at the Dartford Crossing, providing a</p>	n/a	<p>Tables 7.1.1 and 11.3.2 of the <b>Transport Assessment</b> [AS-079] sets out the proposed routes and frequencies in the future baseline and indicative routes and frequencies with Project. Table 1 of <b>ES Appendix 5.4.1: Surface Access Commitments (SAC)</b> [APP-090] sets out the proposed enhancements as part of the Project.</p> <p>There are two routes (Uckfield-East Grinstead-Gatwick and Romford-Upminster-Dartford-Gatwick) which appear in the Transport Assessment tables and not in the SAC because they are already committed in the future baseline as part of the current Airport Surface Access Strategy (ASAS). An explanation is provided in paragraph 11.3.14 of the <b>Transport Assessment</b> [AS-079] and the tables in the Transport Assessment note that there will be continued support for these two routes and the frequencies remain unchanged from the future baseline. The Applicant will continue to engage with commercial operators and local authorities over the specification of a suitable route following on from recent discussions.</p>

<p>negative impact to the remaining service between Dartford and Gatwick. We propose a temporary mitigation until the Lower Thames Crossing is operational in our Written Representation. The proposed new Royal Tunbridge Wells-East Grinstead-Gatwick coach service is assumed to be routed via the A264. This is a narrow, rural, single carriageway road which KCC deems unsuitable for such a service – proposed to be half-hourly – providing negative impacts for coach passengers, other drivers and local residents along the route. We propose an alternative routeing for this service in our Written Representation.</p>		<p>In terms of the exact routing for the Tunbridge Wells-East Grinstead-Gatwick coach service, the Applicant has a successful record of engaging with bus and coach operators to identify and deliver service improvements and will continue to engage with these operators and with local authorities, including in respect of final service pattern, route and calling points.</p>
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#### 5.4 Climate Change / Greenhouse Gases

5.4.1 The following table sets out the Applicant’s response to matters raised on Climate Change / Greenhouse Gases.

**Table 5.3: The Applicant’s response to matters raised on Climate Change and Greenhouse Gases**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
Climate Change Impact A – Compliance with National Targets	<p>KCC is committed to playing its part in helping the Government meet the UK’s Net Zero target and to meeting the legally binding ambitions of the Paris Agreement (see Section 5: Relevant Kent County Council Policy Documents). At a local level, Kent County Council has set targets relating to climate change and has been clear that no development should not disbenefit these. The Applicant’s proposals refer to the Government’s Jet Zero Strategy. However, the Climate Change Committee (CCC) has several concerns around the Jet Zero Strategy and states that the strategy carries considerable risks in relation to the aviation sectors’ contribution to emission abatement to the Sixth Carbon Budget. The Climate Change Committee’s Progress in reducing emissions. 2023 Report to Parliament outlined their key messages. These are as follows: <b>Reliance on nascent technology.</b> The Jet Zero Strategy approach is high risk due to its reliance on nascent technology – especially rapid Sustainable Aviation Fuel (SAF) uptake and aircraft efficiency savings – over the period up to the Sixth Carbon Budget. The Government does not have a policy framework in place to ensure that emissions reductions in the aviation sector occur if these technologies are not delivered on time and at sufficient scale. <b>Demand management.</b> Demand management is the most effective way of reducing aviation CO2 and non-CO2 emissions. The Government has a</p>	Negative	<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"> <li>• “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</li> </ul>

range of options to manage demand, such as digital technologies, addressing private flying and providing lower-cost domestic rail travel. The Government should develop a suite of policy and technology options to address aviation demand. **Airport expansion.** The Committee's Sixth Carbon Budget Advice recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions. Since making this recommendation the Committee has noted that airports across the UK have increased their capacities and continue to develop capacity expansion proposals. This is incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate this additional demand. No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects. A framework should be developed by the Department for Transport in cooperation with the Welsh, Scottish and Northern Irish Governments over the next 12 months and should be operational by the end of 2024 at the latest. **Sustainable Aviation Fuel (SAF) mandate.** The process to implement the Government's ambitious SAF mandate is delayed and dependent on an uncertain domestic and global feedstock supply. The Jet Zero Strategy sets the SAF mandate target at 10% SAF by 2030. The CCC's Balanced Pathway assumes 2% SAF uptake by 2030; our Widespread Innovation Pathway assumes a 3% share in 2030. Government must build in contingency and risk management into the SAF mandate to prepare for the possibility of constrained domestic and global SAF supply throughout the 2020s and 2030s. **Non-CO2 effects.** Aviation non-CO2 effects have a net warming effect on the climate but have high levels of uncertainty and exhibit regional and seasonal variation. The second SAF mandate consultation does not include a defined commitment on aviation non-CO2 effects beyond developing an evidence base on its impacts. The Committee recommends Government commit to a minimum goal of no further additional warming after 2050 from non-CO2 effects. The CCC views the Jet Zero's reliance on new technologies as high risk. The Committee also advise that there should be no net airport expansion across the UK. They also suggest a clear action plan for the DfT: "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

*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 environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure."*

Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:

- *"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."*

	<p>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.” The framework is due to be completed by the end of this year, after which the CCC states there should be no net airport expansion unless the carbon intensity of aviation is outperforming the Government’s emission reduction pathway and can accommodate the additional demand. It is currently unclear within the Applicant’s proposals how they are complying with the Climate Change Committee’s recommendations. On this basis, we deem the Project to have a negative impact in terms of greenhouse gases and climate change.</p>		
Climate Change Impact B – Aviation Emissions	<p>Document 5.3 Environmental Statement – Appendix 16.9.4 – Assessment of Aviation Greenhouse Gas Emissions [APP-194] outlines the anticipated aviation emissions from the future baseline and a future with the Northern Runway project. The data shows that between 2029 and 2050 an extra 18,523 ktonnes of CO<sub>2</sub>e is projected to be produced from aviation emissions due to routine use of the Northern Runway, or 18,693kt of CO<sub>2</sub>e in the event of a slow fleet transition. To put this figure into context, the emissions from Kent as a whole in 2021 from the industry, commercial, public, domestic, transport, agriculture, waste management and land use, land-use change and forestry (LULUCF) sectors was 8,144 ktonnes<sup>1</sup>, less than half the extra emissions of this project to 2050. To further put this figure into context, the Woodland Trust states that one hectare of woodland sequesters 270 tonnes of CO<sub>2</sub>e over 30 years<sup>2</sup>. The timeline between 2029 and 2050 is 21 years and so one hectare of woodland would sequester approximately two thirds of this amount (if we assume that the sequestration is proportional each year <math>21/30 \times 270 = 189</math> tonnes of CO<sub>2</sub>e). The extra aviation emissions from this project to 2050 would require 98,005 hectares of woodland to fully offset the extra emissions (Calculation = <math>18,523,000 \text{ tonnes} / 189 \text{ tonnes per hectare} = 98,005 \text{ hectares}</math>). This is equivalent to completely planting four of the seven districts within the ‘Gatwick Diamond’ for the entire duration of the project: Mole Valley District Council (25,832ha), Reigate and Banstead Borough Council (12,914ha), Tandridge District Council (24,819ha), and Mid Sussex District Council (33,402ha).</p>	Negative	<p>Noted. That emissions under the Project increase is not disputed. The scale of emissions, and the contextualisation of these, is set out in the <b>ES Chapter 16: Greenhouse Gases</b> [APP-041]. The majority of residual emissions under the Project result from aviation and surface access, both of which reduce (year on year) towards the UK's Net Zero date in 2050. The strategy to ensure this is achieved at a national level (for aviation emissions) is set out in the UK Jet Zero strategy which provides an indication of the range of measures available to support mitigation of GHG emissions, but also the commitment of UK Government to ensure this downwards trajectory is maintained, out to a position in 2050 that aligns with the UK's international and legal commitments.</p>

Climate Change Impact C – Cost to Society of Greenhouse Gas Emissions	The government now evaluates the cost of the impact of greenhouse gas emissions on society within policies: “Greenhouse gas emissions values (“carbon values”) are used across government for valuing impacts on GHG emissions resulting from policy interventions. These carbon values represent a monetary value that society places on one tonne of carbon dioxide equivalent (£/tCO <sub>2</sub> e)”. The cost of one tonne of carbon on society, according to the Government’s Green Book, ranges from £276 per tonnes in 2029 to £378 per tonne in 2050. When calculating the extra cost to society due to the emissions from this project (using the Government’s carbon values), the annual cost ranges from £185 million to £343 million. From 2029 to 2050, the cumulative impact cost of the extra carbon emissions released from this project totals £5.93 billion. Overall, the cost of greenhouse gas emissions as a result of this Project will have a negative impact on society.	Negative	There are GHG costs and these have been included in the economic appraisal and these have been weighed against the very significant economic benefits, which are significantly net positive.
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## 5.5 Heritage Conservation

5.5.1 The following table sets out the Applicant’s response to matters raised on Heritage Conservation.

**Table 5.4: The Applicant’s response to matters raised on Heritage Conservation**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
Heritage Conservation Impact A – Impact on Historic Buildings	The Applicant’s Environmental Statement – Chapter 7 Historic Environment [APP-032], Baseline Report [APP-101] and Historic Environment Figures [APP-054] do not cover West Kent. It is essential that there is a reasonable assessment of the historic environment of West Kent so that a review of the impact from this scheme on the heritage assets’ significance, including their settings, can be undertaken. A key part of the significance of a heritage asset is being able to appreciate its environment and its period context. Low flying aircraft, increased flight numbers, increase in pollution from aviation fuel and increased traffic through Kent may have an impact on the designated and undesignated historic buildings in Kent. This could particularly the case for the four historic buildings within the high-status residences, such as Squerryes Court, Chiddingstone and Chartwell. The historic buildings within the villages along the A25, such as westerham and Brasted, and along the A264, such as Ashurst, could also be affected. An indirect impact could be the detrimental effect on the	Negative	The Applicant has assessed the likely impacts of air noise on designated heritage assets using the methodology commissioned by English Heritage (now Historic England) and published in 2014 ( <i>Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England</i> , usually shortened to Aviation Noise Metric and sometimes as known as the Temple methodology). This report is named in paragraph 5.194 of the Airports NPS as the appropriate guidance document for the assessment of air noise impacts on heritage assets. The methodology is explained in Section 4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> [APP-101].  Application of the methodology found that the Project would not result in any impacts on the significance of designated heritage assets in Kent.  Rows 2.13.4.3 and 2.13.3.7 of the <b>Statement of Common Ground between Gatwick Airport Limited and Historic England</b> [REP1-035] set out the

	<p>setting of the more isolated but high-status historic buildings, especially in terms of the impact on the understanding and appreciation of medieval and post medieval components. This impact on setting and on the buildings themselves, may lead to increase in restoration and maintenance costs and decrease in income generated from tourism, wedding venues, film locations etc. Section 7.9 of Environmental Statement – Chapter 7 Historic Environment [APP-032] focuses on the immediate site of Gatwick Airport and its adjacent areas. There is no assessment of increased noise, visual or pollution impact on Historic Buildings despite clear increases being demonstrated in Environmental Statement – Chapter 14 Noise and Vibration [APP-039]. For example, APP-039 identifies a significant increase in overflight of Hever Castle which will have a detrimental impact on the historic building. Other historic buildings that need to be assessed and considered are Penshurst Place and Chiddingstone Castle, along with those located within the Conservation Areas of Markbeece, Chiddingstone, Hoath Corner and Royal Tunbridge Wells historic spa town. Until a Historic Environment Assessment of West Kent heritage is undertaken with a suitable impact assessment (the study area should be agreed with KCC’s Heritage team), it can only be assumed that the Northern Runway project will have a negative impact on historic buildings in West Kent.</p>		<p>position of Historic England thus ‘<i>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’ and ‘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 from the scheme proposals’.</i></p>
<p>Heritage Conservation Impact B – Impact on Archaeology</p>	<p>The Northern Runway proposals are unlikely to have a direct impact on Kent’s archaeological remains. However, there may be impact from additional overflying aircraft on the setting of some archaeological sites, such as Squerryes Park Hillfort, in terms of appreciation and understanding of their site and situation. Until a Historic Environment Assessment of West Kent is undertaken, it can be anticipated that the Northern Runway Project will have a neutral impact on archaeology in Kent.</p>	<p>Neutral</p>	<p>As above.</p>
<p>Heritage Conservation Impact C – Impact on Historic Landscapes</p>	<p>Historic landscapes could be directly affected by an increase in overflying aircraft and more indirectly by increased road traffic. Aircraft noise would be intrusive and have a negative impact on the appreciation, understanding and enjoyment on the extensive designated parklands, some of which are major tourist sites in Kent. The wider historic landscapes of West Kent are a key part of the historic character of Kent and the tranquillity of the historic areas are valued by residents and visitors. The proposals may also result in a detrimental visual impact on the views from and towards the historic parklands located on the hills, particularly towards the northern part of the study zone.</p>	<p>Negative</p>	<p>As above.</p>



## 5.6 Socio-Economic

5.6.1 The following table sets out the Applicant's response to matters raised on Socio-Economics.

**Table 5.5: The Applicant's response to matters raised on Socio-Economic**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant's Response
<b>Socio-economic Impact A – Economic Benefits to Kent</b>	KCC acknowledges the potential benefits from the Project in terms of economic activity, employment and tourism, as stated in the Needs Case [APP-250] under construction, operational and wider economic impacts. These benefits would largely be brought about by the improvements in resilience and operational performance of the airport that the proposed interventions should deliver. KCC appreciates that Kent would enjoy some share of these benefits, as part of the 'six authorities area', bringing a positive impact of the Project to the County.	Positive	The Applicant notes and welcomes Kent County Council's position in relation to socio-economic impacts.
<b>Socio-economic Impact B – Skills and Employment</b>	Expansion at Gatwick, as a result of the Northern Runway proposals, has the potential to boost skills and employment in not just the immediate area, but the whole of the South East. The Applicant's Employment, Skills and Business Strategy (ESBS) [APP-198] outlines Gatwick Airport Limited's ambitions to maximise on the opportunities the Project offers to improve skills, employment prospects, and business. It is often argued that Kent experiences mainly the negative impacts of the airport but benefits very little. Therefore, successful delivery of the ESBS has the potential to ensure some of the economic benefits from the Northern Runway Project are shared with the wider area, including Kent and is therefore a positive impact.	Positive	The Applicant notes and welcomes Kent County Council's position in relation to socio-economic impacts.

## 6 Sevenoaks District Council

### 6.1 Overview

6.1.1 This section sets out the Applicant's response to the points raised within the Local Impact Report submitted by Sevenoaks District Council [[REP1-095](#)]. The Applicant has retained the headings and structure of the Local Impact Report below.

### 6.2 Socio-Economics

6.2.1 The following table sets out the Applicant's response to matters raised on Socio-Economics.

**Table 6.1: The Applicant's response to matters raised on Socio-Economics**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant's Response
<b>4.2 and 4.3</b>	It is considered that the proposal would bring many benefits to the region, including the creation of 14,000 jobs and £1 billion into the economy each year, and there is no doubt that Sevenoaks District would benefit from this. With inbound visitors to the UK forecast to reach 37.5 million this year with a significant proportion of these travelling to London and the South East, it is clear the significant contribution London Gatwick Airport plays in supporting the thriving tourism industry in Sevenoaks District, alongside local, regional and national economies.	Positive	The Applicant notes and welcomes Sevenoaks District Council's view on socio-economic impacts.

### 6.3 Traffic and Transport

6.3.1 The following table sets out the Applicant's response to matters raised on Traffic and Transport.

**Table 6.2: The Applicant's response to matters raised on Traffic and Transport**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant's Response
<b>4.6</b>	It is considered that some elements of the project are positive but will have little benefit to Sevenoaks District directly, and as such can be recorded as neutral local impacts. The road improvements, car parking and active travel routes for example, are all localised and will help in relieving pressure for this infrastructure in and around the airport, but do not assist in improving accessibility between the District and London Gatwick Airport.	Neutral	This is noted. The proposals in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [ <a href="#">APP-090</a> ] include support for a new coach route between Chatham, Maidstone, Sevenoaks and Gatwick which would improve public transport accessibility between Sevenoaks District and the Airport.
<b>4.11</b>	The proposal would also impact the District's transport network, and it is anticipated that the proposal would result in an increase in passengers driving to London Gatwick Airport of 40%, resulting in additional traffic on the M25, M26, A21 and A25, particularly during peak hours. The proposed	Negative	Comprehensive strategic and microsimulation modelling work has been undertaken to assess the traffic impact of the Project (see Chapters 12 and 13 of the <b>Transport Assessment</b> [ <a href="#">AS-079</a> ]). Based on the modelling work, the Project is not expected to result in significant adverse effects which require

	transport provisions do not assist in improving accessibility between the District and London Gatwick Airport and therefore our strategic road network will be further strained without any mitigating transport improvements.		mitigation additional to the highway works which form part of the Project. Diagrams 12.3.2 and 12.3.3 of the <b>Transport Assessment</b> [AS-079] indicate the proportional of airport traffic on the wider highway network, which shows the majority dissipates along the strategic highway network.
4.12	Whilst we recognise the positive impacts of the recent railway station upgrade works at London Gatwick Airport, particularly in relation to increasing capacity, we are concerned about the lack of wider rail infrastructure proposed to support the airport’s expansion, given the expected increase in airport passengers associated with the project. It is understood that there is a clear strategic case for improving and extending rail services from London Gatwick Airport to West Kent, but that, disappointingly, barriers to funding prevent these improvements from being delivered. Improved rail services between the airport and West Kent would bring significant benefits to our communities and businesses within Sevenoaks District, as well as the airport, including shorter and more frequent journey times, the provision of genuine travel choice, reducing pressure on the District’s strategic road network and helping to reduce carbon emissions. Given that no mitigation is currently proposed in respect of the impact that the project will have on the District’s road network and on carbon emissions (see paragraph 4.11), it is our view that London Gatwick Airport should be contributing significantly more to enable the delivery of improved and extended rail services to better connect the airport with West Kent. It is therefore essential that a comprehensive and sustainable transport strategy is committed to and developed, working with wider national and regional transport partners to address this issue.	Negative	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of <b>Transport Assessment</b> [AS-079] and <b>ES Chapter 12</b> [AS-076]. The assessment shows no significant increase in crowding on rail services is expected as a result of the Project and no measures are required to mitigate the impact of the Project on rail services.</p> <p>GAL supports the principle of increasing direct rail services between the Airport and Kent but recognises that Network Rail has no specific plans at this time; GAL is therefore committing to provide additional regional bus and coach services to and from the County as part of the measures set out in <b>ES Appendix 5.4.1: Surface Access Commitments</b> [APP-090]. GAL will continue to work with Network Rail and Train Operators on potential future improvements.</p>

## 6.4 Noise

6.4.1 The following table sets out the Applicant’s response to matters raised on Noise.

**Table 6.3: The Applicant’s response to matters raised on Noise**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
4.7	Our communities living in the southern part of Sevenoaks District (Edenbridge, Cowden, Hever, Penshurst etc) already experience adverse disturbance from aircraft noise. If the proposal is implemented as per the application, the situation for them would be made much worse. Whilst there	Negative	Air noise is assessed for an average summer day. <b>ES Chapter 14: Noise and Vibration</b> 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. <b>ES Chapter 14: Noise and Vibration</b> [APP-039] Table 14.7.1. ES

	<p>may be wider advantages to not increasing the number of flight paths, unfortunately this will severely impact those communities already experiencing noise disturbance, as aircraft movements are expected to increase by 35%. Furthermore, these areas are predominantly rural, and as such benefit from a quieter baseline noise which makes aircraft noise more intrusive.</p>		<p>Chapter 14 provides a full assessment of air noise impacts in this area and concludes the effects will not be significant. The relevant guidance for air noise assessment makes no provision for accounting for ambient noise levels. The applicant has submitted at Deadline 2 an Ambient Noise Study carried out for the Noise Management Board in 2018 that researched if aircraft noise could generate greater annoyance where ambient noise levels are low, and concluded there is no evidence for such effects.</p>
4.8	<p>Increased noise pollution is also a concern of our national and regional tourist attractions operating in the rural southern part of Sevenoaks District, including but not limited to Hever Castle, Penshurst Place, Chartwell and Knole Park. Notwithstanding the comments made in paragraph 4.3 regarding the significant contribution London Gatwick Airport makes in supporting the thriving tourism industry in Sevenoaks District overall, these nationally important heritage assets and tourist attractions currently benefit from tranquil settings, which are a vital aspect of their appeal to the public and consequently their ability to contribute to the local economy and to local employment. The increased occurrence of aircraft movements by 35% will exacerbate noise disturbance and negatively impact the tranquil settings they currently enjoy, which may adversely affect the visitor experience</p>	Negative	<p>A tranquillity study has been undertaken within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033] in accordance with an appropriate methodology (to accommodate specific criteria in CAA CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated using heat maps in <b>ES Landscape, Townscape and Visual Resources – Part 2</b> [APP-061] Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The assessment is based on the increase of up to 20% in overflying aircraft up to 7000 ft above local ground level as a result of the Project, compared to the future baseline scenario in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Hever Castle and Knole Park). It is considered that the increase in overflights will be discernible to some people and imperceptible to others. 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 has been identified it is not considered to constitute significant harm to this perceptual quality.</p>
4.9	<p>It is understood that London Gatwick Airport will commit to a legally binding noise footprint, which over time will reduce even though there will be more flights, owing to the introduction of new, quieter aircraft technology which has already made a significant difference, with the airport's noise footprint reducing by 41% over the past 20 years. However, there is little clarity on how the airport will directly achieve this. The modelling undertaken makes assumptions about future fleet replacement in order to reduce noise, but we question whether this is genuinely achievable given that decisions about fleet replacement lie outside of the airport's control.</p>	Negative	<p>The council's acknowledgment that the introduction of new quieter aircraft technology has already made a significant difference is noted. GAL expects this trend to continue as discussed in <b>ES Appendix 14.9.5: Air Noise Envelope Background</b> [APP-175]. GAL has taken a precautionary review of the rate at which fleet transition will continue, referred to in the noise assessment as the slower transition fleet. The noise envelope committing the Applicant to lower noise levels in the longer term is based on the slower transition fleet in order to provide certainty that the noise limits will be able to be achieved as will be required. The Project's declaration of impacts and its Noise Insulation Scheme are also consistently based on the effects of growth with a slower transition fleet.</p>
4.10	<p>The airport will also introduce an enhanced noise insulation scheme for those properties most affected by noise. This is welcomed but lacks clarity</p>	Negative	<p>The geographic areas covered by the <b>ES Appendix 14.9.10 Noise Insulation Scheme Updated</b> [REP2-031] are shown in ES Figure 4.8.1 and on the online</p>

	on the geographical areas to benefit from this. We would request that our communities living in the southern part of Sevenoaks District are included in the scheme.		air noise viewer, the link to which is provided in ES paragraph 14.9.80. The areas covered are in line with policy requirements and practice at other airports. The outer zone does cover only a small part of Sevenoaks District where this lies within the outer edges of the noise contour area.
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## 6.5 Climate Change / Greenhouse Gases

6.5.1 The following table sets out the Applicant’s response to matters raised on Climate Change / Greenhouse Gases.

**Table 6.4: The Applicant’s response to matters raised on Climate Change / Greenhouse Gases**

Ref No.	Description of Impact	Negative / Neutral / Positive	Applicant’s Response
4.11	This will also have a significant negative impact on the District’s carbon emissions as we already know that the transport sector accounts for 61% of our overall carbon emissions, making the District’s work on tackling the challenge of climate change much more difficult, particularly given that there is no mitigation proposed by the airport.	Negative	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. Section 16.4 of <b>ES Chapter 16: Greenhouse Gases [APP-041]</b> 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> The impact of the Project has been assessed in line with relevant regulations and guidance as set out in Section 16.4 of <b>ES Chapter 16: Greenhouse Gases [APP-041]</b> . 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.
4.14	It is understood that London Gatwick Airport is committed to a global low carbon future for aviation, aligning with the wider UK aviation sector’s ambitions to achieve net zero aircraft emissions, supporting the government’s policy to be net zero by 2050. However, there is little clarity on how the airport will directly achieve this, nor is there clarity that new propulsion methods will be in place to remove carbon emissions in the	Negative	With regards to the role of technology in the decarbonisation of the aviation sector in future - this is addressed by the UK Government in its most recent response to the Committee on Climate Change (2023), in which the following was included:  <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</i>

<p>timeframe envisaged. Aviation is recognised as both one of the most carbon-intensive forms of transport and one of the most difficult to decarbonise and so understanding how the airport will achieve its staged targets forms a crucial consideration of the project.</p>	<p><i>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.</i></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 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 (explicitly including the NRP) will not compromise the Government’s commitment to the UK’s net zero trajectory.</p>
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