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Examination Reference No: TR020005

Interested Party URN: 20044578

15 July 2024

FAO Kevin Gleeson National Infrastructure Planning Temple Quay House 2 The Square Bristol BS1 6PN

By online submission

### **Deadline 7 Submission**

Dear Inspector,

In preparing its response for Deadline 7 (D7) (15 July 2024), Mole Valley District Council ("MVDC", "the Council") has continued to work with the wider joint authorities across Surrey and West Sussex to explore shared impacts, challenges and resolutions where they arise. As such, the comments and considerations for the Council are set out both below and through other relevant and joint submissions where it is beneficial to do so. This includes:

- I. Joint Surrey Council's (JSC) Deadline 7 Response: Submitted by Surrey County Council on behalf of the JSC's<sup>1</sup>.
- II. Joint Local Authorities Response to the Applicants Deadline 6 Submissions: Submitted by Crawley BC and West Sussex, on the behalf of 10 Joint Local Authorities<sup>2</sup>.
- III. Traffic and Transport: The Council has continued to work closely with Surrey County Council as the Highways Authority and supports the comments made across the relevant Deadline 7 submissions, including through the Joint Surrey Council's Response, and the Joint Legal Partnership Comments on the Applicant's Response to ExA Written Questions (ExQ2). Traffic and transport comments are not duplicated here.

<sup>&</sup>lt;sup>1</sup> Surrey County Council (Ref. 20044665), Mole Valley District Council (Ref: 20044578), Reigate and Banstead Borough Council (Ref. 20044474) and Tandridge District Council (Ref: GATW-S57419)

<sup>&</sup>lt;sup>2</sup>Surrey County Council (SCC), West Sussex County Council (WSCC), Kent County Council (KCC), East Sussex County Council (ESCC), Mole Valley District Council (MVDC), Reigate and Banstead Borough Council (RBBC), Tandridge District Council (TDC), Horsham District Council (HDC), Mid Sussex District Council (MSDC), Crawley Borough Council (CBC).



#### Joint Authorities Legal Partnership Response to ExA Written Questions (ExQ2)

The Council has had sight of and is aware of the comments set out in The Legal Partnership Authorities' responses to the ExA Written Questions (ExQ2), which are being submitted by West Sussex County Council on behalf of the Partnership.

As MVDC is not part of the legal partnership on this element of the commission, the Council is making comments independently of the partnership where it is necessary to do (Appendix 1). Due to the overlap with technical consultants used by both Mole Valley and the JLP authorities, there is some necessary duplication (Appendix 2) with that of the JLP submission and is done to ensure the view of MVDC is comprehensively set out.

# Joint Authorities Legal Partnership- Response To Applicant's Draft dDCO Section 106 Agreement [REP6-063] And Explanatory Memorandum [REP6-096]

This submission provides a brief response to the Draft dDCO Section 106 Agreement [REP6-063] and Draft Section 106 Agreement – Explanatory Memorandum [REP6-063] submitted by the Applicant at Deadline 6.

Mole Valley District Council is part of the Legal Partnership Authorities for aspects of the examination relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities. As such, this submission is also made on behalf of the Council.

I hope this is of use to you.

**Yours Sincerely** 

Marie Killip Principal Planning Policy Officer



## **Appendix 1: MVDC Independent Comments on Examining Authorities Written Questions (ExAQ2)**

ExA Q2	Question to	Question	MVDC Independent Response
COMPULS	ORY ACQUISIT	ION AND TEMPORARY POSSESSION	
CA.2.9	Applicant Local Authorities	Management of Replacement Open Space Please can all parties provide an up-to- date position in respect of the management of all replacement open space (ROS).  Can the Applicant confirm if Horley Town Council are to be involved in the management of Church Meadows ROS?	MVDC maintain the position that it is unable to maintain the ROS at Land West of Church Meadows (Works.No 40). However, in working with the Applicant it has been agreed that GAL will maintain both the ROS at Church Meadows and Car Park B in perpetuity, which is welcomed.  The Council notes that all mention of the ROS have been removed from the most up to date draft S106 (REP6-060) with no details on where the maintenance commitment from the Applicant will appear. For clarity and assurance, the Council requests that words to this effect are included within the S106.  If it is determined that it is inappropriate to use the S106 to secure this commitment, the Council would ask that it is set out where it will be set out.
DEVELOPN	MENT CONSEN	T ORDER AND CONTROL DOCUMENTS	
DCO.2.26	Local Authorities	Status of Code of Construction Practice At D5 [REP5-072] the Applicant responded to the Legal Partnership Authorities' response in respect of ExQ1 DCO.1.46 [REP3-135 and REP4-062]. The Applicant's position is that the CoCP and its Annexes cover the items listed in the JLA's response to DCO.1.46.	The following represents a streamlined version of that which is submitted by the Joint Local Authorities, with more relevance to Mole Valley:  Regarding the issues identified by the Authorities, set out within responses to ExQ1 DC0.1.46 [REP3-135 and REP4-062], some of these are now resolved, but the following concerns remain;  The Authorities welcome the proposal from the Examining Authority to include the details of the site compounds within the Design Principles control document and hope to consider the additional detail provided by Deadline 8 (assuming submission by the Applicant at Deadline 7).



ExA Q2 Question to	Question	MVDC Independent Response
ExA Q2 Question to	Question  The local authorities are asked if there are any issues identified in its response to DCO.1.46 which are not addressed in the CoCP or its Annexes and if so, what additional information is required and how should it be secured?	There is no reference to the impacts on this footpath within the Public Rights of Way Management Strategy [REP2-009] even though it is referenced in the Code of Construction Practice para 5.12.7 [REP4-008] that such detail is included.  Dust Management Plan  A small number of outstanding points remain for the DMP and these are being submitted by the Joint Local Authorities at Deadline 7, which outlines the current position on the Applicant's DMP.  Construction noise barriers  Acoustic barriers are relied upon to avoid significant noise effects in the construction noise assessment set out in Chapter 14 [APP-039]. Paragraph 14.9.50 [APP-039] lists the following barriers:  • A23 Brighton Road Bridge – along the southern side of the utilities diversion bridge  • A23 London Road Bridge – along the eastern side of the temporary footpath.  • Airport Way Rail Bridge – on the northern side of the eastbound carriageway.  • Car Park X – along the southern site boundary.  These barriers are not secured in the CoCP or the DCO. Specific details of these barriers should be secured through the CoCP including barrier heights and figures
		These barriers are not secured in the CoCP or the DCO. Specific details of these
		Noise and Vibration Management Plan
		The JLAs are of the opinion that a Section 61 application is not a reliable means to secure elements of the CoCP. A Noise and Vibration Management Plan must be submitted to the host authorities for approval at least 6 months before commencement of any construction activities. The Noise and Vibration Management Plan should contain the following:



ExA Q2 Question to	Question	MVDC Independent Response
		<ul> <li>Identification of a dedicated Environmental Manager, with suitable acoustic experience, appointed by the airport, to liaise between contractors and Local Authorities.</li> <li>The baseline noise monitoring methodology (including justification for monitoring locations) and results.</li> <li>Details of noise and vibration trigger levels.</li> <li>Details of best-practicable means including any site-specific mitigation such as barriers.</li> <li>A piling method statement detailing the type of piling to be undertaken and the methodology by which such piling will be carried out.</li> <li>Details of site-specific programmes for noise and vibration monitoring, including the type, location and duration and the method and frequency of reporting the results.</li> <li>Details of properties that qualify for noise insulation and, where appropriate, temporary re-housing.</li> <li>Details of the complaints handling procedure.</li> <li>Details of provision of an online service portal to include:         <ul> <li>a suitable phasing plan to identify potential high impact noise and vibration areas to be reviewed annually.</li> <li>a process to allow complaints to be made online.</li> <li>live measured noise data at each monitoring location including compliance targets</li> <li>historic noise data to allow host authorities to check noise levels against periods when complaints were made.</li> </ul> </li> <li>Further comments on this can be found in [REP4-062], [REP6-099] and [REP6 -101].</li> </ul>



ExA Q2	Question to	Question	MVDC Independent Response
			The Applicant should commit to providing material assistance in administering the Noise and Vibration Management Plan and the Section 61 process through funding for a specific officer.
LANDSCAI	PE, TOWNSCAI	PE AND VISUAL RESOURCES	
LV.2.2	LV.2.2 Applicant Surrey Hills National Landscape While noting the answer to ExQ1 LV.1.8 and Appendix B to that answer, please provide further information concerning the likely extent of overflying (in terms of numbers and increase) which may occur over the proposed extended areas of the Surrey Hills National Landscape as a result of the Proposed Development.		MVDC welcome this question to the Applicant. For the benefit of the ExA's knowledge it is understood that an update regarding the boundary review is imminent and will likely provide more information on the proposed boundaries which were consulted on, by Natural England, in 2023.  It is accepted that the timetables for both the boundary review and the DCO are different. However, in the same way that planning applications and some draft future land allocations are considered in the DCO process with the view of attempting to prevent unacceptable overflying and impacts, the draft boundaries of the Surrey Hills expansion should also provide a guide to the NRP application with the appropriate weight attached.  Adding to the uncertainty on this how the Applicant has accounted for the boundary review is that there is no mention within the draft Statements of Common Ground (REP6-062) between the Applicant and NE. While there is existing wording (2.14.3.1) to confirm that increase in overflights of existing NL will not be unacceptable, this does not exist for the proposals of the boundary review. The Council wishes to see similar wording regarding the newly proposed areas to demonstrate due diligence and that this has been discussed and agreed with NE.  It is requested that the SoCG be updated and/or the Applicant undertake the necessary assessment of possible impacts
NV.2.8	All IPs	Noise limit reviews	In addition to the comments on NV.2.8. submitted by the Joint Legal Partnership, the Council wishes to add the following:



ExA Q2	Question to	Question	MVDC Independent Response
		Whilst routine periodic reviews and extraordinary reviews are considered in R16 in conjunction with Section 8 of Appendix 14.9.7: The Noise Envelope Version 2 [REP5-029] to what extent could this be sufficiently detailed in requirement(s) that allows for both routine periodic reviews and the extraordinary reviews?  How often should routine reviews take place? Who should be able to initiate an interim/extraordinary review? Who should participate in them and how? What would be the scope of such reviews?	It is the Council's view is that the compliance process has four parts:  i. Fleet forcasts ii. Noise Monitoring and Data Collection iii. Factual reporting of the measured/modelled contours iV Noise forcasting and retrospective review  MVDC consider it reasonable for the Applicant to provide appropriate funding for suitably qualified and agreed experts to undertake s available at the 3 and 5 yearly reviews



## **Appendix 2: Joint Comments on Applicant's Response to Examining Authorities Comments (ExAQ2)**

ExA Q2	Question to	Question	MVDC Response (Written in Partnership)		
CASE FOR THE	PROPOSED DEVELO	PMENT			
CS.2.1	Applicant Local Authorities	Statements of Common Ground on Forecasting & Need and Capacity & Operations  The ExA note the issues regarding the submission of the above SoCG referred to in the D5 Cover Letter [REP5-001] and the references within the 'Applicant's Response to Deadline 5 Submissions – Response to York Aviation' at D6, including the intention to submit an updated version at D7.  Please ensure that such documents are submitted at D7. Even if such documents are still in a state of flux, the agreed differences between the parties on these issues would be of assistance to the ExA.	The Authorities are co-operating with the Applicant on this matter to ensure submission into the Examination at Deadline 7.		
NOISE AND VIB	NOISE AND VIBRATION				
NV.2.1	Applicant	Noise Thresholds As noted in the Communities Against Gatwick Noise and Emissions (CAGNE) D2 submission [REP2-070], Stansted and Bristol airport expansion schemes used	This matter is addressed to the Applicant and the JLAs will comment fully at Deadline 8. However, the Legal Partnership Authorities express support for this proposal.		



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
		an adverse effect level of 69 L <sub>Aeq</sub> day and 63 L <sub>Aeq</sub> night, and the same values were not contested during the Examination of the Luton DCO.  Why should the same values not be used for the Proposed Development?  How would the Applicant propose to modify its off-site mitigation proposals through Appendix 14.9.10: Noise Insulation Scheme [REP4-017], if these noise levels were to be regarded as unacceptable?	
NV.2.2	Applicant	Off-site mitigation As a general principle is it accepted that once a premises is predicted to be eligible for off-site mitigation the aim is to ensure the necessary mitigation is in place before the noise occurs that would otherwise be likely to cause the significant adverse noise effect on occupants of the premises?  Is it also accepted that the internal living environment must remain acceptable, including with regard to ventilation and overheating?	This matter is addressed to the Applicant and the JLAs will comment fully at Deadline 8. However, the Legal Partnership Authorities have consistently expressed a view that any off-site mitigation scheme needs to take into consideration the relationship between noise ventilation and overheating and ensure that a holistic approach is taken to achieving policy compliant living conditions.
NV.2.3	Applicant	Noise insulation inner and outer zones	This matter is addressed to the Applicant and the JLAs will comment fully at Deadline 8. However, the Legal Partnership Authorities refer to the



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
		Given that the 2013 APF says "We will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance" and that post Survey of Noise Attitudes (SONA) the ANPS 2018 refers to 54 dB day, would not a single noise insulation scheme, aligned at least with the timescales of the proposed zone 1 scheme, starting at 54 dB achieve greater consistency with ANPS 5.68?  Could not the same argument apply to night-time noise, recognising attention drawn to night-time noise and sleep disturbance in policy wording?	requirements of the ANPS. We note that para 5.67 refers to legal requirements and also the NPSE. Para 5.68 is virtually identical to the aims of the NPSE. This does not consider itself limited to consideration only of sounds that could be considered to be at a threshold of SOAEL or above. The response to noise that is within the LOAEL range and approaching SOAEL is that proportionate action should be taken based on the sound level. The JLAs have highlighted that, particularly for night, further consideration needs to be given to mitigation commencing at the threshold of LOAEL. In connection with the offsite mitigation the Applicant said at ISH8 that the areas within the 48 dB LAeq 8h night contour would qualify for insulation by virtue of being within the 54 LAeq 16h day contour. This is not to the night LOAEL; and the measure set out for the outer zone day period is unlikely to address the impacts on people at night. To that extent the JLAs are concerned that the off-site mitigation does not address the impacts associated with the night noise and that a specific and proportionate scheme needs to be in place to address night noise to ensure compliance with all policy including the Overarching Aviation Noise Policy 2023.
NV.2.4	All IPs	Off-site mitigation To what extent could relevant authorities, including local planning authorities, play a role in, for example, reviewing the forecasts of premises identified as eligible, involvement in community engagement including support with special cases, and approving proposed designs with regard to relevant standards, to assure consistency with the first aim of noise policy as set out in the ANPS at para 5.68?	There is an expectation by the local authorities comprising the JLAs they will be fully involved with the scheme of mitigation through a scrutiny group either as defined role for the Environmental Scrutiny Group proposed in the JLA Environmentally Managed Growth Framework or as separate mitigation group if EMGF is not adopted.  This role is consistent with statutory responsibilities incumbent on the local authorities and any that may be bestowed under the DCO.  It is expected that this group would form the basis for formal consultation, engagement and either approving (with amendment as required) or making recommendations to the relevant authority.



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
			The scope of such involvement would include: The approach to community engagement Annual review and scrutiny of predictions for airport operations, the resultant noise levels and the nature of the mitigation. Approval of the internal standards to be achieved consistent with national noise and aviation policy Any decision making principles in how the scheme is administered and the setting and monitoring of appropriate performance targets. The agreement of programmes to assess the adequacy and performance of the scheme to identify improvements. The agreement of changes to the scheme to take account of changes to science, policy, legislation and the monitoring of the efficiency of the scheme.  All costs incurred by the local authorities work would need to be funded through the DCO.
NV.2.5	Applicant	Noise limit values Para 5.60 of the ANPS states that "The benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction." The Applicant summarised at D3 a benefits sharing calculation in relation to Bristol airport, provided an updated central fleet transition case at D4, introduced its revised noise limit proposals at ISH8 and would submit these revised proposals at D6.	This matter is addressed to the Applicant and the JLAs will comment fully at Deadline 8. However, the JLAs note that there are a number of aspects to this question that potentially could be used in determining limits.  With reference to the principle of "sharing the benefit" the JLAs have highlighted that there were incomplete discussions about this and that they sought to consider the sharing the benefit on the basis of applying the 2029 fleet technology to the 2019 ATMs to produce a noise contour and that this would provide the basis for consideration of sharing the benefit. This is a slightly different question to that posed by the Examining Authority but we mention here in the event it provides some assistance in this consideration.



ExA Q2 Question to	Question	MVDC Response (Written in Partnership)
	Comparing 2029 with 2019 how much quieter is the aircraft fleet expected to be in terms of source noise levels? Please provide sufficient details to support the response provided.	
	If the noise limits for air noise only were expressed as follows:	
	From the commencement of dual runway operations, the forecast change in air noise level caused by the operation of the airport at any residential premises shall be no greater than:	
	x1 dB in terms of LAeq day summer period y1 dB in terms of the LAeq night summer period x2 dB in terms of LAeq day non-summer period y2 dB in terms of the LAeq night non-summer period	
	compared with the 2019 forecast values for the same parameters, where x1, y1, x2, y2, are real numbers.	
	Whilst the comparison is between values of the same parameter, which	



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
		parameter is considered most appropriate in this context and why? Are limits in terms of other parameters considered necessary? What would be the proposed values of x1, y1, x2, and y2? How do the values proposed demonstrate consistency with the ANPS statement above? Please provide sufficient details to support the response provided.	
NV.2.6	Applicant	Noise limit compliance Despite the Applicant's assurances at ISH8, and considering the submissions made by the Joint Local Authorities, does the Applicant accept that once capacity has been declared it may not be able to prevent a forecast breach of a noise limit because of, for example, slot allocations that have already been made through existing rights? Is this what is meant by "including respecting, for example, historic slot rights" at 7.2.3 of the Appendix 14.9.7: The Noise Envelope Version 2 [REP5-029]?  To what extent would a requirement within the DCO carry sufficient weight to overcome any or other such constraint that may interfere with compliance with any noise limit?	This matter is addressed to the Applicant but the JLAs have provided a response to the Applicant's Appendix A "Avoidance of Noise Envelope Breaches" at Deadline 7. Further comments may be made at Deadline 8.



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
		Would it be possible to factor in any constraints imposed by 'other laws and international obligations' with reference to R15(3) of the dDCO [REP5-004] into the forecasting process, in addition to the noise limits, to determine capacity that could be declared that would be consistent with meeting the noise limits?	
NV.2.7	Other IPs	Independent noise reviewer Provided the compliance process is detailed sufficiently within the requirement(s) of the dDCO would other Interested Parties accept that the Civil Aviation Authority, acting as the independent noise reviewer, would be a relevant authority to review the Applicant's analysis and forecast and confirm compliance with the requirement(s)?	The view of the JLAs is that while the Civil Aviation Authority does have a role and is an important partner it cannot be considered that the review would be independent.  Much of the work presented to the Civil Aviation Authority by the Applicant for independent review would be dependent on work from a division of the Civil Aviation Authority itself.  The JLAs see it as important that there is local democratic accountability and full transparency in process and do not consider that this can be guaranteed under the proposal. During the pre-examination period the JLAs approached the CAA directly for information so that they could procure noise modelling because the Applicant declined the JLAs request. The CAA were unable to provide assistance as the Applicant declined access to the data. The CAA were clearly influenced by the Applicant and therefore cannot be considered as independent.  The JLAs have experience of making arrangements for obtaining independent advice in relation to airport activities. This includes for the DCO.
			The JLAs would also like to be assured that whoever conducts the review has the full set of skills for all elements of the AMFR including fleet



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
			forecasting.
			The JLAs remain of the position that they should be funded by Gatwick, to appoint appropriate expertise to perform this function.
			The JLAs are also unclear how the CAA would participate in any enforcement as they do not have powers and whether this would fetter investigation and any enforcement.
			The JLAS also bring to the attention of the Examining Authority that reviews are agreed between the airport and the Independent Noise Reviewer and the Applicant and the lack of a robust role for the JLAs is a matter of objection.
NV.2.8	All IPs	Noise limit reviews Whilst routine periodic reviews and extraordinary reviews are considered in R16 in conjunction with Section 8 of Appendix 14.9.7: The Noise Envelope	Paragraph 5.60 of the ANPS sets out policy requirements for a Noise Envelope. It states that: "Suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant". As such,
		Version 2 [REP5-029] to what extent could this be sufficiently detailed in requirement(s) that allows for both routine periodic reviews and the extraordinary reviews?	Noise limit reviews should be undertaken regularly throughout the lifespan of the Noise Envelope. Additionally, a review should be undertaken at an early point after the NRP is operational so any new trends can be accounted for. This is particularly important so that the Noise Envelope remains relevant, as per policy requirements.
		How often should routine reviews take place? Who should be able to initiate an interim/extraordinary review? Who should participate in them and how? What would be the scope of such reviews?	Requirement 16 of Schedule 2 of the Draft DCO [REP6-005] secures the review period for the Noise Envelope with reference to section 8 of the Noise Envelope [REP6-055]. Paragraph 8.1.2 [REP6-055] states: "the noise envelope limits are to be set for the first 14 years of dual runway operation, to provide certainty of what will be achieved in the initial opening period, and every 5 years thereafter the limits will be subject to a review to ensure they remain relevant". This contradicts information in section 6 [REP6-055], which is only referenced in the DCO when defining



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
			the term 'noise limits'. The JLAs would like some clarification on what the Applicant is committing to in terms of reviews.
			The JLAs would like to see routine reviews of the Noise Envelope every 5-years and aligned with the Noise Action Plan with the first review undertaken no later than 3-years after commencing dual runway operations. This early review would allow the noise envelope to be relevant for the early period of opening based on emerging fleet trends and movement numbers.
			Reviews could be triggered by future aircraft; approval of an airspace change or an event outside the airports control. The JLAs are of the opinion that they should form part of an Environmental Scrutiny Group, which would be consulted on regarding an extraordinary review. Either the Applicant or the ESG could initiate an extraordinary review with a view to reducing noise limits.
			Extraordinary reviews should be undertaken only with the intention of reducing noise limits. There should be no circumstances where there is a permanent increase in noise contours limits to provide communities with certainty regarding the level of noise they can expect in the future.
			The consideration of "force majeure" was discussed at the noise envelope group. This was in the context of a defence to an exceedance of a noise limit rather than provision for an increase in the noise contour limits.
			It is important to allow noise contours to be contextualised through provision of noise data from individual aircraft. This would allow any material changes in aircraft noise levels to be identified, which is important to understand when future aircraft come into service or in the event of a force majeure. It is requested that the Applicant provide the



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
			measured SEL and LAmax noise levels logged as part of their Noise and Track Keeping system. This data should cover the aircraft that make up 75% of the total noise energy as per CAP2091. The data should be provided in the Annual Monitoring and Forecasting Reports.
TRAFFIC AND TRANS	PORT		
TT.2.3	Local Authorities	Future Baseline Sensitivity Analysis - Traffic and Transport Are the local authorities satisfied that the commentary on the effects of the future baseline sensitivity analysis [REP5-081] provides an accurate assessment of the possible effects on all factors that are covered within Chapter 12 of the ES.	REP5-081 provides an assessment of the possible environmental effects of the revised future year baselines in summary form and it covers the relevant topics. The Joint Local Authorities seek more details and comments on REP5-081 which are contained within the Deadline 6 Submission entitled, Comments on any further information/ submissions received by Deadline 5 [REP6-099]. Section 10, on page 22 of this submission, covers the comments on traffic and transport. See also REP6-101.
TT.2.11	Applicant Joint Surrey Councils	Active Travel Access to Airport The Joint Surrey Councils [REP6-101] in response to [REP5-072] TT.1.23 p181 express a number of outstanding concerns with respect to the inadequacy of the active travel infrastructure being proposed. The ExA noted the response [REP3-104] to TT.1.27, but also understands the concerns of the Joint Surrey Councils. The ExA notes the improved shared route from Longbridge roundabout but also appreciates that this is along a busy dual carriageway. In terms of tree loss, the ExA notes that there will be considerable impact along	The JLAs agree with the EXA in relation to increasing permeability and active travel access that could be realised by the new crossing on the A23.  SCC has requested improvement of the AT route between Horley and North Terminal through Riverside Garden Park between the new A23 signalised crossing and Riverside Garden car Park as the most direct route between Horley and the North terminal.  As a reminder, SCC's other outstanding concerns with respect to the inadequacy of the active travel infrastructure being proposed are:  1. The inadequacy of sections of the AT route via Longbridge Roundabout with sections over the River Mole bridges being provided as shared use rather than segregated;



ExA Q2 Que	estion to	Question	MVDC Response (Written in Partnership)
		the A23 on the boundary of the Riverside Park.  Is this therefore the right time to look at increasing permeability and active travel access that could be realised by the new crossing on the A23?	<ol> <li>Non-improvement of the AT route between Horley and South Terminal from the end of The Crescent through Car Park B west of the railway as the most direct route between Horley and the South Terminal.</li> <li>Non-improvement of the AT route across the railway line south of the A23, as there is no cycle crossing provision between Victoria Road and Radford Road.</li> </ol>
Na Hig Hig	oplicant ational ghways ghways ithorities	Active Travel Access to Airport The North and South Terminal Roundabouts BAU Improvement Scheme Plans [REP6-012] show concept designs for signalisation of the north and south terminal roundabouts.  Should there be controlled pedestrian and cycle crossings on any elements of these design layouts to enable safe active travel around the airport?	The proposed highway works to the North and South Terminal Roundabouts are not within WSCC's or SCC's highway network and are within National Highway's network or within the Applicant's control.  Notwithstanding these works are on National Highway's network, the Joint Local Authorities have the following views on pedestrian and cycle access. Given the nature of the road network at South Terminal Roundabout, and that there are no existing pedestrian or cycle desire lines, there is not considered to be a need for formal crossing points at this location.  At North Terminal Roundabout given existing desire lines consideration could be given to pedestrian crossing improvements. These could be at North Terminal Approach, on the pedestrian desire line underneath the structure that carries the Gatwick Airport Shuttle Transit and then connects into the footway that leads towards Northway. Secondly, consideration could be given for pedestrian crossing enhancements at Longbridge Way to implement a crossing over Longbridge Way, that provides an onwards connection to footpath 346_2Sy.  Given the location and likely use of these crossings they may not be signalised controlled crossings but footway enhancements with dropped kerbs, tactile paving and pedestrian refuges may be able to be provided.



ExA Q2	Question to	Question	MVDC Response (Written in Partnership)
			However, these would be most beneficial/should be provided as part of a wider active travel network rather than standalone features.