



Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Tandridge 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 Tandridge 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.

1.1.8 It can be assumed that any matters not specifically referred to in Section 2 of this SoCG are not of material interest or relevance to Tandridge District Council; and therefore, have not been the subject of any discussions between the parties, or have been previously discussed and addressed through the DCO process. As such, those matters should be assumed to be agreed, unless otherwise raised in due course by any of the parties.

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
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
2.2.2.1	Particulate Matter Standards	<p>The construction impact assessment requires revision to reflect the updated particulate matter standards. The ES assessment is based on advice that uses the older air quality standards. The latest PM2.5 standards are much more stringent and should be reflected in the ES. The concern is that human health impacts have not been fully assessed in the construction impact assessment.</p> <p>Updated position (Deadline 1): It is proposed that a Dust Management Plan (DMP) is prepared to address Council concerns during the examination. No DMP has been provided which clearly sets out specific mitigation measures to ensure potential adverse impacts from construction dust are avoided during all construction stages.</p> <p>Updated position (Deadline 5): 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.</p> <p>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.</p>	<p>The effects from demolition and construction of the Project have been assessed using the qualitative approach described in the Institute of Air Quality Management (IAQM) dust guidance. Changes to pollutant concentrations as a result of vehicles associated with construction and NRMM activities plants have been assessed. Details on the construction assessment are provided in 13.5.44 to 13.5.55 of Chapter 13 and the air quality assessment methodology. The assessment of construction has been based on the best estimate of emissions and conservative assumptions where applicable.</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. Mitigation measures for high-risk activities are considered during all periods of work to minimise dust soiling or human health effects. With the application of these mitigation measures, all effects can be reduced to a negligible level.</p> <p>Updated position (Deadline 1): A note explaining the draft Outline CDMP will be shared with the LAs for comment by 26th 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>Updated Position (April 2024): The Draft Construction Dust Management Plan (CDMP) has been shared with local authorities for comment on 26th 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 on the document in due course.</p> <p>Updated position (Deadline 5): The Applicant will review and provide a response to the comments made on the DMP at Deadline 6.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]</p> <p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p>	Under discussion

<p>2.2.2.2</p>	<p>Worse-case assessment</p>	<p>The lack of clarity on the selection of assessment years and their configuration re operation and construction gives TDC concerns that the worst-case scenario has not been assessed.</p> <p>Updated position (Deadline 1): It is welcomed that GAL propose to provide further information at the next air quality TWG. This matter will remain under discussion until this TWG has been held.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>Traffic modelling has been undertaken for two construction scenarios, airfield construction and surface access (highways) construction. Further detail is contained in the Transport Assessment. The construction scenarios assume the peak construction traffic flows applied to the first year of airfield (2024) and surface access (2029) construction which is a conservative assumption since emissions and background concentrations are anticipated to improve in future years.</p> <p>As set out in paragraph 13.5.53 of ES Chapter 13: Air Quality, the 2029 surface access construction scenario represents years 2029-2032, during which there will be an overlap with the operation of the Project. The 2029 surface access construction scenario is a combined scenario considering the contribution from both construction and operational traffic over this period to represent a realistic worst case assessment.</p> <p>GAL proposes to set out the model scenarios and provide that summary at TWGs to be arranged for Q1 2024.</p> <p>Updated position (Deadline 1): GAL has set out the model assessment scenarios within Appendix D of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4).</p> <p>Updated position (April 2024): The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p> <p>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].</p>	<p>Transport Assessment [AS-079]</p> <p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix D of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	<p>Under discussion</p>
<p>2.2.2.3</p>	<p>Assessment of short terms effects</p>	<p>Environmental Statement Air Quality Appendix 13.4.1 Air Quality Assessment Methodology: Paragraph 3.1.3 indicates that short term objectives have been considered through reference to annual values. As previously described this is only appropriate for road traffic sources.</p> <p>Updated position (Deadline 1): Defra LAQM Guidance relates to road traffic sources. The query relates to how short term emissions are considered where there are a number of different sources, e.g. aviation and heating plant associated with new hotels.</p>	<p>Based on the monitored and modelled annual mean concentrations, the impact of NO₂, PM₁₀ and PM_{2.5} are not considered to be at risk of exceeding the short term standards as outlined in Section 13.10 of the air quality assessment. Therefore, an assessment of short term effects was scoped out. This is in line with the guidance outlined within Defra LAQM Technical Guidance (2022).</p> <p>In addition, it should be noted that exposure to short term effects is influenced by a range of lifestyle and travel choices. Short term exposure would only be relevant at locations where people spend</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to</p>	<p>Under discussion</p>

		<p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>time equivalent to the short term target, for example for NO₂ the short term (1 hour mean) target is 200 µg/m³ not to be exceeded more than 18 times a year.</p> <p>As presented in the Air Quality Assessment, the two AQMAs within the 11 km by 10 km domain are designated for exceedances of the annual mean NO₂ air quality standard only. There were no exceedances of the 1-hour mean NO₂ standard of 200 µg/m³ or 24-hour mean PM₁₀ standard of 50 µg/m³ reported at any of the five continuous monitoring sites in operation within the 11 km by 10 km domain.</p> <p>Updated position (April 2024): The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p> <p>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].</p>	<p>Deadline 4 Submissions (Doc Ref. 10.38)</p>	
2.2.2.4	Monitoring sites	<p>TDC is concerned that excessive numbers of monitoring sites may have been excluded from model verification which could have improved the quality of the air quality verification and so the confidence in outputs.</p> <p>Updated position (Deadline 1): In relation to verification and the removal of so many sites it is unclear that agreement on this was achieved. Further discussion is proposed to understand this point.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>Full details of the model verification process are included in Section 3 within the ES Appendix 13.6.1. Table 3.2.2 provides a list of all sites excluded along with justification.</p> <p>The verification methodology was agreed with local councils at the modelling methodology workshop in November 2022. Model files and results were provided to the TWG via email 18th August 2023.</p> <p>Updated position (April 2024): The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p> <p>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].</p>	<p>ES Appendix 13.6.1 Air quality Data and Model Verification [APP-159]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion
2.2.2.5	Verification zones	<p>TDC disagrees that enough justification was provided for the selection of different verification zones and why the model would be expected to perform differently in each area. A sensitivity test is required to</p>	<p>Full details of the model verification process are included in Section 3 within the ES Appendix 13.6.1. Table 3.3.1 provides details on the verification zones used.</p>	<p>ES Appendix 13.6.1 Air quality Data and Model Verification [APP-159],</p>	Under discussion

		<p>demonstrate that the conclusions of the assessment would not change if a single verification factor were used.</p> <p>Updated position (Deadline 1): Further discussion is required on this point and the request for a sensitivity test examining the use of a single verification factor still remains.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>The verification methodology was agreed with local councils at the modelling methodology workshop in November 2022. Model files and results were provided to the TWG via email 18th August 2023.</p> <p>The process followed during the ES took into account feedback from the local authorities at the PEIR stage and following discussions on the agreed approach.</p> <p>Updated position (April 2024): The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p> <p>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].</p>	<p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	
2.2.2.6	Air Quality	<p>The Environmental Statement (ES) is entirely set out against air pollution levels which, although legal in the UK, were set in 2005. The latest guidance from the World Health Organisation (WHO) is for those levels to be reduced, sometimes as much as quartered. Reducing the current air pollution to these levels will already be a difficult task and the expansion of the airport would only worsen the problem.</p> <p>Updated position (Deadline 1): The assessment should be based on the latest science and understanding of potential air quality issues. The use of the current air quality standards clearly does not reflect our current understanding of potential health impacts as these lag behind our knowledge. This is evidenced by the recent agreement by the EU for new, more stringent standards, the WHO guidelines and new Air Quality Targets in the UK.</p> <p>Updated position (Deadline 5): No change in position.</p>	<p>The World Health Organisation (WHO) global air quality guidelines are not currently part of UK legislation or policy, so the thresholds used to assess the Project have followed those in national legislation. Until such thresholds are changed, which may or may not reflect the WHO Guidelines, then assessment is undertaken in accordance with current legislation which is consistent with policy standards. To determine the significance of air quality impacts the methodology used is detailed in ES Chapter 13: Air Quality, Section 13.5.</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>Updated position (April 2024): The Applicant would welcome an updated position or response from TDC against this SoCG item, or confirmation if this item can be marked as ‘agreed’ or ‘no longer pursuing’.</p>	<p>ES Chapter 13 Air Quality [APP-038]</p>	Under discussion
2.2.2.7	Air Quality	<p>The ES does not provide any assessment of Ultrafine Particulates (UFPs) although acknowledges that they can result in adverse health impacts. The Council accepts that a fully quantitative assessment cannot be carried out, but questions whether PM2.5 is a suitable proxy for UFPs. Using PM2.5 as a proxy relies on the assumption that the proportion of PM2.5 and UFPs remains the same in all scenarios. However, the proposal adds</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>Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]</p>	Under discussion

		<p>significant extra emissions from aircraft sources which have different emission characteristics compared with road vehicles and are a known significant source of UFPs. It would therefore be reasonable to assume that the proportion of UFPs in PM2.5 will increase with the proposal. Evidence should be provided that PM2.5 is a suitable proxy for UFPs where additional emissions from aviation are being added.</p> <p>Updated position (Deadline 1): This response does not address the request for involvement of GAL in undertaking or funding local ultrafine particulates monitoring.</p> <p>It also does not address the request that a plan for managing and aiming to reduce UFP emissions is prepared by GAL.</p> <p>Updated position (Deadline 5): 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.</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>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 ES Appendix Carbon Action Plan (APP-091) 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>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>Updated Position (April 2024): The Applicant has set out provisions in relation to UFPs at Schedule 1, Draft Section 106 Agreement [REP2-004].</p> <p>Updated position (Deadline 5): The Applicant will respond at Deadline 6 to the JLAs' review submitted at Deadline 4 [REP4-053]</p>	<p>Schedule 1 of the Draft Section 106 Agreement [REP2-004]</p>	
2.2.2.8	Air Quality	TDC does not accept that the human health effects have been correctly assessed in the construction impact assessment. The assessment has used the IAQM guidance but the standards for particulate matter are now	The effects from demolition and construction of the Project have been assessed using the qualitative approach described in the Institute of Air Quality Management (IAQM) dust guidance. The	ES Chapter 13 Air Quality [APP-038]	Under discussion

		<p>much more stringent than those assumed in this document. As the particulate matter standards are more stringent, the sensitivity of the area can now longer be properly defined by Table 2.1.3 of Appendix 13.4.1. The conclusions in ES para 13.10.15 are not appropriate. The definitions of receptor sensitivity requires revision to reflect the new standards and the impact assessment updated.</p> <p>Updated position (Deadline 1): The assessment should be based on our current best understanding of the human health impacts from exposure to particulate matter. It is clear from the WHO air quality guidelines document that health impacts exist at levels below the current UK air quality standards and this should be acknowledged and assessed within the ES.</p> <p>Updated position (Deadline 5): No change in position.</p>	<p>assessment of construction has been based on the best estimate of emissions and conservative assumptions where applicable.</p> <p>The sensitivity of the area is defined by annual mean PM₁₀ concentrations and is in line with the approach set out in Table 3 of the latest published (2014) IAQM dust guidance.</p> <p>Updated Position (April 2024): The Applicant has set out a response on the WHO guidelines in stakeholder position 2.2.2.6. The Applicant would welcome an updated position or response from TDC against this SoCG item, or confirmation if this item can be marked as 'agreed' or 'no longer pursuing'.</p>	<p>ES Appendix 13.4.1: Air Quality Assessment Methodology [APP-158]</p>	
2.2.2.9	Air Quality	<p>The cumulative impacts of parallel ongoing of construction activities and operational activities and their related emission ceiling calculations do not seem to have been assessed. The scenarios provided in the ES do not provide a realistic worst-case assessment.</p> <p>Updated position (Deadline 1): It is welcomed that GAL propose to provide further information at the next air quality TWG. This matter will remain under discussion until this TWG has been held.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>Traffic modelling has been undertaken for two construction scenarios, airfield construction and surface access (highways) construction. Further detail is contained in the Transport Assessment. The construction scenarios assume the peak construction traffic flows applied to the first year of airfield (2024) and surface access (2029) construction which is a conservative assumption since emissions and background concentrations are anticipated to improve in future years.</p> <p>As set out in paragraph 13.5.53 of ES Chapter 13: Air Quality, the 2029 surface access construction scenario represents years 2029-2032, during which there will be an overlap with the operation of the Project. The 2029 surface access construction scenario is a combined scenario considering the contribution from both construction and operational traffic over this period to represent a realistic worst case assessment.</p> <p>GAL proposes to set out the model scenarios and provide that summary at TWGs to be arranged for Q1 2024.</p> <p>Updated position (April 2024): GAL has set out the model scenarios within Appendix D of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050]. The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p>	<p>ES Report 7.4 Transport Assessment [AS-079]</p> <p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix D of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion

			<p>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].</p>		
2.2.2.10	Air Quality	<p>Air Quality should be modelled to 2047.</p> <p>Updated position (Deadline 1): It is noted that air quality should improve beyond 2038. However, it is our understanding that the ANPS requires a full assessment of the airport at full capacity.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p>	<p>An assessment of 2047 has been included in the ES Chapter 13: Air Quality with an emissions inventory (Table 13.10.8), including aircraft and road vehicle emissions. The air quality assessment concludes that no significant effects for air quality are anticipated for 2047. Between 2038 and 2047 a number of predicted improvements to air quality would be expected to occur as a result of national policies to reduce emissions and also as a result of the project.</p> <p>Background concentrations are expected to reduce between 2038 and 2047 and vehicle emissions would continue to reduce. Road traffic is the main source of emissions likely to result in an impact from the project due to the proximity of road sources to sensitive receptors, compared with aircraft emissions. Therefore, despite the uncertainty of predicting emissions for a future year of 2047, it has been concluded that the 2047 future year is not at risk of resulting in a significant impact to air quality.</p> <p>Updated Position (April 2024): The Applicant has provided further information regarding the 2047 assessment at Section 3 of Appendix D of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050].</p> <p>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].</p>	<p>ES Chapter 13 Air Quality [APP-038].</p> <p>Appendix D and Appendix E of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion
Assessment					
2.2.3.1	Air Quality	<p>TDC believes that the air quality enjoyed by its residents, businesses and natural environment will be significantly worsened by the proposal, including the impacts of construction and demolition activities leading to dust generation and emissions from construction vehicles, and the impacts of additional flights and traffic generate by the increase in airport users and suppliers.</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</p>	<p>ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 13.8.1 Air Quality Construction</p>	Under discussion

		<p>Updated position (Deadline 1): In order to address Council concerns it is proposed that an outline Dust Management Plan (DMP) is prepared during the examination. It is also requested that further details are provided on the proposed controls and air quality monitoring for construction traffic and construction worker traffic (within the oCTMP and CWTP) and lastly that an air quality action plan is developed to control air quality impacts in the operational. GAL committed at the December 2023 Air Quality TWG to provide an AQAP.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. The Joint Local Authorities have also 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.</p>	<p>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>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>Updated Position (April 2024): The Draft Construction Dust Management Plan (CDMP) has been shared with local authorities for comment on 26th 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 on the document in due course.</p> <p>The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Deadline 2 Submission – 10.11 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.</p> <p>Section 2 of the AQAP sets out measures and monitoring commitments related to the construction phase, controlled by the Code of Construction Practice (CoCP) [REP1-021] secured by Requirement 7 of the Draft DCO. The current monitoring arrangements will allow the collection of air quality concentrations in the vicinity of the airport to support the understanding of air pollution</p>	<p>Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2 Code of Construction Practice [REP-021]</p> <p>ES Appendix 5.4.1 Surface Access Commitments [APP-090]</p> <p>ES Appendix 5.4.2 Carbon Action Plan [APP-091]</p> <p>Schedule 1 and Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant's Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	
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			<p>effects in the construction period. The data will be used to compare against national standards.</p> <p>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].</p>		
2.2.3.2	Air Quality	<p>More information is needed on how sensitive predictions are to modal shift objectives not being achieved, to understand how much air quality may deteriorate if measures are delayed or unsuccessful.</p> <p>Updated position (Deadline 1): The applicant response has not provided sensitivity testing in relation to air quality. Therefore, uncertainty remains for air quality as to how sensitive predictions presented are to the success of mode shift. Additionally, whilst there are provisions to monitor mode shift it is unclear what actions would be taken if mode shift was not identified and what air quality triggers would be used.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>The mode share commitments within the Surface Access Commitments (SACs) document represent the position GAL is confident it can achieve, based on the modelling of mode choice and transport network operation. Further details are provided in Chapter 7 of the Transport Assessment. The range of interventions to improve sustainable travel has been tested to inform the mode share commitments reported in the Application. The SAC also includes a section on GAL's further aspirations, which includes more ambitious mode share targets which it will be working towards, but it has set the committed mode shares explicitly to ensure that the core surface access outcomes set out in Environmental Statement are delivered. The SAC contains measures to monitor and ensure that the mode commitments are met.</p> <p>Conservative assumptions have also been built into the air quality assessment to reduce uncertainty in any future scenario such as background values being frozen to 2030 and no improvements in aircraft emissions being accounted for in the air quality modelling.</p> <p>The assessment of air quality is measured against the relevant air quality standards. The draft Section 106 agreement includes commitments to monitoring of air quality at current and proposed monitoring sites against relevant air quality standards. Results will be reported to local authorities.</p> <p>Updated Position (April 2024): A sensitivity test with the conservative assumption that there are no improvements in emissions beyond 2030 has been provided a Deadline 1, within Appendix F of the Supporting Air Quality Technical Notes to the SoCGs (Doc Ref. 10.4). The Applicant notes that the JLAs have provided a submission on air quality at Deadline 3. The Applicant will review this submission and respond accordingly.</p>	<p>ES Chapter 7.4 Transport Assessment [AS-079]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p> <p>ES Chapter 13 Air Quality [APP-038]</p> <p>Appendix F of the Supporting Air Quality Technical Notes to the SoCGs [REP1-050].</p> <p>Schedule 1 and Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion

			<p>The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Deadline 2 Submission – 10.11 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.</p> <p>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].</p>		
Mitigation and Compensation					
2.2.4.1	Ultra-Fine Particles Assessment	<p>An assessment of UFPs has not been included, while the council acknowledges a full quantitative assessment cannot be undertaken, TDC has concerns that the suggestion that PM2.5 is a suitable proxy is incorrect. The proposal adds new emissions from aviation. The ES acknowledges that UFPs could have adverse health impacts but no mitigation is proposed to minimise emissions.</p> <p>Updated position (Deadline 1): This response does not address the request for involvement of GAL in undertaking or funding local ultrafine particulates monitoring.</p> <p>It also does not address the request that a plan for managing and aiming to reduce UFP emissions is prepared by GAL.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. The Joint Local Authorities have also 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.</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>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 ES Appendix 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</p>	<p>Section 18.8 of ES Chapter 18: Health and Wellbeing [APP-043]</p> <p>Schedule 1 of the Draft Section 106 Agreement [REP2-004]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion

			<p>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>Updated Position (April 2024): The Applicant has set out provisions in relation to UFPs at Schedule 1, Deadline 2 Submission – 10.11 Draft Section 106 Agreement [REP2-004].</p> <p>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].</p>		
2.2.4.2	Mitigation and monitoring	<p>Construction monitoring should form part of the DCO requirements. There is insufficient information provided explaining 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.</p> <p>Updated position (Deadline 1): Construction phase monitoring would be addressed within a DMP. It is understood that a final DMP cannot yet be provided, but an outline or draft DMP can be prepared. This is still requested. Further details on monitoring can also be added to the oCTMP and CWTP to address concerns associated with road traffic during the construction phase.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters.</p> <p>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.</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>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 ES Appendix Carbon Action Plan (APP-091) sets out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources. Commitments on surface access</p>	<p>Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p> <p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090]</p>	Under discussion

		<p>Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>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>Updated Position (April 2024): The Draft Construction Management Plan (CDMP) has been shared with local authorities for comment on 26th 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.</p> <p>The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Draft Section 106 Agreement [REP2-004]. Section 2 of the AQAP sets out measures and monitoring commitments related to the construction phase, controlled by the Code of Construction Practice (CoCP) [REP1-021] secured by Requirement 7 of the Draft DCO. The current monitoring arrangements will allow the collection of air quality concentrations in the vicinity of the airport to support the understanding of air pollution effects in the construction period. The data will be used to compare against national standards.</p> <p>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].</p>	<p>Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	
2.2.4.3	Monitoring system for Construction Traffic	<p>TDC disagrees that enough details is provided on the restrictions and monitoring of construction traffic utilising routes through the J10 M23. Reference is made to a monitoring system that ‘it is envisaged’ will be developed in the full CTMP. Further details are requested during the examination.</p> <p>Updated position (Deadline 1): Concerning the oCTMP and CWTP it is not clear what air quality monitoring and air quality triggers will be used to identify where air quality is worse than predicted in the ES and what actions would then be taken. Further details are required during the examination phase.</p> <p>Updated position (Deadline 5):</p>	<p>The impact from construction traffic due to movement of construction materials will be managed in accordance with a Construction Traffic Management Plan (CTMP). The impact of construction workforce travelling to and from the Airport will be managed in accordance with a Construction Workforce Travel Plan (CWTP), both of which will be developed by GAL and its contractors during detailed design / pre-construction stage in accordance with the Outline Construction Traffic Management Plan.</p> <p>The detailed Construction Traffic Management Plan (CTMP) and Construction Workforce Travel Plan (CWTP) will be developed during detailed design and pre-construction stage in consultation with the relevant highway authority and the National Highways.</p>	<p>ES Appendix 5.3.2 Annex 3 Outline Construction Traffic Management Plan [APP-085]</p> <p>ES Appendix 5.3.2 Annex 2 Outline Construction Workforce Travel Plan [APP-084]</p>	Under discussion

		<p>Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>Updated Position (April 2024): The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Draft Section 106 Agreement [REP2-004]. Section 2 of the AQAP sets out measures and monitoring commitments related to the construction phase, controlled by the Code of Construction Practice (CoCP) [REP1-021] secured by Requirement 7 of the Draft DCO. The current monitoring arrangements will allow the collection of air quality concentrations in the vicinity of the airport to support the understanding of air pollution effects in the construction period. The data will be used to compare against national standards.</p> <p>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].</p>	<p>Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	
2.2.4.4	Monitoring framework - Construction	<p>The Monitoring Framework for the Construction Workforce Travel Plan is unclear (Document name: Environmental Statement Appendix 5.3.2 Code of Construction Practice, Annex 2 Outline Construction Workforce Travel Plan).</p> <p>Updated position (Deadline 1): Concerning the oCTMP and CWTP it is not clear what air quality monitoring and air quality triggers will be used to identify where air quality is worse than predicted in the ES and what actions would then be taken. Further details are required during the examination phase.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>The impact from construction traffic due to movement of construction materials will be managed in accordance with a Construction Traffic Management Plan (CTMP). The impact of construction workforce travelling to and from the Airport will be managed in accordance with a Construction Workforce Travel Plan (CWTP), both of which will be developed by GAL and its contractors during detailed design / pre-construction stage in accordance with the Outline Construction Traffic Management Plan.</p> <p>The detailed Construction Traffic Management Plan (CTMP) and Construction Workforce Travel Plan (CWTP) will be developed during detailed design and pre-construction stage in consultation with the relevant highway authority and the National Highways.</p> <p>Updated Position (April 2024): The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Draft Section 106 Agreement [REP2-004]. Section 2 of the AQAP sets out measures and monitoring commitments related to the construction phase, controlled by the Code of Construction Practice (CoCP) [REP1-021] secured by Requirement 7 of the Draft DCO. The current monitoring arrangements will allow the collection of air quality concentrations in the vicinity of the airport to support the understanding of air pollution effects in the construction period. The data will be used to compare against national standards.</p>	<p>ES Appendix 5.3.2 Annex 3 Outline Construction Traffic Management Plan [APP-085]</p> <p>ES Appendix 5.3.2 Annex 2 Outline Construction Workforce Travel Plan [APP-084]</p> <p>Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p> <p>Appendix A: Response to West</p>	Under discussion

			<p>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].</p>	<p>Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	
2.2.4.5	Air Quality	<p>Information also needs to be provided on how the routes for construction traffic will be enforced, without such controls, the construction impacts on some road links could be higher than those predicted.</p> <p>Updated position (Deadline 1): Concerning the oCTMP it is not clear what air quality monitoring and air quality triggers will be used to identify where air quality is worse than predicted in the ES and what actions would then be taken. Further details are required during the examination phase.</p> <p>Updated position (Deadline 5): Gatwick Airport Limited (GAL) comments in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>Section 6 of the oCTMP sets out the construction vehicle routes and access.</p> <p>The detailed Construction Traffic Management Plan (CTMP) and Construction Workforce Travel Plan (CWTP) will be developed during detailed design and pre-construction stage in consultation with the relevant highway authority and the National Highways.</p> <p>Updated Position (April 2024): The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Draft Section 106 Agreement [REP2-004]. Section 2 of the AQAP sets out measures and monitoring commitments related to the construction phase, controlled by the Code of Construction Practice (CoCP) [REP1-021] secured by Requirement 7 of the Draft DCO. The current monitoring arrangements will allow the collection of air quality concentrations in the vicinity of the airport to support the understanding of air pollution effects in the construction period. The data will be used to compare against national standards.</p> <p>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].</p>	<p>ES Appendix 5.3.2 Annex 3 Outline Construction Traffic Management Plan [APP-085]</p> <p>Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p> <p>Appendix A: Response to West Sussex Joint Local Authorities – Air Quality to The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)</p>	Under discussion
2.2.4.6	Air Quality	<p>An Air Quality Action Plan detailing monitoring, evaluation and enforcement is needed, alongside committed funding for monitoring to 2047. The proposed air quality action plan could be informed by local monetisation of air quality impacts.</p> <p>Updated position (Deadline 1):</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</p>	<p>Section 13.9 of ES Chapter 13 Air Quality [APP-038]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p>	Under discussion

		<p>This response does not align with the commitment provided by GAL in the December 2023 Air Quality TWG to provide an AQAP. Please can GAL confirm this response is out of date.</p> <p>Updated position (Deadline 5): 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.</p>	<p>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>Updated Position (April 2024): The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Deadline 2 Submission – 10.11 Draft Section 106 Agreement [REP2-004]. Section 4 sets out information in relation to air quality monitoring, including commitments which are secured under the Schedule 1 of the s106 Agreement.</p> <p>Updated position (Deadline 5): The Applicant will respond at Deadline 6 to the JLAs' review submitted at Deadline 4 [REP4-053].</p>	<p>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</p> <p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.4.1: Surface Access Commitments [APP-090].</p> <p>Schedule 1 and Appendix 5 of the Draft Section 106 Agreement [REP2-004]</p>	
2.2.4.7	Air Quality	<p>No Dust Management Plan (DMP) is provided. The number of automatic monitors to be provided during construction is also not specified.</p> <p>Updated position (Deadline 1): 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>Updated position (Deadline 5): 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.</p> <p>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.</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>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>Updated position (Deadline 1): A note explaining the draft Outline CDMP will be shared with the LAs for comment by 26th March (to align with Deadline 2), with the intention of submitting the note into</p>	<p>ES Appendix 13.8.1: Air Quality Construction Period Mitigation [APP-161]</p> <p>ES Appendix 5.3.2: Code of Construction Practice [REP1-021]</p>	Under discussion

			<p>the Examination in due course taking account of any feedback received.</p> <p><u>Updated Position (April 2024): The Draft Construction Management Plan (CDMP) has been shared with local authorities for comment on 26th 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><u>Updated position (Deadline 5): The Applicant will respond at Deadline 6 to the JLAs' review submitted at Deadline 4 [REP4-053].</u></p>		
Other					
2.2.5.1	Petrol and diesel car ban	The government has announced on 20/09/2023 that it would delay the ban on sales of new diesel and petrol cars from 2030 to 2035. It would be useful to understand how this had been factored into the emissions projections and whether it would create any new impact or risen any existing impacts.	<p>A conservative approach has been taken in the air quality assessment which would outweigh the changes proposed in the recent government announcement. In particular for the future backgrounds, as Defra forecasts are provided only to 2030, so for all assessment years (2032, 2038 and 2047) no improvement beyond 2030 has been assumed.</p> <p>In addition the EFTv11 is based on the core scenarios provided by the National Road Traffic Projections 2022. It is only the three ambitious EV uptake scenarios (Technology, Mode-balanced Decarbonisation and Vehicle-led Decarbonisation) which “assume delivery of the ambition to phase out petrol and diesel cars and van sales by 2035 and the implementation of vehicle decarbonisation policies such as zero emission vehicle mandates” (section 1.14). Defra’s EFT uses emission factors which are based on the core scenario of National Traffic Projections which does not include ambitious electric vehicle uptake. Therefore, there would be limited or no impact on the emission factors used at the time of the assessment.</p> <p>Lastly, according to the National Road Traffic Projections 2022, section 4.5 states that “Between 2025 and 2050 NOx are projected to reduce by 65%, driven by the uptake of Euro 6 engines”. As a NOx reduction is already expected, a five year delay in the phasing out of the sale of new petrol and diesel cars and vans would have a limited effect on the assessment due to the savings expected to occur during that period.</p>	ES Chapter 13 Air Quality [APP-038]	Agreed
2.2.5.2	Air Quality	The likely impact of FASI-South on air pollution should be considered.	The FASI-South plans would be assessed as part of their own work. The Project would not be affected by these plans as the changes to airspace occur at altitudes above which there would be an affect on local air quality.		Agreed

			In accordance with International Civil Aviation Organization (ICAO) and Department for Transport guidance, emissions above 305m (1,000ft) will not give rise to a significant impact on local air quality and this has been demonstrated from the project modelling.		
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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	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
2.7.1.1	Draft DCO	<p>The draft DCO does not contain adequate provisions for the control of air noise given the magnitude of effect.</p> <p>A different approach to the management and control of noise is sought to that proposed by Gatwick whereby local authorities have wide ranging statutory powers and are fully funded by the applicant for all the work they undertake.</p> <p>Updated Position (Deadline 5): At Deadline 4, the Joint Local Authorities submitted their Introduction to a proposal for an Environmentally Managed Growth Framework [REP4-050] (“the Introduction”), which explains that the DCO requirements which include controls related to environmental effects provide the Applicant with too much flexibility. The Introduction states the Joint Local Authorities consider a bespoke Environmentally Managed Growth Framework should apply to the proposed development and that a worked-up Framework will be submitted to the Examination as soon as possible. The Framework will apply to the air noise envelope (requirements 15 and 16). (It will also apply to requirements 19 (airport operations), 20 (surface access), and 21 (carbon action plan)).</p>	<p>We refer to the responses provided in relation to noise and vibration below in Table 2.16 in relation to the noise envelope and the noise insulation scheme. The Applicant does not agree with the comment. It is considered appropriate mitigation for air noise which avoid significant adverse effects on health and quality of life are to be secured, and the Applicant has also to committed which are reasonable and practicable to mitigate and minimise adverse impacts on health and quality of life from air noise. In so doing, the Applicant considers that it has put forward a set of mitigation measures in relation to air noise which ensure policy compliance. The manner in which those mitigation measures are to be administered, including the noise envelope by the CAA in an independent capacity and with relevant expertise, is entirely appropriate.</p> <p>Updated position (Deadline 5): The Applicant has provided a response to the Introduction to a proposal for an Environmentally Managed Growth Framework at Appendix B of The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38).</p>	Appendix B of The Applicant’s Response to Deadline 4 Submissions (Doc Ref. 10.38)	Under discussion
<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
<i>There are no issues relating to Ecology and Nature Conservation 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. 10.1.18).</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
<i>There are no issues relating to Greenhouse Gases within this Statement of Common Ground.</i>					

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
<i>There are no issues relating to Historic Environment in 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
<i>There are no issues relating to Landscape, Townscape and Visual in this Statement of Common Ground.</i>					

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
Baseline					
2.16.1.1	Threshold and scope of LOAELs and SOAELs for consideration of air noise	<p>In relation to air noise, the ES only considers the Leq metric for LOAELs and SOAELs. This is too narrow and other metrics should be applied to the decision processes within the project to inform impact and proposals for mitigation. The consideration only of the Leq metric does not represent all the effects of air noise across the district.</p> <p>Updated position (Deadline 5): TDC maintains their position that likely significant effects are not appropriately identified by the LAeq,T metric; and supplementary metrics should be used to identify likely significant effects.</p>	<p><u>GAL engaged with the LPAs before and after the PEIR to discuss and explain the scenarios and noise metrics to be modelled and reported in the ES. These comprise:</u></p> <ul style="list-style-type: none"> <u>8 metrics - Leq 16 hr, Leq 8 hr night, N65 day, N60 night, Lden, LNight, Lmax and overflights;</u> <u>5 assessment years – 2019, 2029, 2032, 2038 and 2047</u> <u>2 Fleet transition scenarios, the Central Case and Slower Transition Case.</u> <p><u>These are presented in 71 figures in the ES relating to air noise impacts with the data tabulated in 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.</u></p>		<u>Not agreed</u>
2.16.1.2	Modelling of air noise primary and secondary metrics.	<p>The noise model used in the assessment cannot currently be validated by anyone else other than the applicant. Additional scenario testing is considered necessary in the models.</p> <p>Updated position (Deadline 5): ERCD Report 2002 does not contain the sufficient information on validation such measured as SEL and LAmax data for individual aircraft variants that were modelled and the difference between predictions and measurements. The information is important to understand the aircraft noise contours has not been provided by the Applicant and underpins the air noise assessment. The information was initially requested after the TDC review of the PEIR and the Applicant has not fulfilled the request.</p>	<p><u>The air noise model has not been validated by the Applicant, it has been validated by the CAA every year. The CAA's Environmental Research and Consultancy Department (ERCD) has been producing noise contours for Gatwick Airport using the ANCON model since 1988 including annual contours every year. Up until 2015 the contours were produced for the DfT, and since then they have been carried out for GAL. ERCD has a team who maintain the model and calibrate it for Gatwick Airport using thousands of data points every year. ANCON is used on other UK airports as well as for international studies, and is considered the most accurate tool available to model noise from Gatwick Airport.</u></p> <p><u>We refer back to the various reports on the ANCON model including the following extracts from ANCON model and referring to ERCD Report 2002: Noise Exposure Contour for Gatwick Airport 2019 referenced in ES Appendix 14.9.2:</u></p> <p><u>2.1 Noise contours were calculated with the UK civil aircraft noise model ANCON (version 2.4), which is developed and maintained by ERCD on behalf of the DfT. A technical description of ANCON is provided in R&D Report 9842 (Ref 5). The ANCON model is also</u></p>		<u>Under discussion</u>

			<p>used for the production of annual contours for Heathrow and Stansted airports, and a number of other UK airports.</p> <p>2.2 ANCON is fully compliant with the latest European guidance on noise modelling, ECAC.CEAC Doc 29 (Fourth edition), published in December 2016 (Ref 6). This guidance document represents internationally agreed best practice as implemented in modern aircraft noise models. The fourth edition introduced some minor changes to the modelling of start-of-roll noise, which were incorporated in the 2017 software update to ANCON (version 2.4).</p>		
Mitigation					
2.16.1.3	For air noise, the assessment of significance of effects – the disregard of total effects of noise on health and annoyance by referring only to marginal impacts of the NRP over a rapidly increasing baseline.	<p>The Environmental Statement takes into consideration only the marginal increase in noise as a result of the additional capacity of the NRP. In that way it disregards the existing health effects of the otherwise uncontrolled and unmitigated growth. For example, awakening data for the NRP part of capacity is below the Heathrow SOAEL of one additional awakening. However, this disregards the awakenings that occur now and the increase in awakenings that will occur with purported increase in baseline growth without the northern runway.</p> <p>Updated position (Deadline 5): Can the Applicant confirm if all properties where one awakening would occur will receive noise insulation?</p>	<p>With regards to noise, the impacts of the airport will reduce in the future baseline despite the small growth in air traffic predicted, as reported in detail in the air noise assessment in ES Chapter 14: Noise and Vibration [APP-039].</p> <p>With regards awakenings, paragraph 7.4.2 of ES Appendix 14.9.2 Air Noise Modelling [APP-172] provides estimates of awakenings in the future baseline as well as with the Project as follows:</p> <p>In the study area of 34,000 people, as described above each person is likely to experience about 20 awakenings without considering the effect of aircraft noise, implying 680,000 awakenings each night.</p> <p>The numbers of awakenings estimated due to aircraft noise are as follows:</p> <ul style="list-style-type: none"> • 2019 base 32,317 • 2032 Central Case base 26,508 • 2032 Central Case with Project 29,560 • 2032 [Slower Fleet Transition] STF Case base 29,061 • 2032 [Slower Fleet Transition] STF Case with Project 32,843 		Under discussion
2.16.1.4	Limited assessment of changes in sound levels for air noise	<p>Changes in noise levels that lie exclusively within LOAEL or exclusively within SOAEL a have not been comprehensively assessed. Additional clarification is required.</p> <p>Updated position (Deadline 5): Information is not clearly provided. Table 14.9.10 and Table 14.9.11 should be updated to show population exposed to changes in noise between LOAEL and SOAEL and above SOAEL.</p>	<p>For air noise, Tables 14.9.10 and 14.9.11 of ES Chapter 14 give the populations predicted to have various changes in noise from across 9 ranges. Only noise levels above LOAEL are reported. Paragraphs 14.9.102 to 14.9.104 describe where these significant changes are expected. 40 have changes above 3dB all above SOAEL. 40 have changes of 1dB above SOAEL. These are the 80 properties significantly affected by the Project.</p>		Under discussion
2.16.1.5	Noise Insulation Scheme	The proposal for the noise insulation scheme is not timely nor adequate to deal with either noise and the problem of overheating created as a result	The Applicant has provided further details of the provision of noise insulation including the specification of acoustic ventilators to		

		<p>of the noise mitigation and ongoing costs incurred as a result of works to individual properties.</p> <p><u>Updated position (Deadline 5): TDC maintain their position on this matter</u></p>	<p><u>reduce overheating and details of the timing of the scheme in ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-032]</u>.</p>		
2.16.1.6	Noise Envelope	<p>We do not consider the noise envelope is fit for purpose for multiple reasons.</p> <p>The noise envelope needs to be redesigned from first principles to provide a responsive, preventative, self regulating mechanism that incentivises the use of quieter fleet and shares the benefit of technological improvement with the local community through a range of operational and outcome-based measures. It needs to be governed by a steering committee that includes local authorities and provide them with a balanced range of intervention and enforcement tools</p> <p><u>Updated position (Deadline 5): TDC maintains their position on this matter</u></p>	<p><u>The Applicant has consulted with Tandridge District Council before the PEIR in 2019 and the Noise Envelope Group widely on its proposals for the Noise Envelope, as described in the ES Appendix 14.9.8 Noise Envelope Group Output Report [APP-178] and ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [APP-179]</u></p> <p><u>The approach to the noise envelope is considered to be entirely appropriate and there is no intention for any re-design of this to be undertaken.</u></p> <p><u>As described in ES Appendix 14.9.7: The Noise Envelope, each year an Annual Monitoring and Forecasting Report will be required to not only report monitoring of last year's performance against the Noise Envelope limits but to forecast compliance 5 years ahead, so that noise control measures can be planned and implemented in advance. The Noise Envelope, in Section 7.3, puts restrictions of further capacity declaration in the event that an exceedance of the noise envelope is forecast. The approach ensures action is taken in a timely manner to require compliance, with the sufficient threat of capacity restrictions if a breach is not remedied through the action plan measures within a reasonable time period. This strikes an appropriate fair balance, for the in the unlikely event of actual breach taking into account the purposefully forward-looking nature of the annual monitoring and forecasting approach.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>	<p><u>ES Appendix 14.9.7: The Noise Envelope [APP-177]</u></p>	<p><u>Under discussion</u></p>

			<p>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 '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'.</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 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>The Applicant has also provided further explanation of the analysis of sharing the benefits in response to Examining Authority's question NV.1.9 in The Applicant's Response to ExQ1 - Noise and Vibration (Doc Ref 10.16) 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>		
2.16.1.7	Future research	TDC consider that there is insufficient validation of the mitigation; and research to improve understanding of, for example, the effectiveness of the mitigation, the reliability and resolution of the noise contours, local attitudes to noise and cross correlation to the noise contours.	GAL supports research into noise management in a number of areas and will continue to do so, as summarised in the Noise Action Plan secured via other legislative means. GAL commissions ERCD to carry out noise modelling including calibration every year. The		Agreed Agreed

Updated position (Deadline 5): Information is accepted

Noise Envelope commits to a review of the data used to do this. GAL funds the Noise Management Board whose workplan covers a wide range of new ways to address noise impacts prioritised through community engagement. The Noise Action Plan includes a requirement to review the Noise Insulation Scheme which was last reviewed in 2019 with local authority input. The outcomes of that review have been taken into account when developing the proposed Noise Insulation Scheme for the Project.

Section 7.4 of **ES Appendix 14.9.7: The Noise Envelope [APP-177]** requires the Applicant to commission independent experts to review the accuracy of the noise monitoring data used for the noise contour modelling.

The Civil Aviation Authority (CAA) has been tasked with developing the new Aviation Noise Attitudes Survey (ANAS) as part of their Noise Advisory Functions. ANAS is expected to build on lessons learnt from SONA and previous preparatory work undertaken by NatCen on behalf of the Independent Commission on Civil Aviation Noise (ICCAN) in 2021. The focus of the study is to gather data about experience of exposure to day-time aviation noise. The survey work is being carried out in two waves. Wave 1 is complete and surveyed just over 30,000 people. The ANAS survey is large enough to be both national and individual airports including Gatwick.

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	Interpretation of Aviation Policy and Local Planning Policy	TDC disagrees with the way aviation noise policy is being interpreted and the consequential effects these have on the proposals. TDC also disagrees that compliance with Local Planning Policy has been demonstrated due to a lack of detail in the proposal.	The Applicant has set out its position on aviation noise law and policy at Issue Specific Hearing 5, contained in The Applicant's Written Summary of Oral Submissions at ISH5 [REP1-060]. GAL has also submitted a series of Local Planning Policy Compliance Tables at Deadline 3. Annex D relates to TDC's local planning policy. Further detail is requested from TDC on what element of the Applicant's response is in disagreement.	The Applicant's Written Summary of Oral Submissions at ISH5 [REP1-060]	Under discussion

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 2.20 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
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
2.19.3.1	Overstatement of wider economic benefits of the proposal	TDC believes the level of increase capacity attainable from the NRP presented by GAL is overstated, leading to an overstatement of demand forecasts. TDC contests that the methodology used to derive these numbers is best practice or robust. As a result, the wider economics benefits of the proposal have been overstated and it is unclear that there is an economic case for the expansion of Gatwick.	The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme. While this type of assessment is not required for private-sector schemes, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV). <u>Updated position (April 2024):</u> <u>Following further TWGs, the Applicant is providing a further explanatory note.</u>	Needs Case Appendix 1 - National Economic Impact Assessment [APP-251]. <u>The Applicant's Response to the ExA's Written Questions (ExQ1) – Socio-Economic Effects</u> [REP3-103] – SE.1.20.	Under discussion
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.					

2.20. Traffic and Transport

2.20.1 Table 2.20 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
	On behalf of TDC highway matters are covered in the SCC SoCG				

~~There are no issues relating to Traffic and Transport within this Statement of Common Ground.~~

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
<i>There are no issues relating to Water Environment within this Statement of Common Ground.</i>					

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 Tandridge 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 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