



Gatwick Airport Northern Runway
National Infrastructure Project

TR020005

Principal Areas of Disagreement Summary Statement

Version **23** (With Track Changes)

Deadline **25** submission ~~26th March~~ **6th June** 2024

Interested Party Reference: 20044737

Introduction

Mid Sussex District Council has significant concerns about the application. In preparing this document, the Council has focused on its principal areas of concern and has aimed to provide as concise a summary as possible of these. The brevity of this document does not reflect the scale of the Council's concerns.

This is Version ~~23~~ of the Principle Areas of Disagreement Summary Statement (PADSS)DSS and updates Version ~~12~~ submitted in ~~October 2023~~ March 2024 (AS-065REP2-049 and REP2-050). A track change and clean version have been submitted at deadline ~~25~~. It identifies the remaining and some new principal area of disagreement that have been identified as further work has been undertaken during the Examination.

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

- Likely – where agreement should be possible, or a relatively simple change is required.
- Uncertain – where an issue is being, or will be, discussed further with the Applicant
- Unlikely – where agreement on an issue is unlikely or it is difficult to identify a solution.

The PADSS covers the following topic areas:

Aviation need, capacity and forecasting

Noise

Air Quality

Climate Change

Green House Gases

Traffic and Transport

Socio – Economic

Historic Environment and Landscape

Draft Development Consent Order

~~The PADSS have been reviewed without reference to the Applicants project changes to the DCO, which were accepted into the Examination by the ExA on 8 March 2024. Commentary on these project changes will provided via a Written Representation to be submitted at Deadline 3 and will be correspondingly handled through the next iteration of the PADSS to be submitted at Deadline 5.~~

~~Work is ongoing between York Aviation and the Applicant regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at Deadline 5, when the ExA request this is next submitted into the Examination.~~

~~Gatwick Airport Limited (GAL) sets out in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made for most air quality matters in this PADSS. It is anticipated that further progress can be made before the next Examination Deadline. Where it has been possible to update the PADSS for air quality text has been added below.~~

Principal Areas of Disagreement Summary Statement (PADSS) from Mid Sussex District Council	Version Number: 23.0 Submitted at: 26 March6th June 2024
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TOPIC: Aviation need, capacity and forecasting				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1.	The capacity deliverable with the Proposed Development	<p><u>Updated position (Deadline 5):</u></p> <p><u>The Applicant has produced updated simulation modelling of the future capacity of the runway with the NRP [REP1-054], which uses more appropriate assumptions about the separations required between departing aircraft but, nonetheless, indicates lower levels of delay. Further information has been sought regarding the calibration of this model to verify that it does not understate delays before it can be agreed that the NRP is capable of delivering the capacity uplift assumed over the longer term [REP4-052]</u></p>	<p><u>Updated position (Deadline 5):</u></p> <p><u>Further information regarding the validation of the updated simulation modelling is required</u></p> <p><u>Full modelling of the interaction between the use of the two runways and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.</u></p>	<p><u>Uncertain</u></p> <p><u>Moderate—subject to GAL transparently undertaking and sharing the relevant simulation modelling.</u></p> <p><u>Please note: Work is ongoing between York Aviation and the Applicant regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at Deadline 5, when the ExA request this is next submitted into the Examination.</u></p>

		<p>Modelling by GAL of the capacity deliverable with the NRP has assumed that 1 minute separations can be achieved between all departing aircraft using the two runways. This is not possible with the existing structure of SIDS, particularly given the commitment not to use WIZAD SID in the night period, and so additional delays to aircraft will arise increasing delays above those stated in the Application documents. As a consequence the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.</p>		
2.	<p>The forecasts for the use of the NRP are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for Transport forecasts and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.</p>	<p>The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (see point above). It is not considered good practice to base long term 20 year forecasts solely on a bottom up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport.</p>	<p><u>Updated position (Deadline 5):</u></p> <p><u>The adoption of the top down forecasts, including an allowance for capacity growth at the other London airports as the base case for the assessment of the impacts of the NRP and the setting of appropriate controls on growth relative to the impacts.</u></p> <p>Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick in competition with other airports, not limited simply to traffic, including demand from other regions of the UK, that have historically used the London airports.</p>	<p><u>Uncertain</u></p> <p>Moderate—subject to GAL producing robust modelling to underpin its forecasts of demand.</p>

		<p><u>Updated position (Deadline 5):</u></p> <p><u>Alternative top-down forecasts have now been presented by GAL [REP1-052] that show slower growth in the early years following the opening of the NRP. These are considered more reasonable than the original bottom-up forecasts adopted by the Applicant but still fail to take adequate account of the extent to which some part of the demand could be met by expansion at other airports serving London including a third runway or other expansion being delivered at Heathrow.</u></p> <p>In this case, top-down benchmarking against national forecasts has failed to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand across the London system (Heathrow, Gatwick, Stanstead, City, Southend, Luton) is reliant on the assumption that a third runway</p>		
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		would be delivered at Heathrow.		
3.	Baseline Case has been overstated leading to understatement of the impacts	There is concern that it is unreasonable to assume that the existing single runway operation will be able to support 67.2 mppa meaning that the assessment of impacts understates the effects, see REP4-049 .	GAL is undertaking sensitivity analysis of alternative baseline assumptions as directed by the ExA. It is considered that the results of this sensitivity analysis should be used as the basis for the assessment of the impact of the NRP and the setting of appropriate mitigations and controls.	Uncertain
4.	Overstatement of the wider, catalytic, and national level economic benefits of the NRP.	<p>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the wider catalytic, and national level economic benefits of the wider NRP in the local area.</p> <p><u>Updated position (Deadline 5):</u></p> <p><u>The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects from other airports, as well as other methodological concerns.</u></p>	<p>GAL must revisit the methodology in the light of these concerns.</p> <p><u>Updated position (Deadline 5):</u></p> <p><u>The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified.</u></p> <p><u>The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</u></p> <p><u>Although the Applicant provided some further explanation in REP3-78 (pages 100-105), the council remains concerned</u></p>	<p><u>Uncertain</u></p> <p>Moderate—The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area.</p>

			<p><u>that the methodology is not robust for the reasons set out at paragraphs 57-60 of REP4-052. It is understood that the Applicant contends that its assessment of the total employment impact of the growth of the Airport is calculated on a net basis, such that any local displacement is accounted for. As a consequence, it is claimed by the Applicant that, to the extent that the direct, indirect and induced impacts may be estimated on a gross employment gain basis, this effect is neutral in terms of the estimate of total direct, indirect, induced and catalytic employment given that the catalytic employment is estimated as the difference between the total net employment gain and the calculated direct, indirect and induced employment. Given the concerns expressed regarding the catalytic impact methodology, the council do not accept that displacement has adequately been accounted for in the employment estimates, not least as no account is taken of the extent to which growth at Gatwick would be displaced from other airports. When coupled with the concerns regarding the catalytic impact methodology as a whole, little confidence can be placed on the reliability of the estimates of net local employment gain.</u></p>	
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TOPIC: Noise				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
5.	Assessment of significant effects for air noise	How the significant effects have been identified and the robustness of conclusions.	Provide a thorough assessment of significant effects that identifies how communities will be impacted by air noise	<u>LikelyUncertain</u>
6.	Assessment of significant effects for ground noise	How the significant effects have been identified and the robustness of conclusions.	Provide a thorough assessment of significant effects that identifies how communities will be impacted by air noise	<u>LikelyUncertain</u>
7.	Methodology used to model air noise	Further detail of the methodology used to model air noise impacts is needed.	GAL should provide more detailed information used to model air noise <u>Updated position (Deadline 5):</u> <u>Details of SEL and LAmax measurements of each aircraft type that underpin air noise modelling should be provided along with the margin of error between predictions and measurements.</u>	<u>LikelyUncertain</u>
8.	Methodology used to model ground noise	Further detail of the methodology used to model ground noise impacts is needed.	GAL should provide additional information used to model ground noise <u>Updated position (Deadline 5):</u> <u>Engine ground running, auxiliary power unit, fire training ground activities and engine around taxi noise should all be included in LAeq,T ground noise predictions.</u>	<u>LikelyUncertain</u>
9	Noise Envelope	Significant concerns relating to the definition, management and enforcement of the Noise Envelope.	A Noise Envelope that is fit for purpose, with a regulatory framework that is able to scrutinise and take action if required. <u>Updated position (Deadline 5):</u> <u>The joint local authorities should be part of a Noise Envelope scrutiny group</u>	Uncertain

10.	Noise Insulation Scheme	Lacks clarity as to what measures will be applied and where.	<p>A fit for purpose scheme that provides mitigation for those properties that will suffer most severe noise impacts.</p> <p><u>Updated Position (Deadline 5):</u> <u>The applicant published revised Noise Insulation Scheme [REP4-017]. Little progress has been made in addressing the JLAs concerns as outline in the West Sussex Joint LIR table 14.1 and paragraphs 14.244 - 13260 [REP1068]. The JLAs have provided a written response at Deadline 5 'Joint Local Authorities Response to the Applicants Deadline 5 Submissions'</u></p>	<u>Likelyuncertain</u>
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TOPIC: Air Quality				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
11.	Assessment Scenarios – there are a number of clarifications required to understand the Assessment Scenarios utilised in the air quality assessment. Such as those scenarios where both construction and operational activities happen at the same time. There are also variations between application documents on how scenarios are described.	The concern is that the scenarios assessed in the ES do not provide a realistic worst case assessment.	<p>Further information is required to understand what scenarios have been assessed.</p> <p>Updated Position (Deadline 5): <u>Gatwick Airport Limited (GAL) sets out in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made for most air quality matters in this PADSS. It is anticipated that further progress can be made before the next Examination Deadline. Where it has been possible to update the PADSS for air quality text has been added below</u></p>	<p><u>Uncertain.</u></p> <p>Please note: For all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567 page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that Mid Sussex is unable to update the resolution status or otherwise on air quality matters within the PADSS. This will be done at the next opportunity within the Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</p>
12.	Study Areas – Further information on the road traffic study area within the air quality assessment is required. Needed to understand which routes have been affected by changes in traffic	Without this information it is not possible to fully understand the air quality assessment of road traffic air quality effects. i.e. which routes are affected in which scenario.	<p>Further information required to understand the study areas that have been assessed, to determine if changes are required.</p> <p>Updated Position (Deadline 5): <u>The Joint Local Authorities have submitted a detailed review of the Air Quality Action Plan [REP2 -004]. Please see REP4-053 for this detailed review. Without a response from GAL</u></p>	<p><u>Likely Uncertain</u></p>

			<u>further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline</u>	
13.	Model verification – remains a series of queries to be considered to establish if the air quality model verification is robust. For example, no reference is made to 2022 data which should have been available during the preparation of the air quality assessment	The concern is that air quality predictions may not be as robust.	Further information is requested to understand how robust air quality predictions are. <u>Updated Position (Deadline 5):</u> <u>The Joint Local Authorities have submitted a detailed review of the Air Quality Action Plan [REP2 -004]. Please see REP4-053 for this detailed review. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline</u>	<u>Likely Uncertain</u>
14.	Air Quality Action Plan - A combined operational air quality action plan (AQAP) has not been prepared to draw together carbon action plan and surface access commitments. It is also noted that the approach differs from previous discussions where a draft AQAP was provided in 2022. The proposed air quality action plan could be informed by monetisation of air quality impacts.	This is a matter of local concern as shown in the local guidance prepared by Sussex authorities in 2021.	<u>Updated Position (Deadline 5)</u> <u>A draft AQAP (Annex 5 of draft s106 [REP2-004]) was provided by GAL on 26 March 2024. Disappointingly, the draft AQAP simply summarises the measures within the carbon action plan, surface access commitments and construction code of practice, with no commitment to additional targeted measures. No additional information has therefore been provided which addresses the Council's concerns.</u> <u>The Joint Local Authorities have submitted a detailed review of the Air Quality Action Plan [REP2 -004]. Please see REP4-053 for this</u>	Uncertain

			<p><u>detailed review. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline</u></p> <p>Further information on the monetisation of air quality impacts and further liaison is proposed to discuss the potential benefits of a targeted approach to the continued development of an AQAP.</p>	
15.	<p>Operational air quality monitoring – linked to the uncertainty around the effectiveness of modal shift measures.</p> <p>There is no information of how air quality data will be reviewed to check that change are not more adverse than predicted, nor what measures would be taken is a significant adverse deterioration was monitored.</p>	<p>The concern is that it is unclear how operational monitoring would trigger air quality mitigation</p>	<p><u>Updated Position (Deadline 5)</u></p> <p><u>Outstanding areas of concern relating to air quality, were provided by AECOM on behalf of the JLAs at Deadline 3 [REP3-117 – Appendix A]. GAL’s states [REP4-031 para 3.7.7] that its response to these air quality concerns will be provided by Deadline 5.</u></p> <p><u>Without a response from GAL to these technical air quality issues the Council is unable to update the resolution status of concerns relating to operational air quality monitoring.</u></p> <p>Further information is requested to understand how air quality will be monitored, evaluated and reported to local authorities along with the further steps that would be taken should air quality deteriorate further than predicted. Thereafter, it can be confirmed what amendments may/may not be required etc.</p>	Uncertain
16.	<p>Habitat Regulation Assessment - The HRA utilises the predicted air quality results for NOx, ammonia and nitrogen</p>	<p>The concern is that the scenarios utilised do not represent a realistic worst case for the Proposed Development.</p>	<p>Clarification on scenarios is required, as described above in the air quality chapter review.</p>	Likely

	<p>deposition to determine whether there are habitat integrity risks to European designated sites. The HRA concludes there are none in relation to air quality both for the proposed development in isolation and in combination. However, this is based on the scenarios assessed within the air quality chapter that need further review to determine if the scenarios represent a realistic worst case.</p>		<p><u>Updated Position (Deadline 5)</u> <u>Outstanding areas of concern relating to air quality, were provided by AECOM on behalf of the JLAs at Deadline 3 [REP3-117 – Appendix A].</u> <u>GAL's states [REP4-031 para 3.7.7] that its response to these air quality concerns will be provided by Deadline 5.</u></p>	
<p><u>17.</u></p>	<p><u>Air Quality and Emissions Mitigation Guidance for Sussex</u></p>	<p><u>The applicant has not clearly demonstrated regard to the Sussex Air Quality and Emissions Mitigation Guidance or the Defra air quality damage cost guidance in assessing air quality impacts and mitigation measures. The health/damage costs are not included in the DCO documents despite confirmation from the applicant that they would be undertaking a TAG (Transport</u></p>	<p><u>Updated position (Deadline 5):</u> <u>The JLAs response at D4 [REP4-042 para 2.34- 2.38] also discusses how the AQAP fails to address local air quality effects in line with the Air Quality and Emissions Mitigation Guidance for Sussex (the “Sussex Guidance”).</u></p> <p><u>The purpose of the Sussex Guidance is to assess the health impacts from the additional emissions associated with the development and to provide mitigation a local level proportionate to the value of the damage to health.</u></p>	

		<p><u>Analysis Guidance) assessment which would identify the air quality damage costs of the Project. The underlying rationale of the Sussex Guidance is to quantify health damage costs associated with the transport emissions from the proposed development (NO2, M10/2.5) in order to offset these damages to protect human health. This approach is in line with the principals of Defra's Clean Air Strategy.</u></p>	<p><u>The Applicant doesn't accept that any additional Project related mitigation is necessary because they have not identified significant impacts. This approach is not consistent with the principles of the Sussex Guidance, which aims to offset the health effects of non-threshold pollutants irrespective of the significance assessment.</u></p> <p><u>The JLAS have addressed this point in their D4 response [REP4-042 para 2.39- 2.43] and detailed review of the AQAP [REP4-053].</u></p> <p><u>A response from GAL on these D4 submissions is awaited to progress discussions</u></p>	
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TOPIC: Climate Change				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
17	Baseline Information—time periods for climate change projections are not far enough into the future to represent the worst case scenarios	The most distant time period chosen for assessment was 2040-2069 (2060s) (paragraph 15.5.2 of ES Chapter 15 Climate Change), however, some asset components are assumed to be operational in perpetuity. These climate change projections are not adequately far enough into the future to represent the worst case scenario.	The Applicant should collect additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are accounted for. Data available includes:- PPCE (Probabilistic Projections of Climate Extremes) for future climate extremes—available between 1961 and 2100. Probabilistic projections (25km)—up to 2070-2099 (2080s) is available.	Likely Addressed at Deadline 2
18	Inconsistency and lack of detail in some climate impact statements.	The climate impact statements (detailed in ES chapter 15 Table 15.8.5 and Table 15.8.6) are lacking in consistency in the way they are articulated in that some are missing an 'impact'. They have a cause e.g. 'increased flooding' and an 'event' e.g. flooding of electrical equipment' but no end 'impact' e.g. resulting in increased maintenance requirements or resulting in operational downtime. This end result is what should determine the consequence rating and could arguably	The Applicant should update all climate impacts statements to have a clear end impact so that all risks are articulated in a consistent way.	Uncertain Addressed at Deadline 2

		have led to an underestimation of risk.		
19.	Lack of identification of additional mitigation / adaptation measures.	Whilst the Applicant may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures seems to be an omission in the report. If there are design decisions or operational management measures that can be put in place to increase resilience they should be noted and communicated along with an indication of who is responsible and the timing of implementation. For example, Appendix 5.3.2 Code of Construction Practice lists a number of 'options for climate resilience measures' which should also be included in this report.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the project's vulnerability to climate change.	Uncertain Addressed at Deadline 2
20.	Disagree with the assessment that 'cumulative effects are not relevant'	We understand that a conclusion may be drawn that cumulative impacts from nearby projects may be 'insignificant', but we disagree with the statement that 'An assessment of cumulative effects is not relevant'. For example, nearby projects could exacerbate the urban	The assessment should be reconsidered and reworded to reflect that it is not irrelevant.	Likely Addressed at Deadline 2

		heat island impact of the project or increase the impact of flooding to the site or access to the site.		
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	TOPIC: Greenhouse Gases			
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
21.	Jet Zero Aviation policy	Assessment fails to consider the risks of the Jet Zero Aviation policy and how this could compromise the UK's net zero trajectory.	Identified issues to be addressed.	Likely Addressed at Deadline 2
22.	Cumulative impact	GAL have not assessed the cumulative impact of the project in the context of the overall UK airport expansion in passenger numbers.	Identified issues to be addressed.	Likely Addressed at Deadline 2
23.	Assessment methodology	No carbon calculations for well to tank emission and conversions from CO ₂ to CO ₂ e have been undertaken. Such calculations could potentially increase the total emissions by around 20%. Therefore, millions of tonnes of CO ₂ e are not accounted for, which is non-compliant with the GHG Protocol Corporate Accounting Standard and GHG accounting best practice.	Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%. <u>Updated Position (Deadline 5):</u> <u>In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total emissions from the project between 2018 and 2050 by 3,978,000 tCO₂e, representing a 19.83% increase.</u> <u>To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant</u>	Likely

			<p><u>compares only this portion of aviation WTT emissions to the carbon budget, along with the WTT emissions from construction, ABAGO, and surface access.</u></p> <p><u>The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES.</u></p> <p><u>The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is decarbonising in line with the estimated net zero trajectory.</u></p>	
24.	<u>The unsustainable growth of airport operations may result in significant adverse impacts to the climate.</u>	<u>The increased demand in GAL's services may lead to unsustainable surface access transportation and airport operation growth, which may significantly impact the climate.</u>	<p><u>To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided.</u></p> <p><u>Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation.</u></p> <p><u>Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established.</u></p> <p><u>Should any exceedances of these defined limits occur, the Applicant must cease project activities.</u></p>	<u>Uncertain</u>

			<p><u>Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism.</u></p> <p><u>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:</u></p> <ul style="list-style-type: none"> <u>o additional in that would not have occurred in the absence of the project</u> <u>o monitored, reported and verified</u> <u>o permanent and irreversible</u> <u>o without leakage in that they don't increase emissions outside of the proposed development</u> <u>o Have a robust accounting system to avoid double counting and</u> <p><u>Be without negative environmental or social externalities.</u></p>	
25.	<p><u>If the Applicant does not provide infrastructure or services to help decarbonise surface transport emissions it may have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net</u></p>	<p><u>The Applicant must actively promote the transition to a decarbonised economy, incentivising airport users to adopt low-carbon technologies like electric cars and public transportation systems.</u></p>	<p><u>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure.</u></p> <p><u>Additionally, to support this movement, the Applicant should support a Green Bus Programme such as the expansion of the network of hydrogen buses used in the</u></p>	<p><u>Addressed</u><u>Uncertain</u></p>

	<u>zero targets cannot be identified.</u>		<u>Gatwick/Crawley area into Mid Sussex with accompanying infrastructure.</u>	
26.	<u>GAL does not identify the risks associated with using carbon offset schemes.</u>	<p><u>Document 5.4.2, Section 1.14</u></p> <p><u>This states that, "In 2016/17, we achieved 'Level 3+ - Neutrality' status under the Airport Carbon Accreditation scheme, which is a global carbon management certification programme for airports (Ref 1.1). GAL has been working hard to reduce carbon emissions under GAL's control (from a 1990 baseline) and offset the remaining emissions using internationally recognised offset schemes."</u></p> <p><u>The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme</u></p>	<p><u>GAL should state if they comply with the Airport Carbon Accreditation Offset Guidance Document which specifies the type of offsetting Schemes that need to be used.</u></p> <p><u>In addition, and where reasonably practical, GAL should seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be:</u></p> <ul style="list-style-type: none"> <u>• additional in that would not have occurred in the absence of the project</u> <u>• monitored, reported and verified</u> <u>• permanent and irreversible</u> <u>• without leakage in that they don't increase emissions outside of the proposed development</u> <u>• Have a robust accounting system to avoid double counting and</u> <u>• Be without negative environmental or social externalities.</u> 	<u>AddressedLikely</u>

TOPIC: Traffic and Transport				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
27.	Traffic & Transport section of Environmental Statement (Chapter 12 Traffic & Transport [APP-037]) undertaken in accordance with historical and replaced guidance.	<p>The Traffic & Transport Chapter has been undertaken in accordance with guidance contained within Guidelines for the Environmental Assessment of Road Traffic (IEMA 1993). New IEMA guidance entitled, Environmental Assessment of Traffic and Movement, which updates and replaces the referenced 1993 guidance, was issued in July 2023. Further details are available here:</p> <p>This information also has implications for the assessment of Air Quality</p>	The Traffic & Transport Chapter should be reviewed to ensure it accords with the relevant latest IEMA guidance. It should be amended if necessary.	<p>Uncertain</p> <p><u>Resolved at Deadline 2</u></p>
28.	Surface Access Commitments (SACs) and target mode shares	<p>Concerns are held about the SACs that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these commitments.</p> <p>There is considered to be a lack of detail and robustness</p>	<p>SACs to be reviewed and amended.</p> <p><u>Updated Position (Deadline 5): Concerns remain that there is insufficient mitigation and controls within the SACs (REP3-028) to ensure that the modal split commitments are delivered. This matter is subject to ongoing discussion through negotiation on the S106 agreement.</u></p>	Uncertain

		<p>to the SACs and lack of clarity or suitable control should the SACs not be met. The Highway Authority is advocating an alternative approach similar to that adopted by Luton Airport to control growth against meeting surface access modal splits. The specific concerns, relating to the SACs, are set out in the Joint West Sussex LIR but include:</p> <ul style="list-style-type: none"> • Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020. • Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit significant increases in car trips to and from the airport. 	<p><u>The JLA submitted an Introduction to a proposal for an Environmentally Managed Growth at Deadline 4 [REP4- 050] and will provide fuller Framework at a later deadline.</u></p>	
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		<ul style="list-style-type: none"> • Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable and active travel infrastructure to successfully meet the some of the target modal splits. • Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The Applicant has not assessed or considered the attractiveness of modes or how this could be increased. • Should the SACs not be met the proposed approach allows for higher levels of vehicular traffic than is targeted by the SACs for a substantial period of time. The Applicant will produce an Action Plan to address the failure to meet the targets. This does not provide sufficient control and the Highway Authority 		
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		<p>advocate a Green controlled Growth approach, similar to that adopted by Luton Airport.</p> <p>We are also concerned about how they will help deliver improvements to sustainable travel modes in Mid Sussex.</p>		
29.	Lack of Car Parking Strategy	<p>Without an overarching Car Parking Strategy the need cannot be understood and neither can future car parking demand be robustly managed.</p>	<p>Car Parking Strategy to monitor and manage on-site and off-site airport related parking.</p> <p><u>Updated position (Deadline 5):</u> <u>The Applicant has submitted a Car Parking Strategy [REP1-051], and further information about car parking provision has, most recently, been supplied at [REP4-019] in response to Rule 17 letter. However, MSDC still has concerns about the exclusion of 2,500 passenger spaces through robotic parking from the DCO (applicant proposes that this will come forward PDR). It also has concerns about the omission of some on-airport parking from its parking calculations, which could mean that the parking provision calculations are not accurate, which could have implications for the achievement of SACs.</u></p> <p><u>MSDC also has concerns about the level of funding for off- airport parking enforcement that has been offered in the draft S106. This is currently under ongoing discussion through negotiation on the S106 agreement.</u></p>	<p><u>Uncertain Likely</u></p> <p>Note: The Applicant submitted a Car Parking Strategy at Deadline 1 (REP1-051). The JLAs have made a number of comments on this document, including matters for the Applicant to address. These are set out in the WSCG JLAs response to documents published at Deadline 1.</p>

			<u>Further detail is provided in the West Sussex Joint Local Authorities Deadline 5 submission "Response to Applicants Deadline 4 Submission"</u>	
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TOPIC: Socio-Economic				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
	Assessment Methodology – <u>out of date data</u>	Several of the baseline data sources in ES Chapter 17 Socio-Economic [APP-042] and Appendix 17.9.3 [APP-201] are out of date which is a concern given the reliance on these sources to inform the various assessments. Up-to-date baseline data should be sourced to inform assessments. This should include obtaining relevant data from local authorities.	Assessment undertaken using up to date information <u>Updated Position (Deadline 5):</u> <u>MSDC note that the Applicant has in some cases revisited its assessments with more recent data. However, in the absence of detailed local level analysis, it is difficult to accurately gauge the local impacts of the project.</u>	<u>Likely Uncertain</u>
	Assessment Methodology – <u>Consideration of effects at District level</u>	Despite being raised as a gap in the assessment at several Socio-economic Topic Working Group meetings, there is still no assessment of effects undertaken at a local authority level. The impacts of the project on key variables such as employment, labour market, housing (including affordable), social infrastructure and temporary accommodation need to be assessed given they affect both functioning and decision making at the local level.	GAL should undertake an assessment of project impacts on each local authority located within the Northern West Sussex Functional Economic Market Area (FEMA) to adequately understand the extent of impacts at a local level. <u>Updated Position (Deadline 5):</u> <u>No Change. In the absence of detailed local level analysis, it is difficult to accurately gauge the local impacts of the Project.</u>	Uncertain
	Magnitude of impacts definition	Appendix 17.9.3 Paragraph 17.4.25 [APP-201] presents tables defining the scale of magnitude of impacts for construction and operational periods of the project. The use of numbers and percentages to quantify impact can be challenging especially given all study areas are different and can be influenced by a number of different factors.	The Applicant should review these numbers to determine their appropriateness given the study areas for the project. The Applicant should also provide the rationale for the job ranges provided. <u>Updated Position (Deadline 5):</u> <u>No change.</u>	Uncertain

		It is not clear how these the ranges were defined to inform the assessment.		
	Assessment of impacts on labour supply	Appendix 17.9.3 Paragraph 5.2.14 [APP-201] states that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area (Croydon and East Surrey) where the project tips surplus into supply in a single year. The basis for this conclusion does not appear robust, as based on the analysis the project is shown to exacerbate labour shortfall issues across multiple areas. Furthermore, if underlying inputs in the model are changed to reflect the fact that the labour market is already more constrained as has been modelled, it is likely shortfalls would be greater across many of the areas.	Given the limitations in its approach, the Applicant justify the basis of the assessment which concludes that the project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area. The applicant should revisit the assessment which should be undertaken at a local authority level. <u>Updated Position (Deadline 5):</u> <u>No change.</u>	Uncertain
	Economic Skills and Business Strategy [APP-198] - Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why the Applicant is unable to provide further details on these arrangements within the ESBS in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs.	The Applicant as part of ESBS should provide more detail on potential tailored initiatives that would specifically align with and support local communities. This should include relevant baseline information to demonstrate local need, which should appropriately consider the variations between local authorities. The Applicant should provide some details on performance, financial management, monitoring and reporting which can be developed further as part of an Implementation Plan. The Applicant should also clearly explain the difference of BAU and DCO scenarios in terms of provision & outputs. A route map should be provided which explains the process from ESBS to Implementation Plan, aligned to areas of identified local need and outcomes.	Uncertain

	Implementation Plan is not identified.	provision and outputs offered in a Business as Usual (BAU) scenario. Furthermore, the ESBS does not set out any process for how the Implementation Plan would be developed. Given the Applicant is currently suggesting that the majority of the relevant content for the local authorities will be set out in the Implementation Plan, it is essential that the Applicant provides further details on the process for delivering this.	<p><u>Updated Position (Deadline 5):</u> <u>The applicant submitted an Implementation Plan (IP) at Deadline 3 [REP3-069]. The applicant has held a further workshop with JLAs to discuss the detail of the IP. It is understood that the applicant will submit a revised IP at a later deadline, taking into account feedback from JLAs. MSDC will provide further comments once revised version is available.</u></p>	
	<u>Operational effects</u>	<u>Assessment of operational labour market effects, effects on affordable housing needs to be revisited. We have outlined our concerns above in relation to the magnitude criteria being used for this assessment and the sensitivity grading of this receptor for the LMA and FEMA. The Applicant also hasn't undertaken any assessment at local authority level.</u>	<u>The Applicant should revisit this assessment based on the comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA, providing a qualitative commentary to explain the implications rather than just signposting to numeric tables.</u>	<u>Uncertain</u>
	<u>The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local affordable housing need</u>	<u>There needs to be a more granular assessment of housing delivery in the area, in particular the unmet affordable housing need to inform the assessment.</u>	<u>The Applicant should revisit the assessment and undertake a more granular assessment of affordable housing delivery to take account of existing constraints. Further justification should be provided and reviewed against past performance to substantiate the conclusions.</u>	<u>Uncertain</u>

	<p><u>Impacts on affordable housing</u></p>	<p><u>ES Appendix 17,.9.143 [APP-201] paragraph 7.5.1 recognises that the project is likely to generate demand for affordable rented housing which is greater than the number of homes in the existing stock. If this exercise is done at a local authority level, then the figures are very different and the true impacts at local authority level are being hidden.</u></p> <p><u>Secondly, assessment goes on to conclude that despite the demand from the project being skewed towards affordable housing, there are unlikely to be impacts on affordable housing beyond what is emerging or planned for. However, analysis of completions by local authority (Table 7.4.1) has demonstrated that the delivery frequently does not meet the need, and therefore a shortfall is likely. On that basis, the conclusion that the project is unlikely to have any impact on affordable housing demand beyond what is planned for does not appear well founded.</u></p> <p><u>The Applicant acknowledges at paragraph 17.9.68 of the Environmental Statement [APP-042] that potential tenure demands associated with the Project are likely to be slightly skewed more towards affordable housing than the existing employment base. Given that Mid Sussex and the wider North West Sussex Housing Market Area, including Crawley and Horsham are unable to meet its existing affordable</u></p>	<p><u>The Applicant should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include liaison with local authorities in the FEMA. The analysis should also take account of other schemes that could need construction workers who may require temporary accommodation.</u></p> <p><u>The council notes the response by the Applicant in REP4-031 to SE.1.15 but considers it cannot be said with certainty that there will be no increase in the need for affordable housing in the North West Sussex Housing Market Area, where there is already a significant unmet need, and remains of the view that a contribution to affordable housing is appropriate.</u></p>	<p><u>Uncertain</u></p>
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		<p><u>housing need, and that Mid Sussex , it follows that the Project will exacerbate what is an existing unmet need for affordable housing within Mid Sussex. Further detail is provided in West Sussex LIR Paragraphs 18.76 to 18.80.[REP1-068]</u></p>		
	<p><u>Construction Phase Impacts on Temporary Accommodation</u></p>	<p><u>The applicant's assessment of properties available to privately rent, does not reflect current pressures on the sector.</u></p> <p><u>Any increased demand and competition from Non Home Based construction workers for the Project seeking short term private rented accommodation in Crawley, and the surrounding areas will increase the demand pressure still further. This is discussed in further detail in the West Sussex LIR Paragraphs 18.49 to 18.56. [REP1-068]</u></p>	<p><u>The Applicant should review other potential sources that could inform a more up-to-date understanding of available private rented accommodation. This could include liaison with local authorities in the FEMA. The analysis should also take account of other schemes that could need construction workers who may require temporary accommodation.</u></p>	<p><u>Uncertain</u></p>

TOPIC: Historic Environment and Landscape				
	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
	The assessment of the potential for noise impact on the High Weald AONB	The Council is not yet satisfied that there will not be more intensive use of flightpaths that are currently infrequently used (i.e. route 9/WIZAD). The Council is concerned that noise impacts on the High Weald Area of Outstanding Natural Beauty have not been robustly assessed	<p>Provision of robust evidence regarding the use of Route 9 which can then inform a robust assessment of potential increased overflight and noise on noise on the High Weald AONB.</p> <p>Updated position (Deadline 5): <u>In [REP4-031], page 94, the applicant set out its response to the JLA response to NV1.10 'WIZAD Departure Route Controls'. We note that, in response, GAL states that the imposition of a limit on the number of aircraft movements that could use the WIZAD route would "act to unnecessarily limit the operations of the airport and the wider benefits that it will provide". Contrary to previous statements by the Applicant, this appears to confirm what the JLAs have always believed, namely that greater planned use of the WIZAD route will be required in order to ensure that the NRP is capable of delivering the full uplift in runway movements claimed contrary to the Applicant's previous claims that its use will remain purely as a tactical offload route [REP3-038, 14.1AF page 192</u></p>	<u>Likely Uncertain</u>
	The assessment of the potential for noise impact on the Historic Parks and Gardens	The Council is not yet satisfied that there will not be more intensive use of flightpaths that are currently infrequently used (i.e. route 9/WIZAD). The Council is concerned that noise impacts on the Historic Parks and Gardens have not been robustly assessed	<p>Provision of robust evidence regarding the use of Route 9 which can then inform a robust assessment of potential increased overflight and noise on the Historic Parks and Gardens.</p> <p>Updated position (Deadline 5):</p>	<u>Likely Uncertain</u>

			<p><u>In [REP4-031], page 94, the applicant set out its response to the JLA response to NV1.10 'WIZAD Departure Route Controls'. We note that, in response, GAL states that the imposition of a limit on the number of aircraft movements that could use the WIZAD route would "act to unnecessarily limit the operations of the airport and the wider benefits that it will provide". Contrary to previous statements by the Applicant, this appears to confirm what the JLAs have always believed, namely that greater planned use of the WIZAD route will be required in order to ensure that the NRP is capable of delivering the full uplift in runway movements claimed contrary to the Applicant's previous claims that its use will remain purely as a tactical offload route [REP3-038, 14.1AF page 192</u></p>	
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TOPIC: Draft Development Consent Order			
Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
The drafting of the draft DCO	As currently drafted the Development Consent Order does not provide sufficient controls to manage development proposals.	<p>The Draft Development Consent Order to be reviewed taking into account the specific comments made in Relevant Representation and (forthcoming) Local Impact Report.</p> <p><u>Updated Position (Deadline 5): An updated position on the draft DCO was provided at [REP4-062].</u></p>	Likely <u>Uncertain</u>