



# Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Mole Valley District Council – Tracked Version

## Book 10

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## 1 Introduction

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in support 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 for the Department for Transport (the Secretary of State) pursuant to Section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The Application comprises alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. It also includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput capacity. This includes substantial upgrade works to certain surface access routes which lead to the airport. A full description of the Proposed Development is included in **ES Chapter 5: Project Description** (Doc Ref. 5.1).
- 1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the Examination. The purpose and possible content of SoCG is detailed in the Department for Communities and Local Government's guidance entitled 'Planning Act 2008: examination of applications for development consent' (2015), stating:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*
- 1.1.4 The SoCGs between the Applicant and the local authorities comprises several documents, to which this document is one. The Statement of Commonality provides details of the structure and status of the SoCG between all the relevant Interested Parties, including the local authorities. Naturally, the level of detail across the suite of SoCG varies to reflect the nature and complexity of the matter, as well as the position between the parties.
- 1.1.5 This document solely relates to matters between the Applicant and Mole Valley District Council. A summary of the meetings and correspondence that has taken place between the parties is detailed in **Appendix 1** of this document.
- 1.1.6 The engagement between the parties across the breadth of matters is ongoing. Therefore, the SoCG is an evolving document and the detailed wording within it is still being discussed in detail between the parties. Future iterations will be submitted at each deadline; and both parties reserve the right to supplement the matters identified as discussions progress, to ensure it is comprehensive and up to date.
- 1.1.7 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached, and is presented in a tabular form. This SoCG does not seek to replicate information that is available elsewhere, either within the Application and/or Examination documents, referring out where

appropriate. The terminology used within the SoCG to reflect the status between the parties is either:

- “Agreed” to indicate where a matter has been resolved to the satisfaction of the parties.
- “Not Agreed” to indicate a final position where parties cannot agree.
- “Under discussion” to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.
- “No longer pursuing” to indicate that while the Authority may not feel that a satisfactory outcome has been reached, the matter/issue is no longer being pursued.

## 2 Current Position

### 2.1. Agricultural Land Use and Recreation

2.1.1 **Table 2.1** sets out the position of both parties in relation to agricultural land use and recreation matters.

**Table 2.1 Statement of Common Ground – Agricultural Land Use and Recreation Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Agricultural Land Use and Recreation within this Statement of Common Ground.</i>					



2.2. Air Quality

2.2.1 Table 2.2 sets out the position of both parties in relation to air quality matters.

Table 2.2 Statement of Common Ground – Air Quality Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
<b>Assessment Methodology</b>					
2.2.2.1	Lack of costing breakdown for AQ impacts and mitigation Document Ref(s): APP-038, APP-156, APP-042	<p>The Applicant has provided insufficient information to detail how the health impacts from increased levels of air pollution have been calculated across the population as a whole or how costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. Understanding costs is essential to effective and necessary mitigation and is claimed to have been considered under the Socio-Economic Effects of Chapter 17. However, there is no mention of such costs in Chapter 17 and these costings are not clearly and robustly set out.</p> <p><u><a href="#">Deadline 2 Update: 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 we are 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.</a></u></p> <p><b><u><a href="#">Updated Position (Deadline 3): Matter now resolved.</a></u></b></p>	<p>Table 7.2.1 of Needs Case Appendix 1 – National Economic Impact Assessment includes the TAG assessment identifying the air quality damage costs of the Project.</p> <p>The Health and Wellbeing Effects from Changes to Air Quality are fully and comprehensively assessed in ES Chapter 18 Health and Wellbeing (see section 18.8). Overall, the minor adverse air quality assessments reflect that, whilst any reduction in air quality may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health in EIA Regulation terms.</p>	Table 7.2.1 of ES <b>Needs Case Appendix 1 – National Economic Impact Assessment</b> <u><a href="#">[APP-251]</a></u> <b>ES Chapter 18 Health and Wellbeing, [APP-043]</b>	Agreed
2.2.2.2	Ultra-fine particles need to be assessed and mitigated Document Ref(s): APP-038	<p>The Applicant has had insufficient regard to the possible health impacts or levels of ultra-fine particles that could exist, specifically from aviation sources, but from other sources as well (i.e. transport). Ultra fine particles are a known issue with airports (DEFRA/Air Quality Expert Group) and when so many people live in proximity to the airport it seems an obvious thing to have assessed and considered fully. As written (13.2.5, Environmental Statement: Chapter 13 - Air Quality) the significance is underplayed and considered in a token manner in other sections.</p> <p><b><u><a href="#">Version 3 Deadline 5 Response</a></u></b> <u><a href="#">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.</a></u></p>	<p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in the ES health and wellbeing chapter. That assessment considers the emerging scientific understanding of UFPs as a public health issue. The approach follows IEMA 2022 guidance on assessing human health effects in EIA.</p> <p><b><u><a href="#">Updated Position (April 2024): The Applicant has set out provisions in relation to UFPs at Schedule 1, Draft Section 106 Agreement [REP2-004].</a></u></b></p> <p><b><u><a href="#">Updated position (Deadline 5): The Applicant has provided a response to the air quality matter submitted by the JLAs at Appendix A: Response to West Sussex Joint Local</a></u></b></p>	<p><b>ES Chapter 18: Health and Wellbeing</b> <u><a href="#">[APP-043]</a></u></p> <p><b><u><a href="#">Schedule 1 of the Draft Section 106 Agreement [REP2-004]</a></u></b></p> <p><b><u><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4</a></u></b></p>	Under discussion

		<p><a href="#">It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p><a href="#">Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs’ review submitted at Deadline 4 [REP4-053].</p>	<p><a href="#">Submissions</a> (Doc Ref. 10.38)</p>	
2.2.2.3		<p>Despite the significance of understanding costs in order to mitigate impacts, there is no suitable consideration as to the financial implications of identified impacts. Nor is there any information or how said costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. While the presence of cost analysis is alluded to (Appendix 13.3.1, Table 2.1.1 and 13.12.6, (APP-038, APP-156 and APP-042)) and supposedly detailed in Chapter 17, these are absent from Chapter 17 and not clearly and robustly set out. As such, it is the Council’s view that health impacts from air quality implications have not been sufficiently addressed and the submission documents are misleading.</p> <p><b>Version 3 Deadline 5 Response</b>  <a href="#">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.</a></p>	<p>Applicant to provide response at future deadline.</p> <p><b>Updated Position (April 2024):</b> <a href="#">Table 7.2.1 of Needs Case Appendix 1 – National Economic Impact Assessment includes the TAG assessment identifying the air quality damage costs of the Project.</a></p> <p><a href="#">The Health and Wellbeing Effects from Changes to Air Quality are fully and comprehensively assessed in ES Chapter 18 Health and Wellbeing (see section 18.8). Overall, the minor adverse air quality assessments reflect that, whilst any reduction in air quality may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health in EIA Regulation terms.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has provided a response to the air quality matter submitted by the JLAs at Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs’ review submitted at Deadline 4 [REP4-053].</p>	<p><a href="#">Table 7.2.1 of ES Needs Case Appendix 1 – National Economic Impact Assessment</a> [APP-251]</p> <p><a href="#">ES Chapter 18 Health and Wellbeing</a>, [APP-043]<del>n/a</del></p> <p><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38)</p>	Under discussion
<b>Assessment</b>					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
<b>Mitigation and Compensation</b>					
2.2.4.1	Significance of construction and transport management plans Document Ref(s): General	<p>It is not currently clear how the impacts of both construction and transport will be offset/mitigated. To date, the information provided around how and when mitigation will be implemented is both high level and non-committal. It will be through the construction and management plans that authorities and communities can obtain assurance that the AQ impacts will be properly dealt with. To date, there has been no draft management plans which provide the necessary level of detail.</p> <p><b>Updated position (Deadline 1):</b> This response does not align with the commitment provided by GAL in the December 2023 Air Quality TWG to provide an AQAP for the operational phase. Please can GAL confirm this response is out of date.</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>	<p>Section 13.9 of <b>ES Chapter 13 Air Quality</b> [APP-038]</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> (REP1-021)</p> <p><b>ES Appendix 5.4.2: Carbon Action Plan</b> [APP-091]</p> <p><b>ES Appendix 13.8.1: Air Quality</b></p>	Under discussion

		<p>In relation to the construction phase it is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared. This is still requested.</p> <p><b><u>Version 3 Deadline 5 Response</u></b>  <u>The Joint Local Authorities have submitted detailed reviews of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</u></p> <p><u>Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p>	<p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO.</p> <p>The Carbon Action Plan sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access emissions are set out in ES Appendix Surface Access Commitments.</p> <p>Measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities to carry out their LAQM requirements.</p> <p><b>Updated position (Deadline 1):</b> GAL will provide a draft Outline AQAP to the LAs by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting an Outline AQAP into the Examination in due course taking account of any feedback from the LAs.</p> <p>A note explaining the draft Outline CDMP will be shared with CBC for comment by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.</p> <p><b>Updated Position (April 2024):</b> <u>The Applicant has provided a draft Air Quality Action Plan (AQAP) at Appendix 5 of the Draft Section 106 Agreement [REP2-004]. The document sets out measures and monitoring commitments related to air quality and odour management to be undertaken by GAL which are secured under the DCO or s106 Agreement. The Applicant looks forward to receiving MVDC's feedback on the draft AQAP.</u></p> <p><u>The Draft Construction Management Plan (CDMP) has been shared with local authorities for comment on 26<sup>th</sup> March, considering the items set out by local authorities in the SoCG and Local Impact Reports. The Applicant looks forward to receiving the LAs comments in due course.</u></p> <p><b>Updated position (Deadline 5):</b> <u>The Applicant has submitted an updated version of the Construction Dust Management Strategy (Doc Ref. 5.3) at Deadline 5.</u></p>	<p><b>Construction Period Mitigation</b> [<a href="#">APP-161</a>]</p> <p><b>ES Appendix 5.4.1: Surface Access Commitments</b> [<a href="#">APP-090</a>]</p> <p><b>Schedule 1 and Appendix 5 of the Draft Section 106 Agreement</b> [<a href="#">REP2-004</a>]</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice – Annex 9: Construction Dust Management Strategy</b> (<a href="#">Doc Ref. 5.3</a>)</p>	
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<p>2.2.4.2</p>	<p>Clarification around air quality complaints procedure is needed Document Ref(s): APP-082</p>	<p>Paragraph 4.12.7 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice) identifies that a complaints procedure will be established but does not reference the sharing of complaints and resolution with local authorities. This measure is also identified within the site management air quality section as something that will be made available to local authorities.</p> <p><b>Updated position (Deadline 1):</b> The COCP is insufficiently detailed and further information is expected as part of the DCO process.</p> <p>It is welcomed that the applicant is happy to review the wording of the complaints and reporting process to ensure that information on complaints and their resolution is shared in a timely fashion.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Version 3 Deadline 5 Response</b> <a href="#">The Joint Local Authorities have submitted detailed reviews of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</a></p> <p><a href="#">Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p>Measures that will be in place through the construction of the Project including recording dust and air quality complaints are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO.</p> <p>Paragraph 2.2.7 of the CoCP sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP.</p> <p>Management plans will be prepared for specific areas of the Project to reflect any site-specific conditions or measures to mitigate dust impacts (set out in para 5.8.2 of the CoCP).</p> <p>The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing, as confirmed in paragraph 5.8.2 of the CoCP.</p> <p>The applicant is happy to review the wording of the complaints and reporting process with the local authorities during the SOCG meetings.</p> <p><b>Updated position (Deadline 1):</b> A note explaining the draft Outline CDMP will be shared with CBC for comment by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Draft Construction Management Plan (CDMP) has been shared with local authorities for comment on 26<sup>th</sup> March, considering the items set out by local authorities in the SoCG and Local Impact Reports. The Applicant looks forward to receiving the LAs comments in due course.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has submitted an updated version of the Construction Dust Management Strategy (Doc Ref. 5.3) at Deadline 5.</a></p>	<p><b>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</b> <b>ES Appendix 5.3.2: Code of Construction Practice (REP1-021)</b></p> <p><a href="#">ES Appendix 5.3.2: Code of Construction Practice – Annex 9: Construction Dust Management Strategy (Doc Ref. 5.3)</a></p>	<p>Under discussion</p>
<p>2.2.4.3</p>	<p>Need for the Dust Management Plan (DMP) to be considered through the examination Document Ref(s): APP-082</p>	<p>The monitoring portion of Section 5.8 (Environmental Statement: Appendix 5.3.2: Code of Construction Practice) suggests that further detailed plans are needed to design a DMP. This is not considered to be correct and a draft DMP can be developed with the information available at this time, with updates implemented as needed.</p> <p><b>Updated position (Deadline 1):</b> It is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared.</p>	<p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO.</p>	<p><b>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</b> <b>ES Appendix 5.3.2: Code of Construction Practice (REP1-021)</b></p>	<p>Under discussion</p>

		<p>This is still requested and we welcome the commitment to discuss further.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b><u>Version 3 Deadline 5 Response</u></b>  <a href="#">The Joint Local Authorities have submitted detailed reviews of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</a></p> <p><a href="#">Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p>Paragraph 2.2.7 of the CoCP sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP.</p> <p>Management plans will be prepared for specific areas of the Project to reflect any site-specific conditions or measures to mitigate dust impacts (set out in para 5.8.2 of the CoCP).</p> <p>The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing, as confirmed in paragraph 5.8.2 of the CoCP.</p> <p>The applicant is happy to review the DMP requirements with the local authorities during the SOCG meetings.</p> <p><b>Updated position (Deadline 1):</b> A note explaining the draft Outline CDMP will be shared with CBC for comment by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Draft Construction Dust Management Plan (CDMP) has been shared with local authorities for comment on 26<sup>th</sup> March, considering the items set out by local authorities in the SoCG and Local Impact Reports. The Applicant looks forward to receiving the LAs comments in due course.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has submitted an updated version of the Construction Dust Management Strategy (Doc Ref. 5.3) at Deadline 5.</a></p>	<p><b><a href="#">ES Appendix 5.3.2: Code of Construction Practice – Annex 9: Construction Dust Management Strategy (Doc Ref. 5.3)</a></b></p>	
<p><b>2.2.4.4</b></p>	<p>Operational monitoring mechanisms need to be clear Document Ref(s): APP-082, APP-090</p>	<p>Operational monitoring will be very important to understand if changes in air quality are occurring or unacceptably worsening. There is no information in either the Air Quality chapter (Environmental Statement 5.1: Chapter 13) or the Surface Access Commitments document (Environmental Statement 5.3: Appendix 5.4.1) of how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored. Concerns remain that, as presented, key monitoring mechanisms and related management plans (i.e. Dust Management Plan) are deferred for agreement outside of the application stage (e.g. S106) and would not be scrutinised or properly considered as part of the application. For example, operational phase monitoring is discussed in paragraphs 13.9.7 to 13.9.19 of the Environmental Statement. (Appendix 5.3.2: Code of Construction Practice). It is proposed by the Applicant that</p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p>	<p><b>ES Chapter 13 Air Quality [APP-038]</b></p> <p><b><a href="#">Schedule 1 and Appendix 5 of the Draft Section 106 Agreement [REP2-004]</a></b></p> <p><b><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant's Response to Deadline 4</a></b></p>	<p>Under discussion</p>

		<p>a S106 agreement is utilised to address the matter, rather than it forming part of the application which is being assessed. The Council suggests that this is done during the examination to ensure that monitoring is scrutinised and agreed in a timely fashion. Further details of the monitoring, locations, numbers of sites, techniques, funding and how air quality monitoring data will be evaluated against the predictions of the ES and the Surface Access Commitments is not provided by the Applicant.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Version 3 Deadline 5 Response</b>  <a href="#">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.</a></p>	<p>The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) and the impacts from the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occurring as a result of airport activity.</p> <p>Gatwick has worked with Local Authorities over many years to fund air quality monitoring to understand air quality locally. As part of the Project, a commitment will be made in the draft Section 106 agreement to the continuation of current monitoring and additional monitoring at several proposed sites (Chapter 13 Figure 13.1.12).</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Applicant has provided a draft Air Quality Action Plan (AQAP) at Appendix 5 of the Draft Section 106 Agreement [REP2-004]. The document sets out measures and monitoring commitments related to air quality and odour management to be undertaken by GAL which are secured under the DCO or s106 Agreement. The Applicant looks forward to receiving MVDC's feedback on the draft AQAP.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has provided a response to the air quality matter submitted by the JLAs at Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant's Response to Deadline 4 Submissions (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs' review submitted at Deadline 4 [REP4-053].</a></p>	<p><a href="#">Submissions (Doc Ref. 10.38)</a></p>	
<p>2.2.4.5</p>	<p>Air Quality</p>	<p>The Council would also like to raise concerns that it is not confident in the monitoring mechanisms that would need to assess change in AQ levels over time as air traffic movements increase/alter. Monitoring is an essential mechanism that can enable authorities and the airport to respond accordingly for the benefit of communities and public health. It is essential that there is confidence that proper monitoring mechanisms and indicators are established at the outset and reviewed as necessary.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Version 3 Deadline 5 Response</b>  <a href="#">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.</a></p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data. The assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p> <p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>The draft Section 106 agreement sets out the mechanism for monitoring air quality (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) and the impacts from</p>	<p>Section 13.9 and Section 13.10 of ES <b>Chapter 13 Air Quality</b> <a href="#">[APP-038]</a></p> <p><a href="#">Schedule 1 and Appendix 5 of the Draft Section 106 Agreement [REP2-004]</a></p> <p><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant's Response to Deadline 4</a></p>	<p>Under discussion</p>

		<p><a href="#">It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p>the Proposed Development, to identify and manage any new exceedances of the National Air Quality Standards occurring as a result of airport activity.</p> <p>GAL has worked with Local Authorities over many years to fund air quality monitoring to understand air quality locally. As part of the Project, a commitment will be made in the draft Section 106 agreement to the continuation of current monitoring and additional monitoring at several proposed sites (Chapter 13 Figure 13.1.12).</p> <p><a href="#">Updated Position (April 2024): The Applicant has provided a Draft Air Quality Action Plan (AQAP) at Appendix 5 of the Draft Section 106 Agreement [REP2-004]. The document sets out measures and monitoring commitments related to air quality and odour management to be undertaken by GAL which are secured under the DCO or s106 Agreement. The Applicant looks forward to receiving MVDC's feedback on the draft AQAP.</a></p> <p><a href="#">Updated position (Deadline 5): The Applicant has provided a response to the air quality matter submitted by the JLAs at Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant's Response to Deadline 4 Submissions (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs' review submitted at Deadline 4 [REP4-053].</a></p>	<p><a href="#">Submissions (Doc Ref. 10.38)</a></p>	
<p><b>2.2.4.6</b></p>	<p>Air Quality</p>	<p>While it is acknowledged that the Applicant has committed to addressing impacts, monitoring and mitigation through s106 mechanisms, this is considered to be too late and needs to be understood more thoroughly upfront. The Applicant is yet to provide any type of construction-related management plan, including that which is r carried out effective ultra-fine particle assessments, which are relevant and a likely air quality impact to Mole Valley communities. Ultra-fine particles are not just likely to stem from aircraft, but also traffic and construction processes and the assessment and mitigation must be addressed where necessary.</p> <p><b>Updated position (Deadline 1):</b> It is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared.</p> <p>This is still requested and welcome the commitment to discuss further.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><a href="#">Version 3 Deadline 5 Response</a></p>	<p>ES Chapter 13: Air Quality has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. A robust assessment presenting reasonable worst case effects has been provided in line with best practice guidance and available data.</p> <p>An assessment of ultra-fine particulate matter (UFP) has been undertaken and is reported in the ES health and wellbeing chapter. That assessment considers the emerging scientific understanding of UFPs as a public health issue. The approach follows IEMA 2022 guidance on assessing human health effects in EIA.</p> <p>The air quality assessment concludes that the impact of the Proposed Development would not be significant. As such, taking into account embedded mitigation, no other mitigation is required as a result of the project.</p>	<p>Section 13.9 of <b>ES Chapter 13 Air Quality</b> <a href="#">[APP-038]</a></p> <p>Section 18.8 of <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a></p> <p>"Health and wellbeing effects from changes to air quality" paragraphs 18.8.67 to 18.8.86.</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a></p> <p><b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a></p>	<p>Under discussion</p>



		<p><a href="#">The Joint Local Authorities have submitted a detailed review of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review. 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.</a></p> <p><a href="#">Without a response from GAL to the DMP and AQAP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p>This notwithstanding, the assessment in Section 13.9 of ES Chapter 13: Air Quality sets out the proposed measures with the aim of reducing the airport contribution to local air quality regardless of significance.</p> <p>Measures that will be in place through the construction of the Project including mitigation and monitoring of dust are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO. Paragraph 2.2.7 of the CoCP sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP.</p> <p>The Carbon Action Plan sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access emissions are set out in the Surface Access Commitments.</p> <p>Measures and monitoring commitments will be secured via the DCO and updated draft Section 106 agreement. The commitments will provide suitable monitoring to allow for the local authorities to carry out their LAQM requirements.</p> <p>In addition to monitoring key pollutants GAL commits to participating in national aviation industry body studies of UFP emissions at airports including those reviewing how monitoring could be undertaken, as discussed in the Health and Wellbeing assessment.</p> <p><b>Updated position (Deadline 1):</b> A note explaining the draft Outline CDMP will be shared with CBC for comment by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.</p> <p><a href="#">Updated Position (April 2024): The Draft Construction Dust Management Plan (CDMP) has been shared with local authorities for comment on 26<sup>th</sup> March, considering the items set out by local authorities in the SoCG and Local Impact Reports. The Applicant looks forward to receiving the LAs comments in due course.</a></p> <p><a href="#">The Applicant has set out provisions in relation to UFPs at Schedule 1, Deadline 2 Submission – 10.11 Draft Section 106 Agreement [REP2-004].</a></p>	<p><b>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</b></p> <p><b>ES Appendix 5.3.2: Code of Construction Practice (REP1-021)</b></p> <p><b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b></p> <p><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</a></p>	
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			<p><b>Updated position (Deadline 5):</b> The Applicant has provided a response to the air quality matter submitted by the JLAs at <a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs’ review submitted at Deadline 4 [REP4-053].</p>		
2.2.4.7	Air Quality	<p>Ensuring management plans are shared and scrutinised, at least in draft, as well as a complaints policy and monitoring strategy is essential and needs to be resolved as part of ongoing discussions. Should the DCO be approved, in the absence of such management plans, implementation could fall short of what is necessary and appropriate.</p> <p><b>Updated position (Deadline 1):</b> It is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared.</p> <p>This is still requested and welcome the commitment to discuss further.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council’s comments and supporting mitigation tables within the Joint Surrey Council’s Local Impact Report.</p> <p><b>Version 3 Deadline 5 Response</b>  <a href="#">The Joint Local Authorities have submitted detailed reviews of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</a></p> <p><a href="#">Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</a></p>	<p>Measures that will be in place through the construction of the Project including recording dust and air quality complaints are detailed in Section 5.8 of the ES Appendix Construction Period Mitigation and are included in the Code of Construction Practice, to be secured under the requirements of the DCO.</p> <p>Paragraph 2.2.7 of the CoCP sets out that Construction Dust Management Plans (CDMP) will be prepared in accordance with the CoCP.</p> <p>Management plans will be prepared for specific areas of the Project to reflect any site-specific conditions or measures to mitigate dust impacts (set out in para 5.8.2 of the CoCP).</p> <p>The CDMPs will be prepared for approval by the relevant local planning authority prior to construction works commencing, as confirmed in paragraph 5.8.2 of the CoCP.</p> <p><b>Updated position (Deadline 1):</b> A note explaining the draft Outline CDMP will be shared with CBC for comment by 26<sup>th</sup> March (to align with Deadline 2), with the intention of submitting the note into the Examination in due course taking account of any feedback received.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Draft Construction Dust Management Plan (CDMP) has been shared with local authorities for comment on 26<sup>th</sup> March, considering the items set out by local authorities in the SoCG and Local Impact Reports. The Applicant looks forward to receiving the LAs comments in due course.</a></p> <p><b>Updated position (Deadline 5):</b> The Applicant has provided a response to the air quality matter submitted by the JLAs at <a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38). The Applicant will respond at Deadline 6 to the JLAs’ review submitted at Deadline 4 [REP4-053].</p>	<p><b>ES Appendix 13.8.1: Air Quality Construction Period Mitigation</b> [APP-161]</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> (REP1-021)</p> <p><a href="#">Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions</a> (Doc Ref. 10.38)</p>	Under discussion
<b>Other</b>					
There are no other issues relevant to this topic in this Statement of Common Ground.					



2.3. Capacity and Operations

2.3.1 Table 2.3 sets out the position of both parties in relation to capacity and operations matters.

**Table 2.3 Statement of Common Ground – Capacity and Operations Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>Please see the joint Statement of Common Ground prepared in relation to Capacity and Operations (Doc Ref. 10.1.18).</i>					



2.4. Climate Change

2.4.1 **Table 2.4** sets out the position of both parties in relation to climate change matters.

**Table 2.4 Statement of Common Ground – Climate Change Matters**

Reference	Issues Tracker Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Climate Change within this Statement of Common Ground.</i>						

2.5. Construction

2.5.1 Table 2.5 sets out the position of both parties in relation to construction matters.

**Table 2.5 Statement of Common Ground – Construction Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Construction within this Statement of Common Ground.</i>					

2.6. Cumulative Effects and Interrelationships

2.6.1 Table 2.6 sets out the position of both parties in relation to cumulative effects and interrelationships matters.

**Table 2.6 Statement of Common Ground – Cumulative Effects and Interrelationships Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Cumulative Effects and Interrelationships within this Statement of Common Ground.</i>					

2.7. Draft DCO and Explanatory Memorandum

2.7.1 Table 2.7 sets out the position of both parties in relation to Draft DCO and Explanatory Memorandum matters.

**Table 2.7 Statement of Common Ground – Draft DCO and Explanatory Memorandum Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to the Draft DCO and Explanatory Memorandum within this Statement of Common Ground.</i>					



2.8. Ecology and Nature Conservation

2.8.1 Table 2.8 sets out the position of both parties in relation to ecology and nature conservation matters.

**Table 2.8 Statement of Common Ground – Ecology and Nature Conservation Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
<b>Assessment Methodology</b>					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
<b>Assessment</b>					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
<b>Mitigation and Compensation</b>					
2.8.4.1	Biodiversity	<p>The Council welcomes the ambitious Biodiversity Net Gain (BNG) target (22.5%) set out within the examination documents. However, the Council would like to seek clarity on:</p> <ul style="list-style-type: none"> <li>long-term maintenance arrangements for Church Meadows;</li> <li>further information regarding on habitat trading and what options were considered and discounted when arriving at the conclusion that GAL would not be able to meet Habitat Trading standards; and</li> <li>information on the extent to which land beyond the NRP boundary was considered for improvements and biodiversity enrichment, as well as opportunities for better design through landscaping.</li> </ul> <p><b>Updated position (Deadline 1):</b> MVDC thanks GAL for confirming the non-statutory requirement for BNG in the NSIP process. The Council also thanks the clarity provided on the ‘trading’ element. However, for transparency, the Council questions whether BNG should be referred to if there is no statutory requirement as this could be considered misleading. Assurances are needed that ecology requirements will be met and impacts mitigated.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <u>The Council no longer wish to pursue this element and recognise that the achievement of biodiversity and ecology benefits can be achieved through various mechanisms. However, MVDC suggest that if BNG best practice guidelines are not followed, in is inappropriate to state the scheme is achieving BNG</u></p>	<p>We are pleased the Council welcomes the ambition to achieve a 22.5% BNG on the Northern Runway Project. As the Council may be aware, BNG is not yet mandatory for NSIPs and, as such, Gatwick does not have to fulfil the trading rules, although we have had regard for these in developing our proposals. The BNG trading deficit arises primarily because the NRP requires the removal of woodland along the A23 which cannot be fully replanted within the Project order limits because of aerodrome safeguarding concerns. Natural England have accepted in discussions with GAL the reasons why the trading rules haven’t been achievable. The extent of woodland that can be recreated has been maximised to ensure that the deficit is as small as possible (including through new woodland planting in the Longbridge Roundabout open space and Car Park B). Discussions were had with the Biodiversity Sub-Group with respect to options for off-site planting of woodland on third party land to address the remaining deficit but, to date, no group has engaged with GAL.</p> <p>With respect to the consideration of land outside the order limits, these have been drawn around the Project as a whole and include significant land out with the existing airport boundary at both Museum Field, Brook Farm and Longbridge Roundabout. Once these areas were incorporated into the Project for landscaping purposes, the order limits were drawn around them. The arrangement for the Open Space at Church Meadows is expressed in the Draft DCO:</p> <p>“Special category land 40.— (1) On the exercise by the undertaker of the Order rights, the special category land identified in Part 1 of Schedule 10 (special category land to be permanently acquired and for which replacement land is provided) is not to vest in the undertaker until the undertaker has</p>	Draft DCO (REP3-006)	<a href="#">No longer pursuing</a> <del>Under discussion</del>

			<p>acquired the replacement land (to the extent not already in its ownership) and an open space management plan has been submitted to, and approved in writing by, the relevant planning authority.</p> <p>(2) The open space management plan submitted under paragraph (1) must be in general accordance with the outline landscape and ecology management plan.</p> <p>(3) On the requirements of paragraph (1) being satisfied, the special category land identified in Part 1 of Schedule 10 is to vest in the undertaker (or any specified person) and be discharged from all rights, trusts and incidents to which it was previously subject.</p> <p>(4) The undertaker must implement the open space management plan approved by the relevant planning authority under paragraph (1) and on the date on which the replacement land is laid out and provided in accordance with that plan, the replacement land is to vest in the persons in whom the special category land specified in paragraph (1) was vested on the date of the exercise of the Order powers (if the replacement land is not already owned by those persons) and is to be subject to the same rights, trusts and incidents as attached to the special category land.”</p> <p>(5) In this article— “Order rights” means rights and powers exercisable over the special category land by the undertaker under article 27 (compulsory acquisition of land) and article 28 (compulsory acquisition of rights and imposition of restrictive covenants); “outline landscape and ecology management plan” means the document certified as such by the Secretary of State under article 51 (certification of documents, etc.); and “specified person” means a person other than the undertaker for whose benefit the replacement land or rights are being acquired.</p> <p><u><a href="#">Updated position (April 2024): Whilst there is no legal requirement for the Project to deliver BNG, the design has been developed such that the extent of net gain possible has been maximised within the parameters of the Project and the safeguarding requirements associated with an operational airport. The term is used by the majority of stakeholders to refer to the process of assessing the ecological enhancement a project delivers; as such, it is used within the Project to ensure all parties understand what is meant. With respect to the ecological outcomes of the Project, these are secured via their inclusion in the Code of Construction Practice (CoCP) [REP1-021], secured by Requirement 7 of the Draft DCO, and Appendix 8.8.1: Outline Landscape and Ecology Management Plan [REP2-021 ,REP2-023, REP2-025, REP2-027] secured by Requirement 8 of the Draft DCO.</a></u></p>		
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			<p><a href="#">In addition, the measures which contribute to the conclusions in ES Appendix 9.9.2: Biodiversity Net Gain Statement [REP3-047] are secured via the incorporation of the relevant measures into the oLEMP such that they are reflected in Landscape and Ecology Management Plans submitted pursuant to Requirement 8 of the dDCO (Doc Ref. 2.1 v6) by virtue of the requirement that such plans must be substantially in accordance with the oLEMP.</a></p> <p><a href="#">An amended version of the oLEMP has been submitted at Deadline 3 (Doc Ref. 5.3 v3) that explicitly incorporates details of the measures relied upon in Section 8</a></p>		
<a href="#">NEW: 2.8.4.2</a>	<a href="#">Biodiversity</a>	<p><a href="#">A commitment to continued support for the Gatwick Greenspace Partnership is set out in the Planning Statement (APP-245). Information regarding the fund is included within the Applicant's submitted draft S106 Schedule 6, Section 2 [REP2-004].</a></p> <p><a href="#">As stated in the Council's comments on the Applicants Response to ExAQ1 E10 [REP4-074], MVDC does not consider the Gatwick Greenspace Partnership (GGP) to be an effective funding mechanism in all cases.</a></p> <p><a href="#">The GGP is paid to Sussex Wildlife Trust and its relevance to Surrey and its work within Surrey County is unclear. The Council accepts that the GGP is part of the ongoing discussions as part of the S106, but it is considered prudent that such discussions regarding any continuance of the GGP should be informed by clarification as to which authorities have benefitted from the fund previously and in what way. This will enable more meaningful discussion so that it can be established whether the GGP should be perpetuated wholesale, or updated to form a more modern and effective fund that is only applicable to those that gain from it.</a></p> <p><a href="#">The Council requests that the Applicant provide information of the GGP funding and usage to further conversations.</a></p>			<a href="#">Under discussion</a>
<b>Other</b>					
<i>There are no other issues relevant to this topic within this Statement of Common Ground.</i>					

2.9. Forecasting and Need

2.9.1 **Table 2.9** sets out the position of both parties in relation to forecasting and need matters.

**Table 2.9 Statement of Common Ground – Forecasting and Need Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>Please see the joint Statement of Common Ground prepared in relation to Forecasting and Need (Doc Ref. 10.1.198).</i>					

2.10. Geology and Ground Conditions

2.10.1 Table 2.10 sets out the position of both parties in relation to geology and ground conditions matters.

**Table 2.10 Statement of Common Ground – Geology and Ground Conditions Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Geology and Ground Conditions within this Statement of Common Ground.</i>					

2.11. Greenhouse Gases

2.11.1 Table 2.11 sets out the position of both parties in relation to greenhouse gases matters.

Table 2.11 Statement of Common Ground – Greenhouse Gases Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
2.11.1.1	Climate Change and Greenhouse Gas Emissions	Furthermore, the Council remains unconvinced that the baseline position and approach to considering climate/carbon impacts is robust when considered against both the Jet Zero publication and the national targets for zero carbon. There is some sympathy for the Applicant in that the Government has not always been clear on potential conflicts between the two matters but the Council considers that the Applicant has not gone far enough in its assessments to give confidence that the climate impacts of the NRP will be as are depicted, or accord with the government agenda.	It is unclear what the specific deficiency is that the comment relates to. The assessment process has sought to follow appropriate guidance.	n/a	No longer pursuing.
<b>Assessment Methodology</b>					
2.11.2.1	Over reliance on possible future technologies and lack of regard for cumulative impacts from other airspace/port changes Document Ref(s): APP-041, APP-045, APP-194	<p>The Council does not consider the scenario testing for emissions robust or realistic as there is: 1) A clear reliance on new technologies and supposed improvements in aviation when modelling emissions. Yet, there are no guarantees that these technologies will materialise or that the airlines with the ability to use them will operate out of Gatwick. 2) Insufficient regard to the possible impacts of wider London airport expansion plans and airspace change programmes. Both elements will cumulatively impact emissions and the approach taken by GAL is too singular and presents the best case scenario and not what will actually happen in reality.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant's assessment has been undertaken with consideration to the Jet Zero high ambition trajectory and that this trajectory is representative of government's current 'budget' for aviation to contribute to net zero.</p> <p>Sensitivity testing is for the purpose of what the impacts of the NRP would be, should future technologies not come forward as intended. The Council seeks reassurances on how this will be monitored and responded to, should policy not be as successful as the government hope.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction.</p>	<p>The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4.</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p> <p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant. This is noted in ES Paragraph 16.10.4 that references the IEMA Guidance noting that "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'."</p> <p><b>Updated position (April 2024)</b></p>	<p><b>ES Chapter 16 Greenhouse Gases [APP-041]</b></p> <p><b>ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194]</b></p>	<p><del>Under discussion</del> <b>Not agreed</b></p>



		<p><a href="#">Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, sensitivity testing should take place and a process of growth management should be in place should future technologies not come forward as intended.</a></p> <p><a href="#">The Applicant should conduct an analysis to determine if the proportion of the Jet Zero budget allocated for its project is appropriate when considering all current and future airport expansion projects across the UK.</a></p>	<p><a href="#">The UK Government has acknowledged the uncertainties around the rate of development of different technologies that will help to mitigate aviation emissions in the UK. It has also committed to maintaining a sector view on the rate of progress should some of those technologies not come forward at the rate set out in the Jet Zero scenario, and has committed to take further action should this risk the UK aviation sector emissions not reducing at the required rate.</a></p>		
2.11.2.2	Climate Change and Greenhouse Gas Emissions	<p>The Council has been unable to determine if the full suite of emission generating-building works and longer-term upkeep and replacement has been accounted for within the presented emission forecasts. This should include the emissions which will be generated by all proposed buildings (including new hotels and offices) not just those relating to the immediate airport and passenger terminals etc. The Applicant needs to clarify this matter to provide assurances that calculations are not capturing only half of the story. If full audit has not been made, then work should be carried out or a clear justification provided.</p> <p><b>Updated position (Deadline 1):</b> It is agreed that emission sources from developments outside of the scope of GAL's boundary are not to be considered as it's not possible to predict.</p> <p>However, GAL should recognise the potential impact of emissions stemming from airport operations, at least qualitatively, for transparency. This acknowledgement aligns with one of the key principles of GHG accounting.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b></p> <p><a href="#">In Deadline 4, the Applicant has submitted updated calculations estimating emissions from maintenance, repair, replacement, and refurbishment activities. These emissions account for approximately 2.12% of the total emissions. The Applicant demonstrates that these emissions fall below the IEMA threshold, and therefore, they are not required to be included in the total whole-life carbon assessment.</a></p>	<p>The assessment considers the construction and emissions arising from buildings and infrastructure as set out in the Project Description. The assessment does not seek to assess impacts from potential future development that might arise indirectly from the presence of the existing airport, or the airport under the NRP, that is not yet consented. It is not considered reasonable to expect the assessment to consider all potential economic development that might be associated in some way with the airport where no proposals currently exist.</p> <p><b>Updated position (April 2024)</b></p> <p><a href="#">It is not clear what emissions are being referred to. The assessment documentation makes clear which emissions fall within the scope and boundary of the GHG assessment, and what guidance has been followed in order to establish this scope and boundary.</a></p>	ES Chapter 5 Project Description [APP-030]	<del>Under discussion</del> Agreed
2.11.2.3	Climate Change and Greenhouse Gas Emissions	<p>Regarding carbon calculations, the Council appreciates that the national position and research regarding climate change and greenhouse gases is a moving feast. However, for the benefit of robustness, the examination should require an update on cumulative</p>	<p>The PAS 2080 is a specification that sets out how effective carbon management can take place for infrastructure and buildings projects – it does not provide guidance on how the impact of a project should</p>	n/a	No longer pursuing

		<p>effects regarding climate implications when considered against the newest PAS 2080 standards (April 2023). This information was available prior to submission and regard should have been had. Other more recent standards and publications may also be relevant to any update.</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged in the CAP (Appendix 5.4.2: Carbon Action Plan) that the Applicant will only use Principal Contractors who are PAS 2080: 2023 Carbon management in infrastructure and buildings (as amended) certified.</p>	<p>be assessed, nor does it provide guidance on how a cumulative assessment of impact should take place.</p> <p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant. This is noted in ES Paragraph 16.10.4 that references the IEMA Guidance noting that “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’.”</p>		
<p>2.11.2.4</p>	<p>Climate Change and Greenhouse Gas Emissions</p>	<p>The NRP places great weight on new technologies and fuel types as the basis to justify its case in terms of emission and environmental impacts. Yet, there are no guarantees that these technologies will materialise, or that the airlines with the ability to use them will operate out of Gatwick. In addition, there is insufficient regard to the cumulative impacts of wider London airport expansion plans and airspace change programmes, all of which will contribute to emissions. As such, the approach taken by the Applicant, as presented, is too singular and presents the best-case scenario. Scenarios should be based on a 'full-spread' of possible emissions and impacts rather than a 'hope for the best' approach. Updated cumulative assessments are needed to factor in the necessary scenarios (Appendix 5.1).</p> <p><b>Updated position (Deadline 1):</b> It is acknowledged that the Applicant's assessment has been undertaken with consideration to the Jet Zero high ambition trajectory and that this trajectory is representative of government's current 'budget' for aviation to contribute to net zero.</p> <p>Sensitivity testing is for the purpose of what the impacts of the NRP would be, should future technologies not come forward as intended. The Council seeks reassurances on how this will be monitored and responded to, should policy not be as successful as the government hope.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction.</p>	<p>The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194].</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p> <p>It is considered within the assessment that Jet Zero, and the underlying modelling carried out by UK Government as part of this, provides a more comprehensive cumulative assessment of aviation emissions than could be carried out by the Applicant. This is noted in ES Paragraph 16.10.4 that references the IEMA Guidance noting that “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’.”</p> <p><b>Updated position (April 2024)</b> Please refer to the response at Row 2.11.2.1.</p>	<p><b>ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194]</b></p> <p><b>ES Chapter 16 Greenhouse Gases [APP-041]</b></p>	<p>Under discussion Not agreed</p>

		<p><a href="#">Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, sensitivity testing should take place and a process of growth management should be in place should future technologies not come forward as intended.</a></p> <p><a href="#">The Applicant should conduct an analysis to determine if the proportion of the Jet Zero budget allocated for its project is appropriate when considering all current and future airport expansion projects across the UK.</a></p>			
<b>Assessment</b>					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
<b>Mitigation and Compensation</b>					
2.11.4.1	A more innovative and committed strategy to reducing emissions is needed Document Ref(s): APP-091	<p>Appendix 5.4.2: Carbon Action Plan does not show sufficient commitment or provide an innovative solution to carbon emissions. Carbon offsetting should be a 'last resort' approach to managing emissions. The Council does not consider that the Applicant has gone far enough in seeking to reduce emissions. Coupled with a reliance on new, but uncertain technologies, it is likely that a greater reliance on less beneficial offsetting would be required.</p> <p><b>Updated position (Deadline 1):</b> As per the Streamlined Energy and Carbon Reporting (SECR) process, the Applicant's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for Renewable Electricity Guarantees of Origin (REGO). This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.</p> <p>The Council consider that the Applicant should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">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</a></p>	<p>The Carbon Action Plan commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. It is entirely appropriate within this framework to consider the use of a range of market mechanisms at such stages are as appropriate - and this includes the use of REGOs as part of this. The Carbon Action Plan notes GAL's commitments to use 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.</p> <p><b>Updated position (April 2024)</b>  <a href="#">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).</a></p> <p><a href="#">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. 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</a></p>	<p><b>ES Appendix 5.4.2: Carbon Action Plan</b>  <a href="#">[APP-091]</a></p>	Under discussion

		<p><u>operations and surface access transportation. Emission limits and thresholds for pertinent project stages should be established.</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.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b>It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction.</u></p> <p><u>Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, it is the Council's view that a process of growth management should be in place, to ensure growth matches environmental impacts and can be offset accordingly.</u></p>	<p><u>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.</u></p>		
<b>2.11.4.2</b>	Climate Change and Greenhouse Gas Emissions	<p>The Applicant has placed too much emphasis on the option of offsetting carbon emissions as opposed to seeking ways to mitigate them on-site. The Carbon Action Plan (Appendix 5.4.2) is unduly light on the commitment to consider and deliver innovative and reasonable solutions. Offsetting should be a 'last resort' mechanism yet, as read, it appears to be considered as the main solution. With such a large-scale project, it is considered that the Applicant has not taken advantage of opportunities to be a pioneer for innovative climate limiting development within the built and natural form of the application area and beyond. This could include design, operations and a wider introduction of sustainable technologies for static structures.</p> <p><b>Updated position (Deadline 1):</b> As per the Streamlined Energy and Carbon Reporting (SECR) process, the Applicant's reporting should clearly delineate the distinction between market-based emission factor reporting and localised values for Renewable Electricity Guarantees of Origin (REGO). This clarity is essential to identify the extent of potential residual emissions stemming from electrical energy use.</p> <p>The Council consider that the Applicant should offer clarity regarding the offset schemes it intends to employ, enabling the verification of their credibility.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> This aspect is no longer being pursued in isolation and the Council is of the opinion that wider</p>	<p>The Carbon Action Plan commits Gatwick to a transition through carbon neutrality and towards Net Zero, and Absolute Zero, over time. It is entirely appropriate within this framework to consider the use of a range of market mechanisms at such stages are as appropriate - and this includes the use of REGOs as part of this. The Carbon Action Plan notes GAL's commitments to use 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.</p> <p><b>Updated position (April 2024)</b>  <u>The assessment incorporates a range of different emissions sources, some of which are not addressed within SECR, which is intended for use as a corporate reporting methodology. GAL already provides reporting in line with its SECR requirements within its corporate Annual Report.</u></p>	<b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a>	<del>Under discussion</del> <del>No longer pursued.</del>



		<a href="#">monitoring discussions for emissions and climate impacts will deal with the matter more comprehensively.</a>			
<a href="#">2.11.4.3</a>	<a href="#">MV42- Decarbonise surface transport emissions</a>	<p><a href="#">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 such as the expansion of the network of hydrogen buses used in the Gatwick/Crawley area into Mid Sussex with accompanying infrastructure.</a></p> <p><a href="#">Updated Position (Deadline 5 - May 2024):</a>Surface Access matters remain under discussion as part of the wider examination and with the highway's authorities.</p> <p><a href="#">The Applicant has demonstrated in Deadline 3 that it is committed to providing charging infrastructure for electric vehicles used to access the Airport (both passenger and staff) to facilitate the use of ultra-low and zero emission vehicles for those journeys that are made by car. The Applicant is also committed to investing £1m to Metrobus in hydrogen buses for the local network.</a></p>	<p><a href="#">The Transport Assessment [AS-079] and the Surface Access Commitments (SAC) [APP-090] set out how the Applicant's commitments to sustainable travel are binding under the DCO.</a></p> <p><a href="#">An updated version of ES Appendix 5.4.1: Surface Access Commitments [REP3-028] has been submitted at Deadline 3 which adds further detail to Commitment 12. Under Commitment 12A GAL shall produce a strategy for providing charging infrastructure for electric vehicles used to access the Airport (both passenger and staff) to facilitate the use of ultra-low and zero emission vehicles for those journeys that are made by car.</a></p> <p><a href="#">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.</a></p> <p><a href="#">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.</a></p> <p><a href="#">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</a></p>	<p><a href="#">Transport Assessment [AS-079]</a></p> <p><a href="#">Surface Access Commitments – Version 2 [REP3-029]</a></p>	<a href="#">Agreed</a>
<a href="#">2.11.4.4</a>	<a href="#">GAL does not identify the risks associated with using carbon offset schemes.</a>	<p><a href="#">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.</a></p> <p><a href="#">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. In addition, and where reasonably</a></p>	<p><a href="#">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).</a></p> <p><a href="#">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.</a></p>		<a href="#">Agreed</a>

		<p><u>practical, GAL should seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b><u>The Council welcomes the update that the Applicant it is looking into the development of a local carbon removal project and has nothing further to add on this matter and recognises climate change matters are being addressed more widely as part of the examination.</u></p>	<p><u>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</u></p> <p><u>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></u></p> <p><u>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.</u></p> <p><u>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.</u></p>		
<p><b>Other</b></p> <p><i>There are no other issues relating to this topic within this Statement of Common Ground.</i></p>					



2.12. Health and Wellbeing

2.12.1 Table 2.12 sets out the position of both parties in relation to health and wellbeing matters.

**Table 2.12 Statement of Common Ground – Health and Wellbeing Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Health and Wellbeing within this Statement of Common Ground.</i>					

2.13. Historic Environment

2.13.1 Table 2.13 sets out the position of both parties in relation to historic environment matters.

**Table 2.13 Statement of Common Ground – Historic Environment Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
<b>Assessment Methodology</b>					
2.13.2.1	Heritage	<p>The Applicant argues (APP-032) that it has used a Historic England-commissioned report on how to assess the impact of a change in operational aircraft noise on the setting of heritage assets to undertake its assessments. This uses a noise contour area based on the change in noise from aircraft resulting from the proposed expansion. Within the area where the noise change is above a certain threshold (+1dB Leq16 and +25% N60), the heritage assets are further filtered based on four 'sensitivity' categories A-D.</p> <p><b>Updated position (Deadline 1):</b> The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.</p>	<p>The report commissioned by English Heritage (now Historic England) and published in 2014 is titled Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England, usually shortened to Aviation Noise Metric and sometimes as known as the Temple methodology.</p> <p>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.</p> <p>This use of the Aviation Noise Metric has been discussed at length with Historic England, who have advised in their Section 56 Consultation Response that the methodology set out in the guidance document has been used correctly.</p> <p>It should be noted that the noise change contours established for the assessment are based on the predicted changes to the average summer daytime noise level (Leq 16 hr). The +25 daytime N60 contour was not used in this process. This is set out in section 5.4 of ES Appendix 7.6.1.</p>	<b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a>	No longer pursuing
2.13.2.2	Heritage	<p>There are many other listed buildings that fall within the wider envelope that have not been recognised but whose setting would be impacted by the increase in the number of flights. MVDC has previously raised concerns through the pre-application process and observed that buildings had been screened out unnecessarily and were assured the methodology would be looked at. This has not been done and Consultation Report Annex A (APP-219) confirms that no changes have been made as result of comments.</p> <p><b>Updated position (Deadline 1):</b> The Relevant Representation submitted by Historic England do not support the Council's concerns and appear satisfied with the Applicant's approach. As such that the Council are no longer pursuing this issue.</p>	<p>The four categories of noise-sensitive heritage assets (Categories A-D) were reviewed in order to see if any other designated heritage assets within the noise change contours could fall into one or more of these four categories. This included consideration of listed farmhouses and former farmhouses. The outcome of this review was that no other designated heritage assets within the noise change contours could fall into one or more of these four categories.</p>	n/a	No longer pursuing

2.13.2.3	Heritage	<p>The Council does not agree with the Applicant’s interpretation of Historic England’s methodology and considers that it should consider the 90 or so heritage assets within Mole Valley district under sensitivity Category D. The Applicant must verify and provide evidence which demonstrates whether Historic England approves of the approach taken and the interpretation of its methodology or seek to carry out the additional heritage assessment works to be robust and transparent.</p> <p><b>Updated position (Deadline 1):</b> The Relevant Representation submitted by Historic England do not support the Council’s concerns and appear satisfied with the Applicant’s approach. As such that the Council are no longer pursuing this issue.</p>	<p>Within the <i>Aviation Noise Metric</i>, Category D noise-sensitive heritage assets are defined as those where ‘<i>The absence of ‘foreign (modern) sounds’ allow an asset to be experienced at ‘a very specific point in time’ that is intrinsic to understanding the heritage asset’s significance’</i>. The applicant does not consider any designated heritage asset within Mole Valley District and within the defined noise change contour to fall within this definition.</p> <p>The Section 56 Consultation Response from Historic England states:</p> <p><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 heritage 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. The three most affected noise-sensitive heritage assets – viz. The Grade II listed Church of St John the Baptist, Capel (NHLE 1378150); the Grade II listed Quaker Meeting House with attached cottage at Capel (NHLE 1028737); and the relocated Grade II listed Lowfield Heath Windmill, Charlwood (NHLE 1298883) - would not experience a worsened aircraft noise impact based upon this assessment. This would also be the case in regard to the Grade II* listed Church of St Michael and All Angels at Lowfield Heath (NHLE 1187081). On the basis of this assessment we are content that no permanent significant harmful impacts to high-graded designated heritage assets from increased aircraft noise would result from the scheme proposals.’</i></p>	n/a	No longer pursuing
<b>Assessment</b>					
2.13.3.1	Heritage	<p>Within Mole Valley, out of the 90 or so heritage assets within the noise change contour area, only three heritage assets have been highlighted as sensitive to change – two places of worship (Category A) and a windmill (Category B). It is not clear why the increase in noise and visual movement would not be considered to have a greater significant impact on the historic environment of this area.</p> <p><b>Updated position (Deadline 1):</b> The Relevant Representation submitted by Historic England do not support the Council’s concerns and appear satisfied with the Applicant’s approach. As such that the Council are no longer pursuing this issue.</p>	<p>The Aviation Noise Metric identifies four categories of noise-sensitive heritage assets (Categories A-D).</p> <p>The assessment found that three designated heritage assets with Mole Valley could be identified as being within one of the four categories of noise-sensitive heritage assets as defined within the <i>Aviation Noise Metric</i>.</p> <p>Detailed assessment was then undertaken regarding the predicted noise change at each of these three designated assets, using noise measurements at each location. In all cases the overall significance of effect was assessed as no change. This was due to the predicted air noise with the Project in place actually being slightly less than at present. This is set out in</p>	<b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a>	No longer pursuing

			paragraphs 7.9.117- 7.9.122 of ES Chapter 7: Historic Environment.		
<b>Mitigation and Compensation</b>					
<i>There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.</i>					
<b>Other</b>					
<i>There are no other issues relating to this topic within this Statement of Common Ground.</i>					

2.14. Landscape, Townscape and Visual

2.14.1 Table 2.14 sets out the position of both parties in relation to landscape, townscape and visual matters.

**Table 2.14 Statement of Common Ground – Landscape, Townscape and Visual Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
<b>Assessment Methodology</b>					
2.14.2.1	Landscape and the Area of Outstanding Natural Beauty (AONB)	<p>It remains unclear whether the Surrey Hills AONB has been suitably considered through the Landscape, Townscape, and Visual Impact Assessment (LTVIA) (APP-033) in terms of the tranquillity assessment. While it is acknowledged that Natural England’s review of the Surrey Hills boundary is ongoing, draft amendments are available to the Applicant and have been since March 2023. The Applicant has had sufficient information and time prior to submission to consider this and the Council does not consider there to have been due regard to these changes or the potential impacts.</p> <p><b>Updated position (Deadline 1):</b> Assurances of how the Applicant will address this are needed.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> The Council’s view on this matter has been submitted to the ExA at Deadline 4 (REP4-074) in reply to the Applicant’s response to ExAQ1 LV.1.8. and is partially replicated below for context:</p> <p><u>“It is the Council’s understanding that no regard to the Natural England’s review of the Surrey Hills National Landscape (SHNL) boundaries has been had within the Environmental Statement and this is confirmed at Paragraph 2.14 of the Deadline 1 iteration of the draft Statement of Common Ground with MVDC (REP1-043).</u></p> <p><u>The Consultation on NE’s proposed extensions to the SHNL were published for consultation for 14 weeks between 7 March 2023 – 13 June 2023. While it is accepted that the information regarding the Mole Valley proposed extension will not have been available to the Applicant at that time, NE’s proposals for an amended boundary were available from early March, some 4 months, prior to the NRP submission.</u></p> <p><u>Furthermore, regarding the Council’s proposed extension to the boundary extending down to Okewood Hill, (REP1 -097) it is unclear why views from Bletchingley and Reigate Park (Priory Park) are mentioned within the Applicant’s response which are some 13miles and 11miles (as the crow flies) respectively, to the northeast of Ockley, on the other side of the</u></p>	<p>Following contact with the Surrey Hills AONB unit regarding the progress of the boundary review process they confirmed that the evidence gathering in 2022 was complete and Natural England consultants are considering evaluation areas and Candidate Areas. Public consultation on the proposed extensions is ongoing in 2023.</p> <p>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 AONB is not included in the ES.</p> <p><b>Updated Position (April 2024):</b></p> <p><u>The Applicant has responded to the ExA’s question on whether the Project has taken account of the proposed extension to Surrey Hills National Landscape in ExQ1 LV.1.8 submitted at Deadline 3, in that it states:</u></p> <p><u>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 (SHNL) 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 [APP-033]</b> includes an assessment of effects on landscape character and special qualities of the Surrey Hills National Landscape, 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 ES Chapter 8 Figures 8.4.2, 8.4.3, 8.6.3 to 8.6.7 and 8.9.1 to 8.9. 128 [REP2-006, REP2-007, REP2-008]. If the identified new areas are designated, they would significantly increase the area of the Surrey Hills National Landscape. The ZTV within <b>ES Chapter 8 Figure 8.4.3 [REP2-006]</b> indicates that small, scattered areas on the tops of ridges and hills on the south side of the existing National Landscape would potentially form</u></p>	<p>n/a</p> <p><a href="#">ES Chapter 8 Figures [REP2-006, REP2-007, REP2-008]</a>.</p>	Under discussion

[airport. As such, there are no visual images pertaining to the area referenced in the Joint Surrey Council’s Local Impact Report \(REP1-097\), and some of the proposed extension would fall within the 10km Zone of Theoretical Visibility \(ZTV\) \(APP-033\), which has already been set by the Applicant.”](#)

[The Council is still seeking an understanding of how it has or will account for the potential area of expansion within the SHNL.](#)

[vantage points for distant views of Gatwick and the NRP.](#)

[Field surveys have been conducted within the proposed areas of National Landscape extension at several locations within the ZTV to test the potential for visibility. Panoramic photography has been undertaken to inform the assessment \(See Figures D3 1, 2 and 3 in Appendix B\). Two photos have been captured in Extension Area 10 near Bletchingley \(approximately 9km from the Project\) and one photo has been captured at Extension Area 11 at Reigate Park \(approximately 7km from the Project\). Intervening landform and vegetation obscures existing development at Gatwick from most locations visited within the SHNL Extension Areas. The photo at VP33 near Bletchingley shows that distant views of the taller buildings and infrastructure at Gatwick are visible within the context of other development at Crawley and Horley and the M25 motorway in the mid-distance. Any increase in the built form or aircraft movements at Gatwick as a result of the Project would be imperceptible at this distance. At night new light sources would be visible in the well lit context of the airport, Horley and Crawley. Effects on visual receptors of high sensitivity would be of negligible magnitude, resulting in no more than negligible adverse effects, which is not significant. Any boundary change would result in a larger area of nationally designated landscape that is overflowed by aircraft however, the overall conclusions within ES Chapter 8 regarding the level of effect on the perception of tranquillity within the Surrey Hills NL would not change. ES Figures 8.6.3 to 8.6.7 \[REP2-007\] 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.](#)

**Assessment**

*There are no issues relating to the assessment for this topic within this Statement of Common Ground.*

**Mitigation and Compensation**

*There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.*

**Other**

*There are no other issues relating to this topic within this Statement of Common Ground.*



2.15. Major Accidents and Disasters

2.15.1 Table 2.15 sets out the position of both parties in relation to major accidents and disasters matters.

**Table 2.15 Statement of Common Ground – Major Accidents and Disasters Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Major Accidents and Disasters within this Statement of Common Ground.</i>					

2.16. Noise and Vibration

2.16.1 Table 2.16 sets out the position of both parties in relation to noise and vibration matters.

Table 2.16 Statement of Common Ground – Noise and Vibration Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
2.16.1.1	For engine ground running activities, the L <sub>Amax</sub> assessment does not adequately cover all sensitive receptor locations Document Ref(s): APP-173, APP-176	<p>The assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB L<sub>Amax</sub> predictions by identifying car pass-by L<sub>Amax</sub> levels of 80dB. However, there is no attempt to contextualise L<sub>Amax</sub> engine ground running noise at any other receptor location.</p> <p><b>Updated position (Deadline 1):</b> It is welcomed that GAL propose to provide further information. This matter remains under discussion.</p> <p>In addition the applicant should refer to comments in the LIR and supporting mitigation tables.</p> <p><b>Updated Position (Deadline 3):</b> The Applicant is referred to the Joint Surrey Council’s Local Impact Report for more detailed information.</p> <p><b>Updated position (Deadline 5):</b> The logic that aircraft taxiing noise L<sub>Amax</sub> noise levels are high so ground running noise L<sub>Amax</sub> noise levels are not significant is inherently flawed.</p>	<p>A technical note will be provided to the TWG providing further details of engine ground running noise levels and frequencies of occurrence at other receptor locations which demonstrates the Project will not give rise significant effects from engine ground running.</p> <p><b>Updated Position (April 2024):</b> The Applicant has provided further details of ground noise sources modelled and a calculation showing the contribution of engine ground running to Leq noise levels is insignificant in <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix E - Ground Noise Engine Ground Runs [REP3-071]</b>. This report also provides a contextualisation of L<sub>max</sub> levels at other noise sensitive receptors to illustrate how ground noise will be experienced.</p>	<p><a href="#">Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix E - Ground Noise Engine Ground Runs [REP3-071]</a> <sup>a/a</sup></p>	Not Agreed
<b>Assessment methodology</b>					
2.16.2.1	2032 assessment year is assessed as a worst case scenario, but there should be a yearly breakdown Document Ref(s): APP-172, APP-180	<p>The assessment of air noise utilises 2032 which is identified as the worst-case in noise terms when compared to the base case of 2019 (Environmental Statement Appendix 14.9.2). However, identification of significant effects for all assessment years should be provided. The absence of this does not present a transparent account and is misleading. Identification of all years also enables a proper consideration of the level of mitigation that should be carried out and enable consistent monitoring.</p> <p><b>Updated position (Deadline 1):</b> The quantification in tables 4.1.1 to 4.1.36 is considered insufficiently specific to help the applicant inform their mitigation strategies.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council’s comments and supporting mitigation tables within the Joint Surrey Council’s Local Impact Report.</p>	<p>GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios modelled and reported in the ES. For air noise these comprise:</p> <ul style="list-style-type: none"> <li>• 8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, L<sub>max</sub> and overflights;</li> <li>• 5 assessment years – 2019, 2029, 2032, 2038 and 2047</li> <li>• 2 Fleet transition scenarios, the Central Case and Slower Transition Case.</li> </ul> <p>These are presented in 71 figures in the ES relating to air noise impacts with the data tabulated in ES Appendix 14.9.2. LPAs have been given access to an air noise web viewer to download air noise contours. This is considered a suitable set of noise modelling scenarios to allow the ES as written to describe the likely significant effects of the Project.</p>	<p><b>ES Chapter 14: Noise and Vibration [APP-039]</b></p> <p><b>ES Appendix 14.9.2 Air Noise Modelling [APP-172]</b></p> <p><a href="#">Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix B - Ground Noise Fleet Assessment [REP3-071]</a></p>	Not Agreed

		<p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>	<p>Populations affected are provided for all 4 assessment years. The extent of air noise impacts for the first full year of operation is discussed in paragraphs 14.9.71 to 14.9.72 and for the Design Year 2038 in paragraphs 14.9.258 to 14.9.260 explaining why the impacts in these periods will be lower than in 2032. Mitigation addresses the worst case impacts expected in 2032. N60 contour areas and populations are provided for all years in Appendix 14.9.2.</p> <p><b>Updated Position (April 2024):</b>  <a href="#">ES Table 14.9.9 illustrates the extent of impacts for each assessment year in terms of populations with increased noise levels, showing how these increase from opening in 2029 to 2032.</a>  <a href="#">Air noise mitigation measures including no use of the Northern Runway at night from 2300 to 0600 will apply from opening, as will other operational measures. The Noise Insulation Scheme will be activated during construction of the Project as described in 5.3 ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032].</a> Further details of properties qualifying for noise insulation due to ground noise and how this will be provided before the predicted noise impacts arise is given in <a href="#">Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix B - Ground Noise Fleet Assessment [REP3-071]</a>. The Noise Insulation Scheme will be updated and resubmitted to the Examining Authority incorporating these additions at Deadline 4, 15 May 2024.</p> <p><a href="#">The Applicant has considered the speed at which the scheme can be rolled out. In 2015 a single contractor delivered the current scheme to 418 homes, so the Applicant is confident the new scheme can be delivered, if necessary using multiple contractors, to ensure it is provided before the significant effects predicted in the ES arise.</a></p>		
<p>2.16.2.2</p>	<p>Overheating</p> <p>Document Ref(s): APP-180</p>	<p>There is no adequate assessment of overheating and the necessary performance of ventilation to ensure a comfortable internal environment. Local authorities have requested an 'Overheating Assessment' to demonstrate adequacy of the ventilation scheme. This has not been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications.</p> <p><b>Updated position (Deadline 1):</b> Overheating is not addressed by acoustic ventilators, which only introduce fresh air and do not have any cooling capability.</p>	<p>Overheating has been addressed by the provision of acoustic ventilators to all rooms with acoustic insulation. Further details have been developed on the specification of these ventilators and this will be provided in the technical note on implementation of the scheme and shared with the TWG.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Applicant has provided further details of the provision of noise insulation including the specification of acoustic ventilators to reduce overheating in 5.3 ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032].</a></p>		<p>Not Agreed</p>

		<p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has not addressed the matter of overheating other than to offer blinds to windows exposed to direct sunlight (paragraph 4.2.4 [REP4-017]), which MVDC deem as not sufficient. There should be the option of an overheating solution as part of the insulation package.</a></p>			
<b>2.16.2.3</b>	Eligibility for air Noise Insulation Scheme (NIS) Document Ref(s): APP-180	<p>The scheme assesses noise impacts based on average summer LAeq contour levels and the Council considers that this does not meet policy requirements and does not sufficiently protect against health impacts.</p> <p><b>Updated position (Deadline 1):</b> There are specific and significant local impacts that are not suitably mitigated by the current proposals.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>	<p>This issue has been responded to previously at Rows 13.4 and 13.100 of Table 13 in Appendix 1. The noise insulation scheme currently proposed for the Luton Airport Expansion Project DCO application (TR0200001) is based in average mode Leq day and night contours not single mode as suggested.</p> <p><b>Updated Position (April 2024):</b>  <a href="#">Leq 16 hr and Leq 8 hour are defined as average modal split by DfT when defining LOAEL. This is because long term noise effects such as annoyance and sleep disturbance are not determined by either noise levels on westerly operating days or by noise levels on easterly operating days, but by the combination of both as experienced in the relevant proportions over the long term. CAP 1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition, July 2021 concludes: that "Practically, this means that single-mode contours are unsuitable for decision making, but that they may be helpful for portraying exposure and changes to exposure. Of the average-day modes, the existing 92-day summer average mode was found to correlate better than shorter average modes. There was therefore no evidence found to support a change from the current practice of basing LAeq,16h on an average summer day."</a></p> <p><a href="#">The Government has been consulting on noise insulation schemes as part of its future aviation policy. In its consultation Aviation 2050 – the future of UK aviation (December 2018) it proposed a number of measures including: a) extending the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr. This is the average mode Leq 16 hr not single mode. The proposed scheme follows government guidance, in terms of the metric with which to define a noise insulation scheme, and in</a></p>	n/a	Not Agreed

			<p><a href="#">addition offers it at lower noise levels. The consultation also referred to considering ventilation and the proposed scheme includes acoustic ventilators.</a></p> <p><a href="#">The proposed noise insulation scheme complies with policy requirements.</a></p>		
2.16.2.4	<p>No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics Document Ref(s): APP-172, General</p>	<p>Context is provided to the assessment of ground noise through consideration of the secondary L<sub>Amax</sub> (maximum sound level), overflight, L<sub>den</sub> (average all day noise) and L<sub>night</sub> (average night time noise) noise metric. However, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear. There is also concern over the time period for L<sub>den</sub> as GMT appears to be used when local time should be consistently applied.</p> <p><a href="#">Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><a href="#">Updated position (Deadline 5): The Applicant should clearly set out their methodology for the use of L<sub>max</sub> when identifying significant effects.</a></p>	<p>Paragraph 14.4.79 of the ES explains: The assessment of significance is based primarily on the predicted levels and changes in the primary noise metrics and the factors described above, but additional noise metrics (the secondary noise metrics) are used to provide more detail on the changes that would arise.</p> <p>Seasonal and other movement data is provided in the Forecast Data Book.</p> <p>It is not clear where in the ES noise assessment it is indicated that GMT has been used to calculate L<sub>den</sub>. L<sub>den</sub> has been calculated using local time, not GMT.</p> <p><b>Updated Position (April 2024):</b> <a href="#">Ground noise is not modelled or assessed in terms of overflight, L<sub>den</sub> or L<sub>night</sub> levels which are used in the air noise assessment in accordance with CAA guidance.</a></p> <p><a href="#">For ground noise there is no specific guidance on how to rate the significance of noise effects. The ground noise assessment therefore considered ambient noise as context and the change in noise above ambient noise. The number of L<sub>max</sub> events above 65dB in the day and 60dB at night has also been used in addition to Leq levels in some cases in arriving at the overall assessment of significance. For example, in the Charwood, Riverside Horley, Bonnetts Lane, and Lowfield Heath Assessment Areas as discussed in Section 8 of ES Appendix 14.9.3 Ground Noise Modelling [APP-173].</a></p>	<p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a></p>	<p>Under discussion</p>
2.16.2.5	<p>Noise impacts from 'end-around' runways need sufficient consideration Document Ref(s): APP-173, APP-176</p>	<p>The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate effectiveness. Details on ground noise model inputs, including source and bund locations, should be provided. While the Applicant suggests it has sought to address this issue following comments made in the preapplication and consultation stages, the Council does not agree and future impacts have been considered or will be mitigated.</p>	<p>As reported in Section 14.9 of the ES noise from use of the end around taxiways has been assessed. Details of the ground noise modelling were presented and discussed in the TWG. Further clarification on the performance of the noise barriers and bund proposed will be given in the TWG.</p> <p><b>Updated Position (April 2024):</b> <a href="#">As explained in ES Chapter 5: Project Description [REP1-016] (paras 5.2.93 to 5.2.94), the western end of the existing noise bund would be removed, before</a></p>	<p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a></p>	<p>Not Agreed</p>



		<p><b>Updated position (Deadline 1):</b> LAmax noise levels from use of end-around-taxiways have been provided but only for context and not for identifying significant effects.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</p> <p><b>Updated position (Deadline 5):</b> 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.</p>	<p><a href="#">the new noise bund and wall is built to replace it. The western end would be removed within the first year of the airfield works, and there will be a period up to six months when part of the bund will be missing. <b>ES Appendix 5.3.3: Indicative Construction Sequencing</b> [REP2-016] shows the removal and replacement of the western noise mitigation as taking place between 2024 and 2026.</a></p> <p><a href="#">Noise modelling was undertaken that showed during this period levels of ground noise could increase by up to 3dB at the nearest noise sensitive receptor, Westfield Place. This property is within the Noise Insulation Scheme Inner Zone and the Applicant would ensure the full package of noise insulation is offered and provided to this property before the bund is removed, as required by the property owner. The requirement to do so will be confirmed in updates to be made in the Code of Construction Practice, to ensure there is a clear secured need to follow this methodology. Noise modelling showed that further away beyond this property the biggest noise increase would be no more than 1dB during this temporary period, which would not generate any additional significant effects.</a></p>		
2.16.2.6	Noise	<p>It is considered that the quantification of the impacts set out by the Applicant does not take into consideration the cumulative impacts of the different types of airport-related noise that have been modelled independently. This includes the combined effect of Gatwick's predicted baseline growth and the Northern Runway on awakenings (being woken up at night by aircraft noise) and the difference in the absolute sound levels within the district as a result of the NRP, which may also change over time.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> The Applicant should consider cumulative awakenings from air noise and ground noise sources.</p>	<p>Cumulative noise impacts are assessed in Section 14.11 of ES Chapter. 14. The reasons why this is done qualitatively instead of quantitatively are explained.</p> <p>The combined effect of Gatwick's predicted baseline growth and the Northern Runway Project on awakenings is quantified in section 7.3 of the Physiological Sleep Disturbance Assessment provided in ES Appendix 14.9.2 Air Noise Modelling [APP-172] where 2019, future baseline and future with Project awakenings are estimated. It is important to note that an awakening in this study is not the same as 'being woken up', rather it is a more subtle change of sleep state which in a healthy adult typically occurs about 20 times during an eight hour night and most of these awakenings are too short to be remembered the next morning.</p> <p><b>Updated Position (April 2024):</b> With regards awakenings, paragraph 7.4.2 of ES Appendix 14.9.3 clearly gives the total number of awakenings in the future baseline (ie with predicted baseline growth) as well as with the Project as follows (and is noted as lower than the 219 baseline):</p> <p><i>The numbers of awakenings estimated due to aircraft noise are as follows:</i></p> <ul style="list-style-type: none"> <li>2019 base 32,317</li> </ul>	<p><b>ES Appendix 14.9.2 Air Noise Modelling [APP-172]</b></p>	Not Agreed



			<ul style="list-style-type: none"> <li>• <a href="#">2032 Central Case base 26,508</a></li> <li>• <a href="#">2032 Central Case with Project 29,560</a></li> <li>• <a href="#">2032 STF Case base 29,061</a></li> <li>• <a href="#">2032 STF Case with Project 32,843</a></li> </ul>		
2.16.2.7	Noise	<p>The Applicant places an overreliance on limited metrics to describe and put controls on sound. The Council's view is that a range of metrics, stated for different periods, are needed to understand effects upon appropriate areas and the mitigation required. The Council also considers that there has been insufficient regard of the means as to how likely future policy changes might be taken into account in the management of air noise which could be pertinent to what can be implemented.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> <a href="#">Supplementary noise metrics were not used appropriately and should be used to identify likely significant effects.</a></p>	<p>All the relevant noise metrics have been modelled and reported so as to understand the effects on different areas.</p> <p>It is not possible to assess the effects of future policy until it is known. However, one area where the means as to how likely future policy changes might be taken into account, is <a href="#">for</a> a review of the Noise Envelope as described in the Section 6 of ES Appendix 14.9.7: The Noise Envelope [APP-177]</p> <p><b>Updated Position (April 2024):</b> <a href="#">The use of supplementary noise metrics is discussed above in 2.16.2.4 above. For air noise there is government guidance defines LOAELs in terms of Leq 16 hr and Leq 8 hr not any other metrics and government guidance and CAA guidance say how to assess significance of air noise in terms of these metrics not other metrics.</a></p>	Section 6 of ES Appendix 14.9.7: The Noise Envelope <a href="#">[APP-177]</a>	Not Agreed
<b>Assessment</b>					
2.16.3.1	Identification of significant effects regarding traffic Document Ref(s): APP-171, General	<p>It is acknowledged that minor increases in road traffic noise is expected on Charlwood Road and Ifield Avenue. These impacts are stated as not significant but they could be if absolute levels at the properties are above the SOAEL.</p> <p>The Council notes that later in the construction process there is significant related activity and concern is raised that this is not accompanied by robust traffic modelling. Such uncertainty also extends to concerns around the validity of transport modelling more generally. Should the modelling need to be rerun noise levels will again need to be reviewed.</p> <p><b>Updated position (Deadline 1):</b> Absolute noise levels should be provided at sensitive receptors to determine whether road traffic noise levels are below SOAEL.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5):</b> <a href="#">The Applicant has not addressed this matter.</a></p>	<p>Charlwood Road and Ifield Avenue road links were calculated to have a greater than L<sub>10, 18hr</sub> 1 dB change in noise (minor magnitude) in the construction (basic noise level [BNL]) assessment. The greatest change modelled was 1.4dB, during the day. The noise assessment modelled the three main construction scenarios where peak levels of construction traffic noise are expected. These minor changes in noise are calculated in two out of the three scenarios in the assessment during the daytime period where the Peak Highway Traffic Management measures are in place and during the Peak Highway Construction is being undertaken, when compared to the future baseline in 2029. No such changes were calculated at night-time.</p> <p>DMRB states (DMRB, 3.19) that any construction traffic noise impact shall constitute a significant effect where it is determined that a major (greater than or equal to 5.0 increase in BNL of closest public road used for construction traffic) or moderate magnitude (greater than or equal to 3.0 and less than 5.0 dB increase in BNL) are calculated in the following scenarios where construction durations exceed: 10 or more days or nights in any 15 consecutive days or nights; or a total number of days exceeding 40 in any 6 consecutive months.</p>	ES Chapter 14: Noise and Vibration <a href="#">[APP-039]</a>	Not Agreed

			<p>DMRB also states that it is appropriate to amend the final operational phase significance on noise sensitive buildings (DMRB, Table 3.60) under several circumstances. In the situation where do-something (i.e. with the Project) absolute noise levels are above the SOAEL value, a noise change in the short term of 1.0 dB or over results in a likely significant effect. However, all amendments to final significance in DMRB are limited to the operational assessment, and no such amendments are outlined for the construction assessment as effects are temporary.</p> <p>Nevertheless, the BNLs of road links associated with the minor increases in noise on Charlwood Road and Ifield Avenue due to the two construction scenarios were reviewed and are all below the SOAEL value.</p>		
2.16.3.2	Noise	<p>Despite requests to do so, the Applicant has refused to provide any data that will help explain how people will actually experience the sound, for example the single mode contours.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant has not provided any response to the request for information relating to single mode contours. The Applicant provides information on single mode noise at representative community locations (Table 4.2.1 to Table 4.2.14 [REP-APP-172] so clearly has modelled single mode contours. Through presenting the single mode noise predictions, the Applicant acknowledges that they provide important information on understanding noise effects. As such, it is requested that the Applicant provides single mode contours for all assessment years.</a></p>	<p>Single mode contours have been responded to previously at Row 13.100 of Table 13 in Appendix 1. Seven Community Representative Locations were chosen to describe impacts in more detail in paragraphs 14.9.150 to 14.9.158. These seven locations represent approximately half of the population within the 2032 Leq, 16 hour day 51 dB contour with the Project. ES Appendix 14.9.2: Air Noise Modelling [APP-172] provides 14 tables giving the full results of modelling for all noise metrics at each of these locations in the central and slower transition fleet cases. Leq, 16 hour day, Leq, 8 hour night, N65 day and N60 night levels are provided for easterly and westerly operating days, for 2019, the 2032 base case and the 2032 with Project case, to illustrate the changes in the noise environment that can be expected in each location.</p>	<b>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</b>	Not Agreed
2.16.3.3	Construction Noise and Vibration	<p>The Applicant does not justify or detail how construction will be scheduled to ensure the impact of noise on residents is mitigated during the build-out phases. For example, the noise barrier to the west of the runway is to be removed whilst construction proceeds and the runway will continue to be operational without any suitable mitigation. This will have significant impacts for Mole Valley residents and no details have been offered in relation to: · the duration and magnitude of the noise impacts while the barriers are removed; and · no information has been provided on the design and performance of proposed barriers that will be constructed.</p>	<p>The need to minimise the time when part of the existing noise bund will be removed before the new bund and barrier are complete has been recognised and hence has been addressed in the construction programme.</p> <p><b>Updated Position (April 2024):</b> <a href="#">As explained in ES Chapter 5: Project Description [REP1-016] (paras 5.2.93 to 5.2.94), the western end of the existing noise bund would be removed, before the new noise bund and wall is built to replace it. The western end would be removed within the first year of the airfield works, and there will be a period up to six months when part of the bund will be missing. ES Appendix 5.3.3: Indicative Construction</a></p>	n/a	Not Agreed

		<p><b>Updated position (Deadline 1):</b> No details regarding how this is addressed in the construction noise assessment are provided. There is no commitment to secure barriers/ bunds or the timings of construction.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> It is not clear what relevance row 2.13.4.5 is. Detailed results of ground noise modelling for the period when there will be no barrier in place should be provided and any temporary likely significant effects identified.</p> <p>The Applicant is referred to previous comments (MVDC Operational Ground Noise 08 [REP1-100]) requiring a specific design document to be provided to demonstrate the effectiveness of the barrier and its proposed construction details.</p>	<p><b>Sequencing [REP2-016]</b> shows the removal and replacement of the western noise mitigation as taking place between 2024 and 2026.</p> <p>Noise modelling was undertaken that showed during this period levels of ground noise could increase by up to 3dB at the nearest noise sensitive receptor, Westfield Place. This property is within the Noise Insulation Scheme Inner Zone and the Applicant would ensure the full package of noise insulation is offered and provided to this property before the bund is removed, as required by the property owner. The requirement to do so will be confirmed in updates to be made in the Code of Construction Practice, to ensure there is a clear secured need to follow this methodology. Noise modelling showed that further away beyond this property the biggest noise increase would be no more than 1dB during this temporary period, which would not generate any additional significant effects.</p>		
<b>Mitigation and Compensation</b>					
2.16.4.1	Measurement of ground noise to identify eligibility needs to be clear and robust Document Ref(s): APP-180	<p>Paragraph 1.1.3 (Environmental Statement: Appendix 14.9.10 – Noise Insulation Scheme) suggests that eligibility for the NIS will be on the basis of "...air noise levels predicted with the operation of the Northern Runway...". However, paragraph 4.1.11 suggests that "...Eligibility for the Inner Zone scheme noise insulation package due to ground noise will be established on the basis of measurements of levels of ground noise carried out after the Project is operating."</p> <p>This seems somewhat contradictory and all eligibility should be on the grounds of prediction to increase certainty.</p> <p><b>Updated position (Deadline 1):</b> More detail is required regarding the provision of ground noise insulation and how monitoring would be undertaken.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</p> <p><b>Updated position (Deadline 5):</b> MVDC's position is that properties should be mitigated before significant effects occur so relying on monitoring as a means to determine eligibility for insulation is not appropriate.</p>	<p>Air noise insulation is based on prediction, so as to allow the insulation to be installed in good time. The worst case year, 2032 is used. The air noise insulation scheme covers the vast majority of the area that could require insulation due to ground noise, because this is much smaller. As such it is expected that noise insulation for ground noise will in the vast majority of cases be installed as part of the installation of persons eligible based on air noise predictions. There are two small areas near the airport boundary specifically listed in Appendix 14.9.10 where ground noise could be at similar level or above air noise and noise measurement may be needed to confirm eligibility, these are to the north (Oakfield Cottages) and to the south of the airport (Lowfield Heath).</p> <p><b>Updated Position (April 2024):</b> The Applicant has provided further details of how provision of noise insulation will be prioritised and programmed in <b>5.3 ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032]</b>. Further details of properties qualifying for noise insulation due to ground noise and how this will be provided before the predicted noise impacts arise is given in <b>Supporting Noise and Vibration Technical Notes to Statements of Common Ground, Appendix B - Ground Noise Fleet Assessment (Doc Ref 10.13.2)</b> The Noise Insulation Scheme will be updated and resubmitted to the Examining Authority incorporating these additions at Deadline 4.</p>	<b>ES Chapter 14: Noise and Vibration [APP-039]</b>	Not Agreed

<p><b>2.16.4.2</b></p>	<p>Commencement of Eligibility Document Ref(s): Condition 18 of APP006, APP-180</p>	<p>It is unclear when noise insulation will be provided to residents impacted by ground and construction noise. There is insufficient and imprecise details preventing the Council from being able to understand the extent that mitigation of this type will be achieved.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">Properties in the ground noise outer zone should qualify for insulation. Details should be provided on the process of monitoring eligibility for ground noise compensation and the triggers for noise monitoring.</a></p>	<p>Further detail on implementation of the NIS is being prepared and will be shared with the TWG.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Applicant has provided further details of how provision of noise insulation including confirmation of when it will be provided for predicted permanent air and ground noise impacts in 5.3 ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032]. The Noise Insulation Scheme will be updated and resubmitted to the Examining Authority incorporating these additions.</a></p> <p><a href="#">The requirements for noise insulation from short term construction noise are laid out in the CoCP. The ES Chapter 14 predicts that Best Practicable Means measures to reduce construction noise may not be sufficient so that noise insulation could be required at 8 flats at 48a Longbridge Road and one house at 275 Balcombe Road. The local authority will be consulted during the Section 61 application to confirm if installation is required in accordance with the standards laid out in Section 5.9 of the CoCP.</a></p>	<p>n/a</p>	<p>Under discussion</p>
<p><b>2.16.4.3</b></p>	<p>The Code of Construction Practice (COCP) provides insufficient noise monitoring control and management of both long term work areas where (i) receptors will be exposed to intrusive noise for significant periods of time and (ii) areas of short term high impact events predicted to approach the Significant Observed Adverse Effect level (SOAEL) Document Ref(s): APP-082</p>	<p>Paragraph 5.9.15 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice), states that noise monitoring will be carried out to confirm the best practicable means. There is, however, insufficient information within the CoCP to identify areas of high noise impacts in advance of the construction work beginning. It is not acceptable to leave site specific monitoring to be determined in the Section 61. Policy requires adverse impacts to be mitigated and reduced. MVDC does not consider there to be sufficient support for contractors to assist them in demonstrating that they are managing and mitigating noise and other environmental impacts, such as vibration and dust (where appropriate).</p> <p><b>Updated position (Deadline 1):</b> Responses does not address mitigation concerns.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5):</b> <a href="#">Mole Valley does not accept the Section 61 process and the CoCP [REP4-008] requires sufficient advanced consideration of impacts and the Applicant is referred back to earlier comments in the Surrey LIR [REP1-097] and subsequent submissions</a></p>	<p>The CoCP provides the measures to manage and mitigate construction noise. Section 14.9 of the ES provides details of where significant adverse effects are predicted.</p> <p>Paragraphs 5.9.15 to 5.9.18 of the CoCP lay out the commitments to noise monitoring where adverse noise impacts are predicted. Details of the monitoring scheme will be developed once the main contractor is appointed making use of the programme of works proposed, including: baseline monitoring before works commence and impact monitoring during the works.</p> <p>The CoCP states as follows. In areas of low impact and daytime works a sampling approach will be adequate, and in areas of high impact or night-time works continuous monitoring may be required. It is expected that at least two continuous monitoring sites will be required for peak period of the highways works.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The CoCP requires the Section 61 process to be followed, noting <i>The Section 61 application will set out BPM measures to minimise construction noise and vibration, and The site-specific programmes for monitoring, including the type, location and duration will be detailed in the Section 61 applications and will be agreed with the local authority.</i> In order to set out BPM measures the contractor will be required to remodel construction noise based on the preferred methods of working. This process will identify areas of high noise impact in advance of the</a></p>	<p><b>ES Appendix 5.3.2: Code of Construction Practice (REP1-021)</b></p>	<p><del>Not</del> Agreed</p>



			<p><a href="#">construction work beginning, enabling noise monitoring to be focused in these areas as required. The Section 61 process has been used successfully on major projects to minimise disturbance and to enable local authorities to ensure all reasonable measures are taken before work begins.</a></p>		
2.16.4.4	<p>Core Working Hours are unacceptable and inadequately defined, result in unacceptable disturbance from intrusive noise Document Ref(s): APP-082</p>	<p>Paragraph CoCP states: "Outside the airport boundary, the core working hours will be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 07:00 to 13:00 on Saturdays." These hours are considered to be unacceptable and would result in unacceptable disturbance from intrusive noise.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5):</b> <a href="#">Additional information is accepted but the text provided needs to be mirrored in the COCP and it should be clear that HGV movements are not acceptable during the shoulder periods.</a></p> <p><a href="#">The Applicant is referred to paragraph 12.87 of the Surrey LIR [REP1-097].</a></p>	<p>In the CoCP where these core hours are stated, the following paragraph specifically addresses the issue of noise in these shoulder hours as follows:</p> <p><i>A period of up to one hour at the beginning and end of these core working periods is anticipated to be used for start-up and close-down of activities. This will include (but not be limited to) unloading, site briefings, inspection, refuelling, maintenance and general preparation work and housekeeping works. These activities will not include operation of plant or machinery that is likely to cause a disturbance to local residents or businesses.</i></p> <p>This commitment will be specified in the Section 61 application where necessary to address noise disturbance in the shoulder hour.</p> <p><b>Updated Position (April 2024):</b> <a href="#">To clarify for Core Hours working, these start up and close-down hours are within the core hours. So, within the core hours for Monday to Friday, 0700 to 1900, activities that could potentially cause noise disturbance will only be allowed between 0800 and 1800. Similarly, on Saturday within the core hours, 0700 to 1300, activities that could potentially cause noise disturbance will only be allowed between 0800 and 1200. These working hour are consistent with those used on other major projects to address noise disturbance. For working outside of these hours a Section 61 will be obtained as set out in the COCP.</a></p>	<p><b>working outside these arrangements</b></p>	<p>Not Agreed</p>
2.16.4.5	<p>Prevention of breaches in the Noise Envelope Document Ref(s): APP-177</p>	<p>Throughout the Noise Expert Group (NEG) led community consultations and up until November 2022, the Applicant stated there would be an action level (noise limit) which would be provided to enable and guide the enforcement mechanism. This has not occurred.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p>	<p>Noted, this was the case. At that time the Luton Airport development project was specifying actions levels within its Noise Envelope control process. However, whereas the process proposed at Luton was to apply a margin to the noise contour areas that occurred in the last year, the process proposed in the Gatwick project is forward looking forecasting noise contour 5 year ahead, rather than retrospective, so will provide greater certainty that a breach in future will be avoided <a href="#">(including requiring measures to be implemented and restricting capacity increases where breaches are predicted within the future 5 year period).</a></p>	<p><b>ES Appendix 14.9.7: The Noise Envelope [APP-177]</b></p>	<p>Not Agreed</p>

		<p><u>Updated position (Deadline 5): MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded.</u></p>			
2.16.4.6	<p>Night-time Noise limit</p> <p>Document Ref(s): Condition 14 of APP006, APP-177</p>	<p>The Noise Envelope does not make necessary attempts or provisions to restrict night time movements.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><u>Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated position (Deadline 5): Gatwick have night noise controls as part of their status as a designated airport and these controls relate to the summer and winter night periods. However, there is no guarantee that these controls would be retained if their designated status changed or DfT changed their approach to night noise controls. A commitment should be made in the DCO to retain and maintain these controls.</u></p>	<p>The noise envelope provides limits to restrict night-time noise.</p> <p>The Night Restrictions that include summer and winter night movements limits are enforced by the DfT for Gatwick Airport because it is designated for the purposes of noise regulation under the Civil Aviation Act 1982. It is therefore not necessary or appropriate for the DCO to replicate this regulation.</p>	<p><b>ES Appendix 14.9.7: The Noise Envelope [APP-177]</b></p>	<p>Not Agreed</p>
2.16.4.7	<p>Insufficient consideration of mechanisms for the prevention of breaches in the Noise Envelope</p> <p>Document Ref(s): Condition 14 of APP006, APP-177</p>	<p>It has not been possible to identify any mechanisms in the Application documents that provide a proactive plan which manage and prevent exceedances. Nor is there any detail on what proposed actions or mitigation might take place to achieve compliance in the event of a forecast breach. Currently two consecutive retrospective breaches are required before capacity restrictions are proposed.</p> <p><b>Updated position (Deadline 1):</b> Preventative mechanisms should be covered in detail in the Noise Envelope.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><u>Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated position (Deadline 5): MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be</u></p>	<p>The annual Noise Monitoring and Forecasting Report will provide forecast noise contours for the next five years specifically so as to ensure GAL has planned sufficient measures where necessary to remain within the noise envelope limits. The Noise Monitoring and Forecasting Report will not be approved by the Independent Review each year unless actions are included where necessary to ensure the forecast and associated noise modelling results are within the noise envelope.</p> <p>During consultation with the Noise Envelope Group presentations were given as to what actions could be taken if necessary, including changing aircraft charges and introducing a Local Rule which secures noise operating criteria in relation to future released slots. See P184 of ES Appendix 14.9.9 Report on Engagement on the Noise Envelope.</p> <p><u>Updated Position (April 2024): 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</u></p>	<p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [AS-023].</b></p>	<p>Not Agreed</p>



		<p><a href="#">applied during scheduling to provide confidence that noise limits would not be exceeded.</a></p>	<p><a href="#">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.</a></p> <p><a href="#">It is also not correct that two consecutive retrospective breaches are required before capacity restrictions bite. GAL shall not be permitted to declare any further capacity for additional air traffic movements from the airport where an AMFR either when submitted by GAL or when approved by the CAA or by the Secretary of State (as is relevant in the circumstances) identifies that a noise envelope limit is forecast to be exceeded, until an AMFR has been approved by the CAA or by the Secretary of State (as is relevant in the circumstances) which confirms compliance with the noise envelope limits identified to have been exceeded or which was forecast to not be complied with (as is relevant in the circumstances).</a></p>		
2.16.4.8	<p>Independent forecasting should involve relevant local authorities Document Ref(s): Condition 14 of APP006, APP-177</p>	<p>Any independent forecasting that needs to take place must ensure the involvement of relevant local authorities. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.</p> <p><b>Updated position (Deadline 1):</b> Forecasting is an important part of Noise Envelope compliance so should be subject to independent review.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><a href="#">Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><a href="#">Updated position (Deadline 5): MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded.</a></p>	<p>The air traffic forecasts made by the specialist aviation forecaster for the annual Noise Monitoring and Forecasting Report will be based on the best available information available on market trends within GAL and the airlines, so as to provide the most accurate forecast possible. It would be in no-one's interests to do otherwise as GAL would not want to face the consequences of breaching the noise envelope limits. The CAA are suitably qualified to review and approve those forecasts.</p>	<p><b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a></p>	<p>Not Agreed</p>

2.16.4.9	Independent verification Document Ref(s): Condition 14 of APP006, APP-177	<p>Any review of the air noise modelling and associated works must be independently verified. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">Information is accepted.</a></p>	<p>In response to this suggestion, section 7.4 of the Noise Envelope requires an Independent Expert to review the noise monitoring data and processing of the data for noise modelling, every 5 years, as suggested.</p>	ES Appendix 14.9.7: The Noise Envelope <a href="#">[APP-177]</a>	<del>Under discussion</del> <a href="#">Agreed</a>
2.16.4.10	Capacity declaration restrictions as a means of managing aircraft noise Document Ref(s): APP-177	<p>Section 7.3 of the Environmental Statement (Appendix 14.9.7: Noise Envelope) sets out intended measures to restrict capacity declarations. However, these measures would not prevent new slots being allocated within the existing capacity. Neither are they an effective means of preventing future noise contour limit breaches, especially if a breach occurred in the previous year.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</a></p>	<p>Paragraph 7.3.1 reads 'GAL shall not be permitted to declare any further capacity for additional air traffic movements from the airport where...'. Clearly the intention here is to disallow additional air traffic movements.</p> <p><b>Updated Position (April 2024):</b></p> <p><a href="#">The Noise Envelope covers the busiest three months of the year at which there is currently little available capacity and close to 100% slot utilisation over the operational day. From the point that the noise envelope is introduced, GAL will treat the noise envelope limits as a scheduling constraint such that there will be a link formed between it and the capacity declaration. The allocation of new slots in any year is predicated on the take-up of those slots not resulting in an exceedance of the noise envelope. The ATM forecast will be processed through the noise model to check it meets the noise envelope limit for the forecast capacity before the slots are allocated. This should ensure the subsequent allocation and take-up of those slots within the capacity declaration will not result in a forecasted exceedance of the noise envelope limits. It is anticipated that actual performance will track well to forecast performance, particularly as those are refined against one another over time through the production of the Annual Monitoring and Forecasting Reports, and this proposal is therefore considered to be the most effective method to prevent breaches arising.</a></p>	ES Appendix 14.9.7: The Noise Envelope <a href="#">[APP-177]</a>	Under discussion
2.16.4.11	Prevention of breaches in the Noise Envelope Document Ref(s): APP-177	<p>Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the Noise Envelope.</p> <p><b>Updated position (Deadline 1):</b> The Applicant response does not address the comment.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p>	<p>A technical note will be provided to the TWG providing further details of engine ground running noise levels and frequencies of occurrence at other receptor locations which demonstrates the Project will not give rise significant effects from engine ground running.</p> <p><b>Updated Position (April 2024):</b></p> <p><a href="#">The Noise Envelope proposed does not include trigger levels, because unlike the Luton proposal it requires forecasts five years</a></p>	n/a	Not Agreed

		<p><b>Updated position (Deadline 5):</b> MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded</p>	<p>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>		
2.16.4.12	<p>Slow case fleet transition (replacing older aircraft with newer, quieter ones) is not an acceptable basis for setting the Noise Envelope Document Ref(s): APP-177</p>	<p>This issue has been previously raised by the Council and the Applicant. In its Issues Tracker (Application Document(s): Response to PD005), the Applicant considers this to have been resolved. MVDC does not agree and slow case transition continues to be considered unacceptable. There is no adequate comparison of future technology gains within the 2019 baseline and noise levels have been assumed to be constant within the fleet over the next ten years. Using the slow transition case, as the basis of the Noise Envelope, provides no incentive for GAL to seek faster fleet transition and secure noise and other environmental benefits. The central case should be utilised and a more proactive approach taken by the Airport.</p> <p><b>Updated position (Deadline 1):</b> The slower case fleet results in increased noise levels in the 2029 assessment scenario and no benefits of new aircraft technology are shared with local communities.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">The Applicant's method for sharing the benefits is flawed as it allows for a substantial increase in noise contour area in the 2032 daytime period over the 2019 baseline. It is hard to understand how it can be justified that any benefits of new aircraft technology have been shared with the local community in this case.</a></p>	<p>As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted '<i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i>'.</p> <p>The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</p> <p>The ES considers noise impacts for the range of fleet transition between the central case and slower transition case and identifies mitigation for the worst case of these, the slower transition case.</p> <p><b>Updated Position (April 2024):</b> <b>ES Chapter 14: Noise and Vibration</b> [APP-039] paragraphs 14.2.40 to 14.2.48 describe the government's latest policy statement of aviation noise <i>Policy Paper, Overarching Aviation Noise Policy, DfT, March 2023</i>. This includes the following: <i>We consider that "limit, and where possible reduce" remains appropriate wording. An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits.</i> Thus, current government policy allows increases in noise, as is inevitable in the year the runway opens.</p>	<p><b>ES Appendix 14.9.5 Air Noise Envelope Background</b> [APP-175]</p> <p><b>ES Chapter 14: Noise and Vibration</b> [APP-039]</p> <p><b>The Applicant's Response to ExQ1 - Noise and Vibration</b> [REP3-101]</p>	Not Agreed

			<p><a href="#">and in terms of contours areas is forecast above the 2019 baseline for daytime noise, but not night-time noise.</a></p> <p><a href="#">The policy statement goes on: <i>In circumstances where there is an increase in total adverse effects, "limit" would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England.</i></a></p> <p><a href="#">The policy recognises that growth may increase noise impacts and that this increase may be offset by an increase in economic and consumer benefits. It also places increased emphasis on mitigation in such cases. The Project proposes an appropriate range of mitigation measures, in addition to the existing controls that will continue in connection with the operation of the airport, and this includes a substantially improved Noise Insulation Scheme (NIS), as discussed in Section 14.9, in line with the Noise Policy Statement for England.</a></p> <p><a href="#">The Applicant has provided further explanation of the analysis of sharing the benefits in response to Examining Authority's question NV.1.9 in <a href="#">The Applicant's Response to ExQ1 - Noise and Vibration [REP3-101]</a> which concludes: <i>Following the same methodology, the GAL analysis showed that in 2038 when the Noise Envelope limits reduce, compared to the future 2038 baseline the degree of sharing the benefits would be 50% to the industry (as growth) and 50% to the community (as noise reduction) when measured in terms of the area of the day LOAEL with the Slower Transition Fleet. For night-time the degree of sharing the benefits would be 34% to the industry (as growth) and 66% to the community (as noise reduction). It was noted that in the early years after opening noise increases and there is a smaller benefit to the community, and that the Central Case fleet had not been assessed.</i></a></p>		
<b>2.16.4.13</b>	Flexibility of noise contours limits accountability for airspace redesign and future aircraft technology	<p>The Applicant is seeking the flexibility to increase noise contour area limits, depending on airspace redesign and noise emissions from new aircraft technology. Should the NRP obtain consent, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope to ensure that unacceptable alterations are contained as far as is reasonably possible.</p> <p><b>Updated position (Deadline 1):</b> There should be no allowance for Noise Envelope limits to increase thus giving certainty to local communities on future noise levels.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p>	<p>As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the PEIR for the Local Authorities noted '<i>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case</i>'.</p>	<b>ES Appendix 14.9.5 Air Noise Envelope Background</b> <a href="#">[APP-175]</a>	Not Agreed



		<p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position that there should be no allowance for Noise Envelope limits to increase.</a></p>	<p>It is not agreed that airspace change (which is a project in its own right and subject to its own assessment) can reasonably be assessed in the ES. Moreover, the noise impacts of more carbon emissions efficient aircraft and legislative drivers for their adoption are not able to be predicted. For further information on those matters please refer to sections ,6.5 and 6.6 of the Noise Envelope Document.</p> <p>The Noise Envelope provides certainty for the periods which it is set in accordance with CAP1129. The noise envelope should reflect evidence of the improvements in average fleet noise performance over time and should not function to prevent airlines serving changing markets or introducing new carbon-efficient aircraft. There may also be extraordinary circumstances in which it could be necessary to review the noise envelope limits upwards. These points are fully as described in Sections 6.3 to 6.7 of the Noise Envelope.</p>		
2.16.4.14	CAA to regulate the Noise Envelope rather than relevant local authorities Document Ref(s): APP-177	<p>There is no mechanism for local authorities to review Noise Envelope reporting or take action against limit breaches or review any aspects of the Noise Envelope. To date, the CAA has not accepted a role regulating the Noise Envelope.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated position (Deadline 5):</b> <a href="#">MVDC are of the opinion that the joint local authorities should be part of a Noise Envelope scrutiny group.</a></p>	<p>The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.</p>	<b>ES Appendix 14.9.7 The Noise Envelope</b> <a href="#">[APP-177]</a>	Not Agreed
2.16.4.15	Modelling 2019 Air Transport Movements (ATM) with 2032 fleet technology Document Ref(s): APP-177	<p>Sensitivity testing of different growth rate scenarios (Appendix 14.9.7 The Noise Envelope) would help provide a better understanding of how noise may affect local communities in the future. The Council has consistent requested such testing to be carried out up to and including 2032, yet it has been argued that this is too far in advance to be material. The Council disagrees and this would be only eight years in the future. Furthermore, various other data has been modelled to 2032 and beyond, without issue, and it is unclear why this sensitivity testing has not been provided within the relevant Environmental Statement.</p> <p><b>Updated position (Deadline 1):</b> Ongoing.</p>	<p>The ES provides forecast noise modelling for the 2019 baseline, 2029, 2032, 2038 and 2047. For each year, noise contour data is provided for primary and secondary noise metrics, for the baseline and Project case, and for two rates of fleet transition. This is sufficient to assess the likely significant effect of the project and has allowed the ES to specify the required noise mitigation in line with guidance and policy.</p> <p>The ES provides 48 noise contour maps for 2019, 2032, and 2038. Noise contours for 2029 and 2047 are not mapped in the ES figures because noise impacts are higher in other years and shown by the population and contour area data that is provided for these years.</p>	<b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>	Under discussion

		<p><a href="#">Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><a href="#">Updated Position (Deadline 5): MVDC maintain their position on this matter</a></p>	<p>Contours for years mapped in the ES figures and the other years have been provided to LPAs on the TWG in the online Air Noise Viewer.</p> <p>Modelling of the 2019 base year movements with the predicted 2029 fleet mix has not been undertaken because this scenario will not arise because in all future years there will be some growth in traffic.</p> <p>The ES has considered two rates of fleet transition within the growth expected by the aviation forecasts. This is intended to help communities understand the likely significant effects of the Project. In the event growth were less, then the effects would be less than predicted by the assessments.</p>		
<p><b>2.16.4.16</b></p>	<p>Annual noise contour limits are necessary to understand the overall impacts from air traffic movements Document Ref(s): APP-177</p>	<p>The noise contour area limits provided relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period. Use of the summer average LAeq is not representative of the intrusive noise experienced by residents impacted by aircraft noise and should be more broadly considered to be representative.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><a href="#">Updated Position (Deadline 3): The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><a href="#">Updated position (Deadline 5): Gatwick have night noise controls as part of their status as a designated airport and these controls relate to the summer and winter night periods. However, there is no guarantee that these controls would be retained if their designated status changed or DfT changed their approach to night noise controls. A commitment should be made in the DCO to retain and maintain these controls.</a></p>	<p>This issue has previously been responded to at Row 13.55 of Table 13 in Appendix 1.</p> <p>Gatwick with the NRP will also be subject to an overall annual ATM limit of 386,000 movements. See para 6.1.3 of ES Appendix 14.9.7: The Noise Envelope.</p> <p><a href="#">Updated Position (April 2024): The limits are set for the whole 24 hour period by using 16 hour day and 8 hour night limits, and for the 92 day summer season which is the noisiest time of year when noise impacts are greatest. The convention for assessing and controlling noise from UK airports over the 92 day summer season has been in place for many years, both in DfT policy and CAA guidance primarily because UK airports tend to be noisier in the summer months because of increased travel abroad in our holiday season and also because in the summer when it is warmer windows tend to be open more, increasing noise levels inside buildings.</a></p> <p><a href="#">Noise levels at Gatwick are highest in the summer. ES paragraph 14.9.138 notes that summer season L<sub>eq 8 hr</sub> contours are about 35% larger than annual L<sub>night</sub> contours and summer season L<sub>eq 8 hr</sub> night noise levels are about 1.7dB higher than annual L<sub>night</sub> 8 hour noise levels.</a></p> <p><a href="#">Annual Lden and L<sub>night</sub> contours are provided for baseline and with Project conditions in Section 14.6 and 14.9 of ES Chapter 14 to illustrate noise changes over the whole year including the winter months. Section 4 of Appendix 14.9.2 provides tables of annual Lden and L<sub>night</sub>. Figures 14.9.28 and 14.9.39 show annual Lden and</a></p>	<p><b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>.</p>	<p>Not Agreed</p>



			<p><a href="#">L<sub>night</sub> contours. Para 14.9.136 to 14.9.139 discuss the changes in annual L<sub>den</sub> and L<sub>night</sub> contours compared to the changes in summer season Leq 16 hr and Leq 8 hour night contours. Paragraph 14.9.139 concludes as follows. <i>The increase in size of the annual L<sub>night</sub> contours in 2032 due to the Project compared to the 2032 base is 11-12%, which is slightly larger than the increase in the summer L<sub>eq,8 hr</sub> noise contours of 9%. The increase in area of the annual day evening night L<sub>den</sub> noise levels due to the Project in 2032 compared to the 2032 base is 17% which is the same as the increase in the summer daytime L<sub>eq,16 hr</sub> 51 dB contours in 2032. Overall, this suggests that any seasonality in the way the extra capacity delivered by the Project is used has little effect on noise levels across seasons. The Applicant therefore concludes that there is no need to add annual noise contour limits to limit noise impacts, and adding annual noise contours limits to the Noise Envelope would add complexity that is not necessary to meet the purpose.</i></a></p>		
<p><b>2.16.4.17</b></p>	<p>Failure to properly implement the Government's policy on Noise Envelopes (CAP1129) Document Ref(s): App-039</p>	<p>Various national aviation guidance and policy refer to an approach where there should be a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development. Sharing benefits is a fundamental part of the Noise Envelope and it should be demonstrated how the benefits of new aircraft technology are to be shared between the airport and local communities. The Applicant has failed to accept that there is any policy obligation to share technology gains with the community and this cannot be supported. In the earlier iteration of the Environmental Statement (Chapter 14: Noise and Vibration), Paragraph 14.2.44 included detail on 'Sharing the Benefits'. The submitted and revised ES has removed this contrary to relevant policy.</p> <p><b>Updated position (Deadline 1):</b> Sharing the benefits remains part of national aviation policy. The Applicant does not share any noise benefits from new aircraft technology up to and around 2029 in the slower transition fleet case.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 3):</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</p> <p><b>Updated position (Deadline 5):</b> The Applicant's method for sharing the benefits is flawed as it allows for a substantial increase in noise contour area in the 2032 daytime period over the 2019 baseline. It is hard to</p>	<p>Paragraph 14.2.44 described how the reference to Sharing the Benefits of aircraft noise emission reduction has been removed from the government's Overarching Aviation policy Statement in March 2023. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022.</p> <p>An illustration of sharing the benefits was discussed and is reported in pages 165 to 175 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p><b>Updated Position (April 2024):</b> The Applicant has provided further explanation of the analysis of sharing the benefits in response to Examining Authority's question <b>NV.1.9 in The Applicant's Response to ExQ1 - Noise and Vibration</b> [REP3-101] which concludes: <i>Following the same methodology, the GAL analysis showed that in 2038 when the Noise Envelope limits reduce, compared to the future 2038 baseline the degree of sharing the benefits would be 50% to the industry (as growth) and 50% to the community (as noise reduction) when measured in terms of the area of the day LOAEL with the Slower Transition Fleet. For night-time the degree of sharing the benefits would be 34% to the industry (as growth) and 66% to the community (as noise reduction). It was noted that in the early years after opening noise increases and there is a smaller benefit to the community, and that the Central Case fleet had not been assessed.</i></p>	<p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> [AS-023]</p> <p><b>The Applicant's Response to ExQ1 - Noise and Vibration</b> [REP3-101]</p>	<p>Not Agreed</p>

		<a href="#">understand how it can be justified that any benefits of new aircraft technology have been shared with the local community in this case.</a>			
2.16.4.18	Noise	<p>The Council considers that the proposal will adversely affect residents of Mole Valley and beyond due to an increase in exposure to aircraft noise during the day and night. The Council disagrees with the Applicant's interpretation of national policy in respect of aviation noise and this affects the approach and work which has been carried out by GAL to support its application. Concerns relate, but are not limited, to:</p> <ul style="list-style-type: none"> <li>the derivation of the proposed noise envelope limits;</li> <li>the identification and extent of various insulation zones (areas requiring mitigation measures);</li> <li>the approach to future mitigation and management of aviation noise, particularly at night and in the period from 06:00 to 07:00hrs;</li> <li>intrusive adverse noise impacts from ground operations and taxiing movements; and</li> <li>embedded issues with the consultation process with the community and local authorities which has resulted in poor understanding and engagement on noise envelope constraints and technical detail.</li> </ul> <p><b>Updated position (Deadline 1):</b> The ES identifies residual significant effects and is not policy compliant.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>	<p>The ES identifies approximately 80 properties where significant noise effects are predicted for the daytime, and 30 of the same properties for night-time, the majority of which are in MVDC, and the ES specifies noise insulation to address these. Elsewhere noise increase are not predicted to create significant noise effects.</p> <p>GAL notes the Council's disagreement and would be interested to understand how the Council interpret national policy and which specific parts of GAL's interpretation it disagrees with.</p> <p>GAL has consulted with the TWG since August 2021, explaining our proposed methodology and emerging findings and approach to mitigation. While it is not wholly clear what aspect of policy MVDC refer to, we note that policy on sharing the benefits has been discussed at the Noise Envelope Group and our interpretation, as discussed in summer 2022 is recorded in ES Appendix 14.9.9: Report on Engagement on the Noise Envelope including in pages 165 to 175.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The Applicant has explained the derivation of the proposed noise envelope limits required to give certainty to the communities affected. The applicant has explained the noise insulation zones and how they comply with policy. The applicant has developed a mitigation strategy compliant with policy. Ground noise has been assessed and mitigated in accordance with policy. The Applicant has consulted widely on noise matters consistent with policy requirements. The ES identifies noise mitigation measures compliant with noise policy, in particular so as to minimise the adverse effects predicted and to avoid significant adverse effects on health and quality of life within the context of government policy on sustainable development.</a></p>	<b>ES Appendix 14.9.9: Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a>	Not Agreed
2.16.4.19	Noise Envelope	<p>There are significant concerns in terms of the approach taken to Noise Envelope (NE) (CAP1129) matters and the process for the creation of a NE has not sufficiently involved the local authorities or the community groups nor has it been adequately explained.</p> <p>Furthermore, it has not properly taken into consideration views presented through the preapplication stage and consultation. In short, despite comments, advice and questions, the Applicant has chosen the worst environmental options which is likely to have the largest environmental</p>	<p>The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. ES Appendix 14.9.9 Report on Engagement on the Noise Envelope explains that a total of 12 two-hour meetings dedicated to the Noise Envelope process were held between 26 May and 11 October 2022 between the airport and stakeholders. A summary of wider consultation undertaken on the Noise Envelope since 2019 is also provided at Section 4.2 of Appendix 14.9.7 The Noise Envelope.</p>	<b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a>	Not Agreed

		<p>impacts as the basis for the NE leaving too much scope for detrimental outcomes.</p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>			
2.16.4.20	Noise Envelope	<p>The Council has observed that in the case of the Luton airport expansions project (PINS Reference: TR020001) there is an agreed process which is managed by the Environmental Scrutiny Group and requires that discussions which determine NE matters should be independently chaired by a suitably qualified person from within the UK aviation sector. It also requires that they should have agreed mechanisms to challenge forecasts and validate modelling and measurement processes and that all costs should be funded by the promoter. This has not been the case with the NRP.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> <a href="#">MVDC are of the opinion that the joint local authorities should be part of a Noise Envelope scrutiny group</a></p>	<p>The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.</p>	<p><b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a></p> <p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a></p>	Not Agreed
2.16.4.21	Noise Envelope	<p>The Council considers that the Noise Envelope, as presented, is not fit for purpose because it provides little incentive to stabilise noise levels let alone reduce them. It provides no adequate review and control mechanism or local accountability and no meaningful penalties or sanctions if there is a failure in compliance.</p> <p><b>Updated position (Deadline 1):</b> The Noise Envelope is not policy compliant nor fit for purpose.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>	<p>The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.</p> <p><b>Updated Position (April 2024):</b> <a href="#">As communicated previously, GAL does not control airline fleet procurement and the airport sits within well-defined existing regulatory frameworks governing noise management, airport charges, slots and the requirement to consult on noise related actions which could be operating restrictions. Airline feedback to the Noise Envelope Group also explained that many factors can influence fleet procurement, some of which could be outside of the airlines' control. The York Aviation review of the</a></p>	<p><b>ES Appendix 14.9.7: The Noise Envelope</b> <a href="#">[APP-177]</a></p> <p><b>ES Appendix 14.9.9 Report on Engagement on the Noise Envelope</b> <a href="#">[AS-023]</a></p>	Not Agreed

			<p><a href="#">PEIR for the Local Authorities noted 'We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case'. The reasons for adopting the Slower Transition Fleet noise contours areas are given in ES Appendix 14.9.5 Air Noise Envelope Background at Section 3.2.</a></p> <p><a href="#">The review, monitoring and enforcement process in respect of the Limits included as part of the Noise Envelope are included in sections 6 to 8 of the Noise Envelope (including the provision for 5 yearly reviews – section 6.2). The host local authorities will be provided with the annual monitoring and forecasting reports approved by the CAA. This will confirm the position in respect of compliance with the noise envelope. In the unlikely event of any breach of the terms of the DCO the Host LPA's may petition action and seek to rely on section 161 of the Planning Act 2008. Moreover, the host LPA's will also retain their role under Regulation 598/2014 in relation to the introduction of noise related operating restrictions pursuant to the DCO requirements. There is therefore a sufficient level of scrutiny and ability to take action provided for the host LPA's. The CAA, who have relevant knowledge and expertise, are the most appropriate persons to review the noise envelope submissions made pursuant to the DCO of the purpose of their verification.</a></p>		
2.16.4.22	Construction Noise and Vibration	<p>The NRP places an undue reliance on Significant Adverse Observed Effects levels and the Section 61 process to manage construction noise impacts. There needs to be more information to assess the likely duration and provide suitable mitigation and monitoring of specific adverse noise impacts from construction work at sensitive locations where extended periods of disturbance are to be reasonably anticipated.</p> <p><b>Updated position (Deadline 1):</b> A S61 allows for significant effects to occur and cannot be relied upon to secure mitigation.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 5):</b> MVDC maintain their position on this matter. All construction noise mitigation should be secured in the DCO</p>	<p>Section 14.9 of the ES provides a detailed account of the expected construction noise impacts and mitigation likely to be needed in specific areas of work so that the likely mitigation is understood ahead of the Section 61 application stage. The assessment takes due account of SOAEL as required in policy and guidance. Table 14.9.4, over 11 pages, describes the mitigation likely to be required and the durations expected in each area.</p> <p><b>Updated Position (April 2024):</b> <a href="#">The CoCP, as secured through the DCO, details the requirements on the Contractor to adopt Best Practicable Means to reduce noise and to demonstrate this to the Local Authority how this will be done when seeking approval for the planned works through Section 61 of the Control of Pollution Act. The Applicant expects the Local Planning Authorities to exercise their powers under Section 61 of the Control of Pollution act to ensure the Contractor adopts Best Practicable Means to minimise</a></p>	<p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a></p>	Not Agreed



			<a href="#">noise disturbance when granting prior consent for the works. This approach has been successfully adopted on major construction projects and has been effective. At Gatwick Airport runway resurfacing works at night have previously been carried out under Section 61 agreements with Crawley Borough Council.</a>		
2.16.4.23	Construction Noise and Vibration	<p>It is recognised that the Construction and Transport Management Plans will be essential to understanding the mitigation of impacts and that these would be forthcoming at a later stage. However, it is considered that draft management plans should be collaboratively prepared with local and highways authorities and commenced swiftly so that the information is available for consideration during the examination. Should the DCO be approved in the absence of management plans, implementation could fall short of what is necessary and appropriate.</p> <p><b>Updated position (Deadline 1):</b> Ongoing.</p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter</a></p>	GAL has been engaging with local authorities through TWGs on the proposed approach to construction and transport management plans. GAL is taking into consideration comments made on the detail at the appropriate stage in the process. We welcome any further detailed comments in respect of the DCO submission documents.	<b>Draft DCO (REP3-006)</b> <del>Dec-Ref-2.1</del>	Under discussion
2.16.4.24	Noise and Vibration	<p>The Applicant's proposals for mitigating aircraft noise overly relies on the noise insulation of properties. The proposals are too narrowly defined and should not solely be based on Leq. The extent of the noise contours, which would enable decisions to be made on whether someone qualifies for financial assistance for sound insulation measures, should be based on single-mode contours and not standard-mode contours as the Applicant proposes.</p> <p><b>Updated position (Deadline 1):</b> The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 5):</b> <a href="#">MVDC maintain their position on this matter.</a></p>	Section 3 of ES Appendix 14.9.2 Air Noise Modelling summarises the range of mitigation measures that will be used to minimise noise impacts, of which noise insulation is only one. Leq 16 hr and Leq 8 hour night are considered the most appropriate metrics to base the noise insulation scheme on. GAL has discussed the basis of the noise insulation scheme with the TWG. For single mode Leq contours, please see our response provided in Rows 13.4 and 13.100 of Table 13 in Appendix 1.	<b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a>	Not Agreed
2.16.4.25	Construction Noise and Vibration	<p>Noise insulation will often result in properties having to have sealed windows and/or relying on mechanical ventilation, such as air conditioning. Therefore, the Applicant must make provision for overheating assessments and related mitigation works to properties due to the increased risks that this will occur. Given the duration of the project and the magnitude of harm from the high levels of intrusive noise, the ventilation requirements should be assessed in accordance with the changing future climate circumstances which are likely to exacerbate the risks of overheating further and must be recognised now, as far as is practicably possible.</p>	The Noise Insulation Scheme will not seal any windows. Overheating has been addressed by the provision of acoustic ventilators to all rooms with acoustic insulation. Further details have been developed on the specification of these ventilators and this will be provided in the technical note on implementation of the scheme and shared with the TWG.	<b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>  <b>ES Appendix 14.9.10 Noise Insulation Scheme Update Note</b> <a href="#">[REP2-032]</a> .	Not Agreed

		<p><b>Updated position (Deadline 1):</b> Overheating is not addressed by acoustic ventilators, which only introduce fresh air and do not have any cooling capability.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated position (Deadline 5):</b> <u>Ventilators are not sufficient for reducing overheating. The Applicant has not addressed the matter of overheating other than to offer blinds to windows exposed to direct sunlight (paragraph 4.2.4 [REP4-017]), which MVDC deem as not sufficient.</u></p>	<p>Potential changes to the assessment as a result of climate change are reported in Section 14.10 of ES Chapter 14: Noise and Vibration [APP-039].</p> <p><b>Updated Position (April 2024):</b></p> <p><u>The Applicant has provided further details of the provision of noise insulation including the specification of acoustic ventilators to reduce overheating in ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032]. The specification is designed to provide two air changes per hour for most rooms to replicate the effect of partly open windows in a house whose occupants do not need to close windows to reduce noise.</u></p> <p><u>The Noise Insulation Scheme will be updated and resubmitted to the Examining Authority incorporating these additions.</u></p>		
2.16.4.26	Noise and Vibration	<p>Given the various negative impacts, the Council is concerned that there is no offer of compensation for people affected by the nuisance they are likely to experience for which they would otherwise have common law rights to apply for.</p> <p><b>Updated position (Deadline 1):</b> A S61 allows for significant effects to occur and cannot be relied upon to secure mitigation.</p> <p>The Applicant, in reviewing this SoCG, is referred to the Council's comments and supporting mitigation tables within the Joint Surrey Council's Local Impact Report.</p> <p><b>Updated Position (Deadline 5):</b> <u>MVDC maintain their position on this matter.</u></p>	<p>The Section 61 application and approval by the local authority will give the local authority opportunity to ensure best practicable means are used by the contractor to minimise noise impacts. The DCO does not override common law rights to compensation for nuisance.</p> <p><b>Updated Position (April 2024):</b> <u>The DCO which is sought does not alter any statutory basis on which compensation may be claimed in connection with the operation of the airport.</u></p>	n/a	Not Agreed
2.16.4.27	Noise and Vibration	<p>Fundamentally, the Council lacks confidence in the Applicant's plans to deliver and implement a meaningful noise control regime that takes into account the needs of the local communities. This view is informed by the Applicant's ineffective consultation process and the challenges MVDC faced when trying to work proactively with the Applicant on noise related matters.</p> <p><b>Updated Position (Deadline 5):</b> <u>MVDC maintain their position on this matter.</u></p>	<p>The ES lays out and commits to an effective means of managing the negative impacts of noise during construction that has been tried and tested on other projects.</p> <p><b>Updated Position (April 2024):</b> <u>The Applicant has engaged with the local authority on noise related matters through the Noise Topic Group, and to a lesser extent through the wider Noise Envelope Group as summarised in ES Appendix 14.3.2 Summary of PEIR and Updated PEI Responses - Noise and Vibration [APP-170] and has considered the views expressed, discussed options and endeavoured to address the concerns raised.</u></p>	<b>ES Chapter 14: Noise and Vibration [APP-039]</b>	Under discussion



**Other**

*There are no other issues relating to this topic within this Statement of Common Ground.*

2.17. Planning and Policy

2.17.1 Table 2.17 sets out the position of both parties in relation to planning and policy matters.

**Table 2.17 Statement of Common Ground – Planning and Policy Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
2.17.1.1	Quality of documentation and impact on PADSS  Document Ref(s): General	<p>The Applicant has consistently demonstrated an unwillingness to fully address the issues raised and the submitted documents are difficult to interpret in many cases including for the topics of noise, climate, transport and base case. There is a consistent lack of transparency with regard to key issues and this will necessitate a more fluid/iterative approach to how the Council will highlight principal areas of disagreement and engages in the examination process. For example, something which is not currently on the PADSS may need to be added as discussions evolve. Equally, an issue may come off the list where clear explanation and discussion resolves matters.</p> <p><b>Updated position (Deadline 1):</b> The Council included this as a general point which reflected challenges in the process at the time of compiling the PADSS.</p> <p>It is recognised that some of the key and requested information has become available since then and should continue to be supplied during examination, alongside discussion around specific issues.</p>	<p>The Applicant has consistently engaged with the LAs through the pre-application consultation stage, as detailed in the Consultation Report and demonstrated through the application's acceptance for Examination by the Planning Inspectorate. Annexes A and C of the Consultation Report bring together the Applicant's responses on a topic-by-topic basis to matter raised response to the 2021 and 2022 consultation stages.</p> <p>Since acceptance, the Applicant has continued to engage through the presentation of a series of Issues Tables/Trackers, such as this.</p> <p>Please may MVDC also clarify if it has any additional queries or concerns on the specific topic referenced (i.e. noise, climate transport and 'base' case) that is not covered by its RRs and PADSS (and therefore these Issues Tables).</p>	<p><b>Consultation Report [APP-218],</b></p> <p><b>Consultation Report Annex A, Autumn 2021 Consultation Issues Tables [APP-219]</b></p> <p><b>Consultation Report Annex B, Autumn 2021 Consultation Consultee response summaries [APP-220]</b></p> <p><b>Consultation Report Annex C, Summer 2022, Consultation Issues Tables [APP-221]</b></p>	No longer pursuing.
2.17.1.2	Adequacy of Consultation	<p>It is noted that the Examining Authority (ExA) has determined that the Applicant met the basic consultation requirements set by the Planning Act 2008. However, the Council maintains that the failings in terms of public and local authority engagement continue to present obstacles to the application. The Council is of the view that, had the process been carried out more thoroughly, many of the issues raised in this Representation would have been likely to have been resolved.</p> <p><b>Updated position (Deadline 1):</b> The Council accepts that the ExA has made its decision.</p>	<p>The Consultation Report describes the pre-application consultation and engagement that was undertaken in respect of the Project. The application has since been accepted for Examination by the Planning Inspectorate, in which it was confirmed that the Applicant has complied with the pre-application procedure requirements under the Planning Act 2008.</p>	<p><b>Consultation Report [APP-218]</b></p>	No longer pursuing.

2.18. Project Elements and Approach to Mitigation

2.18.1 **Table 2.18** sets out the position of both parties in relation to project elements and approach to mitigation matters.

**Table 2.18 Statement of Common Ground – Project Elements and Approach to Mitigation Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Project Elements and Approach to Mitigation within this Statement of Common Ground.</i>					

2.19. Socio-Economics and Economics

2.19.1 Table 2.19 sets out the position of both parties in relation to socio-economics and economics matters.

**Table 2.19 Statement of Common Ground – Socio-Economics and Economics Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
<b>Assessment Methodology</b>					
2.19.2.1	Overstatement of the wider, catalytic, and national level economic benefits of the NRP  Document Ref(s): APP-042, APP-245, APP-250, APP-251, APP-252	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. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.  The impact methodology needs to properly account for the specific catchment area and demand characteristics of each of London’s airports to ensure that the catalytic impacts of airport growth are robustly identified. 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><a href="#">Updated Position (Deadline 3): Work is ongoing between York Aviation and GAL 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 D5, Thursday 6 June.</a></u>  <u><a href="#">Updated Position (Deadline 5 - May 2024):No change at this time. Awaiting updated information from the Applicant and discussions are ongoing.</a></u>	<u><a href="#">Updated position (April 2024): Following TWGs, the Applicant is preparing a further explanatory note to go to the Council’s advisers.</a></u>	<u><a href="#">The Applicant’s Response to the ExA’s Written Questions (ExQ1) – Socio-Economic Effects [REP3-103] – SE.1.20.</a></u>	Under discussion
<b>Assessment</b>					
<i>There are no issues relating to the assessment for this topic within this Statement of Common Ground.</i>					
<b>Mitigation and Compensation</b>					
2.19.4.1	ESBS	It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans.	<u><a href="#">Updated position (April 2024): The Implementation Plan will include specific delivery plans for each of the 6 themes in the ESBS. These Delivery Plans will differentiate between BAU activity related to the relevant theme, details of any pilot activity currently being undertaken in that theme, and proposed delivery post consent.</a></u>  <u><a href="#">To support the development of the draft Implementation Plan, workshops were held on 25 March and 8 April with relevant stakeholders and representatives of the Joint Local</a></u>	<u><a href="#">Draft Section 106 Agreement Annex: ESBS Implementation Plan [REP3-069]</a></u>	<u><a href="#">Under discussion</a></u>

		<p><u><a href="#">Updated Position (Deadline 5 - May 2024):</a></u>No change at this time. Awaiting updated information from the Applicant and discussions are ongoing.</p>	<p><u><a href="#">Authorities.</a></u> To assist this work GAL shared examples of draft delivery plans (covering two ESBS themes) and used the workshop to explore delivery against each ESBS theme - including clear information on current BAU activity, and ESBS pilot activity. This work will continue at a workshop with JLAs on 30 May and will be used to inform the draft Implementation Plan.</p>		
2.19.4.2	ESG	<p>The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is misleading. The Applicant should make it clear what is already happening and what 'additionality' will happen only as a result of the NRP for public benefit in order to show transparency.</p> <p><u><a href="#">Updated Position (Deadline 5 - May 2024):</a></u>No change at this time. Awaiting updated information from the Applicant and discussions are ongoing.</p>	<p><u><a href="#">Updated position (April 2024):</a></u> <u><a href="#">Please refer to the response at Row 2.19.4.1 of this Table.</a></u></p>		<u><a href="#">Under discussion</a></u>
2.19.4.3	ESBS	<p>While seeking to justify the case for need and claiming economic benefit, the Applicant has missed the opportunity for innovative and more far-reaching economic and employment support to the local area beyond Horsham and Crawley. The Employment, Skills and Business Strategy (ESBS) (Environmental Statement Appendix 17.8.1, APP-198) for the NRP is based upon reasonable objectives and themes, but lacks 'SMART' focus. It sets out hypothetical outputs which arise from arguably undeliverable interventions and is not currently considered to demonstrate a realistic strategy for improvement.</p> <p>The Council would expect to see more details of deliverable and realistic activities and initiatives linked to people living in each local authority. The baseline should also 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.</p> <p>Primarily, 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 confidence that the outputs are achievable and otherwise essential to making the NRP successful.</p> <p><u><a href="#">Updated Position (Deadline 3):</a></u> Still awaiting an update from the Applicant, via the SoCG.</p>	<p><u><a href="#">Updated position (April 2024):</a></u> <u><a href="#">Please refer to the response at Row 2.19.4.1 of this Table.</a></u></p>		<u><a href="#">Under discussion</a></u>



		<p><u><a href="#">Updated Position (Deadline 5 - May 2024):No change at this time. Awaiting updated information from the Applicant and discussions are ongoing.</a></u></p>			
<p><b>Other</b></p>					
<p><i>There are no issues relating to this topic within this Statement of Common Ground.</i></p>					

2.20. Traffic and Transport

2.20.1 Table 2.1 sets out the position of both parties in relation to traffic and transport matters.

Table 2.20 Statement of Common Ground – Traffic and Transport Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
2.20.1.1	Parking	<p>As a general view, the Council does not consider the associated car parking proposals for the NRP to be robust and does not provide sufficient assurance that off-site and illegal parking activities will be lessened. There is a clear need for a detailed Parking Strategy that carefully considers and justifies the car parking requirements in the context of ambitious modal shift targets and surface access matters. The success, availability and costs of car parking will influence any modal shift and the collaborative and timely preparation of a suitable Parking Strategy would be welcomed to ensure detailed discussions on these matters can be explored and resolved.</p> <p><b>Updated position (Deadline 1):</b> The Council welcomes further information.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</p>	<p>Further information is being prepared on the justification for the proposed number of car parking spaces. This will be shared with MVDC in due course.</p> <p><b>Updated position (Deadline 1):</b> A Car Parking Strategy (Doc Ref. 10.5) has been submitted at Deadline 1.</p> <p><b>Updated position (April 2024):</b>  <a href="#">The Applicant submitted the Car Parking Strategy [REP1-051] at Deadline 1 which provides further information about the approach it proposes to take to delivering and managing car parking.</a></p> <p><a href="#">An updated Surface Access Commitments document [REP3-028] has been submitted at Deadline 3 which retains Commitment 8, under which the Applicant will provide funding to support local authorities in delivering parking controls in the surrounding area and enforcement actions against unauthorised car parking. The contribution is secured in the Draft Section 106 Agreement [REP2-004].</a></p>	<b>Car Parking Strategy</b> (Doc Ref. 10.5)	Under discussion
<b>Assessment Methodology</b>					
2.20.2.1	Parking	<p>In addition, the Council would like clarity regarding the calculations for parking spaces as it is not clear how they have been derived having undergone numerous changes since the preapplication process commenced. It would appear that there has been a reduction in proposed spaces from those set out in the Summer 2022 Consultation, yet there is no evidence to justify how and why this has changed. The Applicant must provide additional details, calculations and justifications for this.</p> <p><b>Updated position (Deadline 1):</b> The Council welcomes further information.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</p>	<p>Further information is being prepared on the justification for the proposed number of car parking spaces. This will be shared with MVDC in due course.</p> <p><b>Updated position (Deadline 1):</b> A Car Parking Strategy (Doc Ref. 10.5) has been submitted at Deadline 1.</p> <p><b>Updated position (April 2024):</b>  <a href="#">In addition to the Car Parking Strategy [REP1-051] submitted at Deadline 1, the Applicant has provided additional background to the calculation of future parking demand in The Applicant's Response to the Examining Authority's Written Questions (1) [REP3-104], specifically in response to questions TT.1.38, TT.1.39 and TT.1.41 which provide further narrative on the use of Park &amp; Fly trip volumes to determine future parking demand and the anticipated levels of parking provision in the assessment years of 2029, 2032 and 2047. These figures now exclude the 820 spaces at the Hilton hotel, as the Applicant has acknowledged the lapsing of the</a></p>	<b>Car Parking Strategy</b> <del>[REP1-051]</del>	Under discussion

			<a href="#">relevant planning permission (Section 4.6 of The Applicant's Response to Actions - ISHS2-5 [REP2-005]) and that these spaces should no longer be included in the future baseline or with Project figures. The Applicant is not seeking additional parking to compensate for those spaces</a>		
<b>Assessment</b>					
<b>2.20.3.1</b>	Inadequate rail strategy Document Ref(s): APP-258	<p>The Council considers that the Applicant's assertions that "...no significant increase in crowding on rail services is expected as a result of the Project," (Transport Assessment, paragraph 9.8.7) to be erroneous and has disregarded its own evidence which shows an increase in numbers and crowding. The proposals are consistently contradictory and does little for meeting expressed targets for modal shift away from the private car, despite making it clear that that the Gatwick Stations Upgrade project is intended to make rail travel to and from the airport more attractive. With such a unique and large scheme, there are real opportunities for economic and environmental benefits linked to increasing rail travel. No attempt has been made to take this up and the Applicant has not looked sufficiently beyond the NRP boundary to achieve this. It is not considered that the Applicant's proposals will be in the public benefit and does not make the most of the linkages and available networks. Instead it relies on existing plans to accommodate passenger numbers and does not seek to fund schemes on the network at stations such as East Croydon and Dorking Deepdene which could affect a notable change for the benefit of the airport and wider economy.</p> <p>With such a limited rail offer, accompanying road transport modelling must be updated to be more realistic about the levels of car use that will be more likely.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information. The Applicant is also referred to the comments of Surrey County Council as the local Highways Authority for Mole Valley.</a></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></p>	<p>The Gatwick Station project is included in the strategic modelling and therefore taken into account in the trips, the resulting mode share and the impact assessments undertaken on the rail network, Gatwick Station and highway network.</p> <p>The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The assessment highlights that rail services are typically busiest northbound towards London in the morning peak, and southbound towards Gatwick in the afternoon peak. Standing capacity would remain available on the busiest services. In general, the greatest increases in patronage related to the Project will be in the counter-peak direction.</p> <p><b>Updated position (April 2024):</b> <a href="#">Please see The Applicant's Response to Local Impact Reports [REP3-078]. The Applicant is continuing to undertake technical engagement with Network Rail in relation to the impacts of the Project. The assessment shows no significant effects and the Applicant does not therefore need to provide funding for rail improvements</a></p>	<p><b>Chapters 9 and 10 of Transport Assessment [AS-079]</b></p> <p><a href="#">The Applicant's Response to Local Impact Reports [REP3-078]</a></p>	Under discussion
<b>2.20.3.2</b>	Roads	<p>MVDC is prevented from being able to accept the Applicant's position that there will be little or no adverse impacts on the highway network relevant to wider Mole Valley and the SRN beyond the Longbridge Roundabout (APP-258), due to concerns over the modelling undertaken. As presented, there is a lack of sensitivity testing in the modelling regarding airport capacity and the different levels of uptake for alternative travel methods. There also appears to be more focus on the impacts in the Crawley area which underplays how areas, such as Horley, and Surrey networks will be</p>	<p>The committed mode shares are the result of the interventions tested in the strategic model. This is set out in Chapter 7 of the Transport Assessment. The SACs sets out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach.</p> <p>The transport modelling covers a large area which includes all roads in neighbouring Districts, as indicated in Diagram 5.3.3 of the Transport Assessment. A magnitude of impact assessment was</p>	<p><b>Transport Assessment [AS-079]</b></p> <p><b>Annex B: Strategic Transport Modelling Report of the Transport Assessment [APP-260]</b></p>	Under discussion

		<p>affected, especially given the multiple routes which can be used to access the M25.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></p>	<p>undertaken across the modelled area to understand the impact of the Project on junctions and links within the model. This process is outlined in Chapters 5 and 12 of the Transport Assessment and in section 6.12 of Annex B (Strategic Transport Modelling Report) of the Transport Assessment. The assessment results are presented in Section 12.8 of Annex B of the Transport Assessment.</p> <p><b>Updated position (April 2024):</b> <a href="#">No further update.</a></p>		
<b>Mitigation and Compensation</b>					
<b>2.20.4.1</b>	Inadequate public transport provision to effect modal shift Document Ref(s): APP-258	<p>The submitted application provides insufficient public transport provision for Mole Valley district as a whole and especially for the most populated areas in the north of the district in Dorking, Leatherhead and Ashted. The approach to coaches, buses and support for local commuters is not necessarily deliverable and will not be effective and instead will be detrimental to the wider community and businesses. Additional public transport provisions to serve Mole Valley need to be provided and information on funding and agreements with relevant operators shared. It is the Council's view that a notable modal shift to sustainable transport mechanisms is unachievable and not based on realistic or reasonable assumptions and forecasting. For such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.</p> <p><b>Updated Position (Deadline 3):</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information. The Applicant is also referred to the comments of Surrey County Council as the local Highways Authority for Mole Valley.</a></p> <p><b>Updated Position (Deadline 5 – May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></p>	<p>The Surface Access Commitments (SAC) document sets out bus and coach services identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility. The SAC represents the position we are committing to achieve, based on our modelling of mode choice and transport network operation. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares.</p> <p>The SAC sets out that GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility.</p> <p><b>Updated position (April 2024):</b> <a href="#">The Applicant has responded to the Joint Surrey LIR in The Applicant's Response to Local Impact Reports [REP3-078]. An updated version of ES Appendix 5.4.1: Surface Access Commitments [REP3-028] has been submitted at Deadline 3 which adds further detail to the commitments related to the interventions. The draft Section 106 Agreement [REP2-004] secures the funding provision for bus and coach services</a></p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b></p> <p><a href="#">The Applicant's Response to Local Impact Reports [REP3-078]</a></p>	Under discussion
<b>2.20.4.2</b>	Roads	<p>Concerns regarding the works to the Longbridge roundabout are also raised, with particular regard to and how the construction works will be mitigated. In particular, the diversion of pedestrian and cycle access across the roundabout are not considered to be sufficient. The level of disruption should not be underestimated and proper diversions, clear pathways and other public safety measures need to be reconsidered and implemented accordingly. More detail and clarity around mitigation measures should be provided.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></p>	<p>The proposals for construction phasing at Longbridge Roundabout, including diversions of pedestrian and cycle routes during construction, these are described for this preliminary design stage in ES Appendix 5.3.1 Buildability Report - Part B, Part 1, with traffic management stages illustrated in Appendix A - Surface Access Construction Stage Sketches. The preliminary proposal has identified the use of diversions, a temporary utility/pedestrian bridge to maintain access around the south side of the works and includes hoardings to separate pedestrian and cycle users from the works.</p> <p>GAL will continue to engage with National Highways and Local Highway Authorities in developing the construction phasing and buildability proposals for the scheme as part of technical</p>	<p><b>Environmental Statement - Appendix 5.3.1 Buildability Report Part B, Part 1 [APP-080].</b></p>	Under discussion

			<p>engagement expected to form part of the development of the detailed design of the scheme proposals after the DCO has been granted.</p> <p><u><a href="#">Updated position (April 2024): No further update.</a></u></p>		
2.20.4.3	Public Transport	<p>Regarding buses, the proposed frequencies for the enhanced services would be paid for by the Sustainable Transport Fund, which is set out in GAL's current Section 106 Agreement. However, there is insufficient information on whether such funding is actually available. While contributions to the public transport network is welcomed, none of the limited provisions for Mole Valley, would serve beyond the rural south of the district. In terms of coaches, Route 3 via Oxshott is no longer in the NRP and none of the now proposed coach routes would directly serve Mole Valley. The proposals are counterproductive to securing real benefits of public transport and maintaining viability of those services.</p> <p><u><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></u></p>	<p>Further information is being prepared on the mechanism for supporting the bus and coach initiatives, including sources of funding such as the Sustainable Transport Fund.</p> <p>The commitments within the Surface Access Commitments document represent the position we are committing to achieve, based on our modelling of mode choice and transport network operation. The interventions we propose in the SAC have been included in our modelling, which provides confidence that the mode share commitments can be achieved with those interventions in place. The bus and coach service enhancements were developed with consideration of services which would be most likely to make greatest difference to mode shares.</p> <p>The SAC sets out that GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility.</p> <p><u><a href="#">Updated position (April 2024): An updated version of ES Appendix 5.4.1: Surface Access Commitments [REP3-028] has been submitted at Deadline 3 which adds further detail to the commitments related to the interventions. Paragraph 5 of Schedule 3 to the draft DCO S106 Agreement [REP2-004] secures a minimum £10 million investment from the Applicant to support the introduction or operation or use of bus and coach services.</a></u></p>	<b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b>	Under discussion
2.20.4.4	Public Transport	<p>For local residents who commute to Gatwick either to work at the airport or to access the train station, the Local Commuter Zone scheme has proven helpful. However, there are no plans to expand the current zone in response to the NRP. In the absence of a comprehensive public transport offer, it stands to reason that there will continue to be a reliance on private vehicles, impacting on the Applicant's commitments to altering modal share. It seems unreasonable to provide insufficient public transport options, while also failing to support those workers and commuters who are forced to travel by car.</p> <p><u><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. However, it is the Council's view that it is not necessary to further pursue the matter of expanding the Local Commuter</a></u></p>	<p>GAL is committed to the mode shares set out in the SAC. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application, as set out in Chapter 7 of the Transport Assessment. The SACs set out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach. Based on the assessment contained in the Application, no further mitigation is required.</p> <p><u><a href="#">Updated position (April 2024): The position remains unchanged and the Project is not proposing any changes to the Local Commuter Zone in order to mitigate impacts of the Project, because this is not necessary. The Applicant will continue to engage with</a></u></p>	<b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b>	<del>Under discussion</del> No longer pursuing.



		<a href="#">Zone specifically. The emphasis for assisting local residents should be focused on securing and increasing modal shift and access to public transport and more sustainable means of transport.</a>	<a href="#">Mole Valley District Council on this matter and any changes that do arise are likely to be part of the ongoing ASAS process.</a>		
2.20.4.5	Public Transport	<p>Compounding the Council's view that local workers are not being supported by the Application is the lack of provision for 'out of hours' workers and/or those catching early or late flights. While it is acknowledged that there is a limit to when buses and trains can operate more generally, there has been no consideration of whether employee minibuses or pocket park and rides could be of benefit. Once again, for such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.</p> <p><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></p>	<p>The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The need for early morning and evening services is recognised by GAL and rail and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as the potential for strengthening weekend services.</p> <p><a href="#">Updated position (April 2024): No update to Applicant's position.</a></p>	Chapter 11 of <b>Transport Assessment [AS-079]</b>	Under discussion
2.20.4.6	Rail	<p>The Council considers that rail-based provisions intended to offset the development and serve passengers and commuters are not extensive enough to provide real public and economic benefit. Despite the Applicant's assertions that the planned Gatwick Station upgrades and rail project will provide suitable rail interventions, a large amount of this work relates to improving on site facilities and not necessarily the frequency and efficiency of services. While some increases are planned to take place (2-3 extra peak hour trains and 10 extra off-peak trains per hour), this is scheduled to happen regardless of the NRP and therefore is not a direct result of it.</p> <p><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a></p>	<p>GAL is committed to the mode shares set out in the SAC. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application, as set out in Chapter 7 of the Transport Assessment. The SACs set out clearly the commitments both to the measures and to achieving the mode shares, together with the proposed monitoring approach. Based on the assessment contained in the Application, no further mitigation is required.</p> <p>The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. The need for early morning and evening services is recognised by GAL and rail and bus operators, as set out in paragraph 11.2.9 of the Transport Assessment, as well as the potential for strengthening weekend services.</p> <p><a href="#">Updated position (April 2024): The Applicant is continuing to undertake technical engagement with Network Rail in relation to the impacts of the Project. The assessment shows no significant effects and the Applicant does not therefore need to provide funding for rail improvements</a></p>	<p><b>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</b></p> <p>Chapter 11 of <b>Transport Assessment [AS-079]</b></p>	Under discussion
2.20.4.7	Rail	<p>The Council considers the Applicant to have been short sighted on rail matters and not to have looked at wider strategic opportunities that would reap rewards for the airport. Two key examples are East Croydon Station and Dorking Deepdene.</p> <p><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the</a></p>	<p>A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the Transport Assessment and the full set of rail data is included in ES Appendix 12.9.2 Rail Passenger Flows. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation.</p>	Chapter 9 of <b>Transport Assessment [AS-079]</b>	Under discussion

		<a href="#">Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a>	<a href="#">Updated position (April 2024): The Applicant is continuing to undertake technical engagement with Network Rail in relation to the impacts of the Project. The assessment shows no significant effects and the Applicant does not therefore need to provide funding for rail improvements</a>		
2.20.4.8	Rail	<p>In the case of East Croydon, the Applicant has acknowledged in its Transport Assessment (APP-258), the significance of the station as part of the rail network. However, it underplays the importance of necessary upgrades to East Croydon Station and the Windmill (Selsdon) Junction, both of which present obstacles to increasing capacity and access into and out of London and the wider Brighton Line via Gatwick. While Paragraph 9.4.22 recognises the additional trains that improvements could bring to Gatwick, it also accurately notes that there is no current funding commitment for the works (paragraph 9.4.21), which have been on Network Rail's future plans for some time, so the works remain undeliverable. Given the acknowledged benefits these upgrades could bring to both the airport and wider local economy, the Council is unclear why the NRP has not sought to support and contribute funding to these works, further offsetting its impact and actually delivering notable rail improvements for the airport.</p> <p><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a></p> <p><a href="#">It is, however, noted that there are wider challenges with the East Croydon upgrades that may not fall within the responsibilities of the Applicant and which are outside of their control. As such, the Council are no longer pursuing this issue and will rely on the input of Network Rail and other relevant stakeholders, to highlight issues and opportunities if they exist.</a></p>	<p>A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the Transport Assessment and the full set of rail data is included in ES Appendix 12.9.2 Rail Passenger Flows. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation.</p> <p><a href="#">Updated position (April 2024): The Applicant is continuing to undertake technical engagement with Network Rail in relation to the impacts of the Project. The assessment shows no significant effects and the Applicant does not therefore need to provide funding for rail improvements</a></p>	Chapter 9 of <b>Transport Assessment [AS-079]</b>	<del>Under discussion</del> <a href="#">No longer pursuing.</a>
2.20.4.9	Rail	<p>For Dorking Deepdene, MVDC notes that it is proposed to increase services on the North Downs Line from 1 to 2 trains per hour in the forecast models. However, there is little regard to the station which currently suffers from a deteriorating structure and facilities and poor accessibility issues, all of which, if remedied, would greatly increase rail usage. This opportunity has been overlooked and the Applicant should commit to exploring investment to resolve accessibility issues at Dorking Deepdene and more innovative solutions to relevant stations elsewhere on the feeder network for the airport. GAL is also well placed to widen these conversations with external stakeholders to secure delivery.</p> <p><a href="#">Updated Position (Deadline 5 – May 2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways</a></p>	<p>The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation. Paragraphs 9.6.4 to 9.6.5 of the Transport Assessment set out the impact of the Project on the North Downs Line.</p> <p><a href="#">Updated position (April 2024): No update to Applicant's position.</a></p>	<b>Transport Assessment [AS-079]</b>	<del>Under discussion</del> <a href="#">No longer pursuing</a>

		<p><a href="#">Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a></p> <p><a href="#">It is, however, noted that there are wider challenges with Dorking Deepdene upgrades that may not fall within the responsibilities of the Applicant and which are outside of their control. As such, the Council are no longer pursuing this issue and will rely on the input of Network Rail and other relevant stakeholders, to highlight issues and opportunities if they exist.</a></p>			
2.20.4.10	Rail	<p>Increasing the rail offer has no negative effects on the NRP. Instead, it assists with a securing positive modal shift away from private cars for which GAL is responsible. With these comments in mind and clear issues relating to the validity of rail-based claims, it is necessary for the Applicant to carry out additional modelling which places less reliance on non NRP-related rail improvements and usage and which more closely reflect what is more likely to happen.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a></p>	<p>The Surface Access Commitments document presents the mode shares and interventions GAL are committing to achieve, based on our modelling of mode choice and transport network operation. The rail assessments contained in the Application show that there is no significant adverse impact on rail services which requires mitigation.</p> <p><b>Updated position (April 2024):</b> <a href="#">The Applicant is continuing to undertake technical engagement with Network Rail in relation to the impacts of the Project. The assessment shows no significant effects and the Applicant does not therefore need to provide funding for rail improvements</a></p>	ES Appendix 5.4.1: <b>Surface Access Commitments</b> [ <a href="#">APP-090</a> ]	Under discussion
2.20.4.11	Rail	<p>Due to the lack of early and deliverable commitments to modal shift and sustainable transport options, waiting for firmer proposals through the Airport Surface Access Strategy (ASAS) would not be beneficial and conversations regarding all modes of public transport should take place during examination.</p> <p><b>Updated Position (Deadline 5 – May 2024):</b> <a href="#">Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</a></p>	<p>Commitments to modal shift and interventions to encourage sustainable travel patterns are set out in the Surface Access Commitments and will frame the preparation of a future ASAS in due course.</p> <p><b>Updated position (April 2024):</b> <a href="#">An updated version of ES Appendix 5.4.1: Surface Access Commitments [REP3-028] has been submitted at Deadline 3 which adds further detail to the commitments related to the interventions.</a></p>	ES Appendix 5.4.1: <b>Surface Access Commitments</b> [ <a href="#">REP3-028</a> ] <del>[APP-090]</del>	Under discussion
2.20.4.12	Parking	<p>MVDC welcomes funding commitments to support local authority enforcement actions in relation to off-airport parking but would like to know the levels of support and specific details on what this funding will and will not apply to. Through the refinement of the S106 and other funding discussions, this can be clarified. However, the Applicant must already have an idea of such costs and so should be able to make these available to local authorities enabling the discussions to commence swiftly.</p> <p><b>Updated position (Deadline 1):</b> The Council welcomes further information.</p>	<p>Further information is being prepared on the application of the funding measures in support of the Surface Access Commitments.</p> <p><b>Updated position (April 2024):</b> <a href="#">An updated version of ES Appendix 5.4.1: Surface Access Commitments [REP3-028] has been submitted at Deadline 3 which adds further detail to the commitments related to the interventions. Schedule 3 of the Draft S106 Agreement [REP2-004] sets out the funding for surface access.</a></p>	ES Appendix 5.4.1: <b>Surface Access Commitments</b> [ <del>APP-090</del> <a href="#">REP3-028</a> ]  <a href="#">Draft S106 Agreement [REP2-004]</a>	Under discussion

		<p><u><a href="#">Updated Position (Deadline 5–May-2024): Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</a></u></p>			
<p><i>Other</i></p>					
<p><i>There are no other issues relating to Traffic and Transport within this Statement of Common Ground.</i></p>					

2.21. Waste and Materials

2.21.1 Table 2.21 sets out the position of both parties in relation to waste and materials matters.

**Table 2.21 Statement of Common Ground – Waste and Materials Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Waste and Materials in this Statement of Common Ground.</i>					



2.22. Water Environment

2.22.1 Table 2.22 sets out the position of both parties in relation to water environment matters.

**Table 2.22 Statement of Common Ground – Water Environment Matters**

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<b>Baseline</b>					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
<b>Assessment Methodology</b>					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
<b>Assessment</b>					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
<b>Mitigation and Compensation</b>					
2.22.4.1	Water	<p>The Council wishes to highlight that local officers have observed the water level just a few inches below the bridge soffit at Longbridge Roundabout, where there is a culmination of water sources from the River Mole, the Gatwick stream and a discharge canal. The Applicant has suggested that the peak flow rate at this location, pre and post construction, will remain the same but that the discharge will be for a longer period of time and therefore unlikely to overwhelm the bridge. However, concerns are raised that this will only stand if there is no obstruction to the flow within the watercourse downstream of this area. The Council requests more clarity on how potential obstructions will be prevented or mitigated.</p> <p><u>Updated Position (Deadline 5 - May 2024):</u>The Council are content that this matter as far as is practicably possible It is noted that this matter is not raised as an issue by the LLFA or the EA.</p>	<p>Hydraulic modelling undertaken to inform the Flood Risk Assessment demonstrates that the Project would not increase peak water levels in the River Mole.</p> <p>The pre-existing risk of debris blocking any of the local watercourses would not b2e altered by the Project. Therefore should a watercourse blockage occur, the Project would not exacerbate subsequent effects.</p> <p>The baseline River Mole hydraulic model has been reviewed and accepted by the Environment Agency.</p> <p><u>Updated position (April 2024):</u> The Applicant would welcome an updated position or response from MVDC against this SoCG item, or confirmation if this item can be marked as 'agreed' or 'no longer pursuing'.</p>	ES Appendix 11.9.6: Flood Risk Assessment [APP-147]	<del>Under discussion</del> Agreed
<b>Other</b>					
There are no other issues relating to this topic within this Statement of Common Ground.					

### 3 Signatures

3.1.1 The above SoCG is agreed between the following:

Duly authorised for and on behalf of Gatwick Airport Limited, The Applicant	Name
	Job Title
	Date
	Signature
Duly authorised for and on behalf of Mole Valley District Council	Name
	Job Title
	Date
	Signature

## Appendix 1: Record of Engagement Undertaken

Date	Form of Correspondence	Details
13 February 2019	In-Person Meeting	TWG on DCO Application
7 March 2019	In-Person Meeting	NRP update given to Gatwick Officers Group
8 May 2019	In-Person Meeting	TWG on NRP update
5 June 2019	In-Person Meeting	NRP update given to Local Authorities Gatwick Officers Group
20 August 2019	In-Person Meeting	TWG on Land Environment
21 August 2019	In-Person Meeting	TWG on Surface Access and Transport
28 August 2019	In-Person Meeting	TWG on Air Quality, Carbon and Climate Change, and Major Accidents and Disasters
28 August 2019	In-Person Meeting	TWG on Economics and Employment
29 August 2019	In-Person Meeting	TWG Meeting on Noise
3 September 2019	In-Person Meeting	Technical Officers Group Meeting
18 September 2019	In-Person Meeting	Health Stakeholder Group Meeting
26 September 2019	In-Person Meeting	TWG on MAAD
27 November 2019	In-Person Meeting	TWG on Consultation Update
27 January 2020	In-Person Meeting	TWG Air Quality, Carbon and Climate Change and MAAD
30 January 2020	In-Person Meeting	TWG Economics and Employment
3 February 2020	In-Person Meeting	TWG on Land Based Topics
4 February 2020	In-Person Meeting	TWG on Surface Access
5 February 2020	In-Person Meeting	TWG on Noise
6 February 2020	In-Person Meeting	TWG on Water Environment
26 February 2020	In-Person Meeting	TWG on Consultation Update
27 July 2021	Virtual Meeting – MS Teams	TWG on Surface Access
29 July 2021	Virtual Meeting – MS Teams	TWG Landscape, Visual and Land and Water Environment
3 August 2021	Virtual Meeting – MS Teams	TWG on Economy, Employment, Housing and Health
4 August 2021	Virtual Meeting – MS Teams	TWG on Health and Wellbeing
5 August 2021	Virtual Meeting – MS Teams	TWG on Land Use and Recreation, Geology, Heritage, and Ecology
12 August 2021	Virtual Meeting – MS Teams	TWG on Air Quality, Carbon and Climate Change, and MAAD
16 March 2022	Virtual Meeting – MS Teams	TWG on Post Consultation Update
4 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
11 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
12 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation update and Design)
16 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
17 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport

25 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Forecasting & Capacity)
07 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
09 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
14 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
15 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
20 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
21 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
28 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
29 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
5 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
7 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
14 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
26 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
27 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
8 August 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
16 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
26 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
27 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
28 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
3 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
4 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
14 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
19 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
21 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
31 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
1 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
2 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
7 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
8 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
8 November 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
10 November 2022	Virtual Meeting – MS Teams	Minerals Scoping meeting with WSCC/SCC

18 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ (mop up session)
23 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
24 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
29 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
30 November 2022	Virtual Meeting – MS Teams (Recorded)	LLFA/GAL meeting on FRA and River Mole culvert
2 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
5 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
6 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
8 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
12 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Major Accidents & Disasters
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise (Noise Envelope)
14 December 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
4 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
16 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
17 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
18 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon
19 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Health and MAAD
31 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
8 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
9 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
7 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
13 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air-Quality
14 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
10 November 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Highways)
11 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Greenhouse Gases
12 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Employment Skills & Business Strategy
13 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
15 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Post-COVID Modelling)
20 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise



9 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Ops and Capacity
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Catalytic Impacts Assessment
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Needs and Forecasting