

Gatwick Airport Northern Runway Project

Response to the Examining Authority's Written Questions (ExQ2) – Socio-Economic Effects

Book 10

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APFP Regulations 5(2)(q) Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



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- 1 Response to the Examining Authority's Written Questions Socio-Economic Effects
- 1.1.1 The below table sets out the Applicant's response to the Examining Authority's Written Questions relating to Socio-Economic Effects.

ExQ1	Question to:	Question:
SOCIO-	ECONOMIC EFF	ECTS
SE.2.1	Applicant	Construction Communications and Engagement Plan - stakeholders
		Paragraph 2.1.2 of the Construction Communications and Engagement Plan (CCEP) [REP2-015] states that reasonable steps will be taken to engage with the local community, particularly focusing on those who may be most affected by construction impacts. Please confirm how such would groups be identified?
		Paragraph 4.1.1 of [REP2-015] further states that in implementing the CCEP, the Applicant will work with the Community Liaison Officer and the Principal Contractor(s) to identify the stakeholders to be targeted by the communication and engagement activities, and which will be kept under regular review in line with the construction programme. Again, please confirm how such stakeholders would be identified and how the review would take place?
		Community groups, local residents and stakeholders will be identified based on their geographical proximity to specific work areas and how they may be impacted. For example, for works planned in a specific area, we would identify individual addresses or groups based on the predicted noise model where noise levels are calculated to exceed threshold levels. Another example is where local roadworks that require temporary traffic management, groups would be identified based on the likelihood of them being impacted, which includes their proximity and access routes to and through the roadworks or near to schools. Where potential impacts are identified, the relevant local authority Environmental Health Department will be informed and consulted as

		 appropriate. This approach has been taken with previous projects at London Gatwick including the Main Runway Resurfacing Works. The review will be based on the monitoring of actual progress duration vs planned progress duration of specific work areas against the construction programme and any differences would need to be communicated to the identified residents or community groups. GAL will appoint a CLO to liaise with the Principal Contractor for all construction works within or near the airport associated with the DCO. This will involve identifying local residents, community groups and other stakeholders and would include carrying out letter drops, attending parish council sessions and community meetings in the areas affected by the works as appropriate. The CLO will be able to collate and relay legitimate concerns from local residents to GAL and the Principal Contractor to coordinate mitigation measures to be implemented, where applicable. We understand the utilisation of CLO's has positively been supported by WSCC on other non-GAL projects in the area.
SE.2.2	Applicant	Construction Communications and Engagement Plan - communication Bullet 4 of paragraph 6.1.2 of the CCEP [REP2-015] states that community newsletters 'may' be prepared and bullet 5 states that a helpline will be provided 'when required'. What are the trigger points for these communication methods? It is noted that the other proposed methods of communication listed appear to focus on the assumption of individuals having access to social media and websites. Please review and comment. Community newsletters will be an important channel of communication to inform local residents, community groups and other stakeholders of planned works and progress. The trigger points for the newsletter will be informed by the detailed construction programme, to ensure that stakeholders and communities have advance notice and regular progress updates on planned works that might impact them. The timing and frequency of



		the newsletter will be informed by the nature and location of each stage of work. The trigger point for the helpline will also be informed by the detailed construction programme and the nature and location of works to ensure that communities can contact the Project team if they require further information or wish to make a complaint. The proposed methods of communication take account of the different ways that stakeholders and communities access information and news. Online communication is an important element and will be effective for a large proportion of the population, however we have also planned written and face to face communications to ensure an inclusive approach which reaches individuals and communities that may not be able to access online resources. This approach has been adopted through each of the consultation periods associated with the Project.
SE.2.3	Applicant	Mitigation Route Map Please review the 'Potential Impact' columns for rows SE-3 and SE-4 of the Mitigation Route Map [REP2-011]. Should the impact refer to construction traffic rather than the name of the proposed mitigation plan? Yes, the 'Potential Impact' column of the ES Appendix 5.2.3: Mitigation Route Map [REP2-011] for rows SE-3 and SE-4 should both refer to the impact of construction traffic, rather than the associated control documents.
SE.2.4	Applicant	Mitigation Measures – Healthcare Practitioner The ExA notes that in response to ExQ1 SE.1.3 [REP3-103] the Applicant confirmed that the occupational healthcare support needs of the construction workforce would vary over time with the size and composition of the workforce.

Please confirm how the healthcare support would be determined?

Further to **The Applicant's Response to the ExA's Written Questions (ExQ1) – Socio-Economic effects** [REP3-103] ExQ1 SE.1.3, this response clarifies how the healthcare support needs of the construction workforce would be determined and met.

The healthcare support need would be scaled primarily with reference to the current and planned workforce numbers, though also with regard to the nature of the activities being undertaken. The level of provision would, as a minimum, comply with the Health and Safety (First-Aid) Regulations 1981 and the UK Health and Safety Executive guidance L74 (Third edition) Published 2013 and updated in 2024. The Health and Safety (First-Aid) Regulations 1981 which require employers to provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work. This existing legal requirement does not require securing through the DCO. The UK Health and Safety Executive guidance requires that periodic needs assessments are undertaken that consider, amongst other criteria, the nature of the work, workplace hazards and risks, work patterns, the nature of the workforce and both physical and mental health.

ES Chapter 18: Health and Wellbeing [APP-043] Table 18.7.1 confirms that "Proportionate to the scale of workforce onsite and the need to supplement the normal 111 service, a dedicated healthcare practitioner would be available for construction workers to consult with." Section 5.11 of the Code of Construction Practice [REP4-007] (secured by DCO Requirement 7) explains that to alleviate the potential for pressure on the local health care system, provision and implementation of a protocol setting out the first point of contact for health queries for construction workers. The level of on-site support required will depend not just on the number of workers on site but also on the types of activities that are being carried out. The protocol will be updated through the various phases of the development to ensure both compliance with the legislation but also the guidance and to ensure appropriate provision is made. This section of the CoCP has been updated to

		clarify the intention that healthcare support would be determined by reference to a systematic identification of the occupational health and safety risks arising as a result of the construction activities.
SE.2.5	Applicant	Local Economic Impact Assessment – Gateway Gatwick
		The ExA notes that in response to ExQ1 SE.1.11 [REP3-103] the Applicant states that 'Initiatives could encourage additional inbound international passengers facilitated by the Proposed Development to spend more nights in the region'. Please confirm how this would be measured?
		As part of the development of the Draft ESBS Implementation Plan [REP3-069] the Applicant is working with stakeholders to identify appropriate KPIs across proposed interventions. The ESBS Implementation Plan approved by the ESBS Steering Group under Schedule 5 of the draft DCO s106 Agreement [REP6-063] will include specific monitoring and evaluation activities. Measuring the effectiveness of activities like marketing campaigns is more difficult than, for example, the number of people placed into work, because it is less direct and the data is less available. There are ways that it can be done through tracking the number of people who click on an online promotion and then follow through and book but this may not provide the full extent of the number of overnight stays generated.
SE.2.6	Applicant	Employment Skill and Business Strategy - Implementation Plan
		In response to the Joint Surrey Councils LIR [REP1-097], it was acknowledged by the Applicant in Table 3.10 of [REP3-078] that training opportunities, as detailed in the draft Implementation Plan should be accessible and consideration was to be given to the funding of travel associated with training.
		Please signpost to where this is reflected in the draft Implementation Plan.

		Our original response still stands – " <i>The Applicant agrees that training does need to be accessible. Decisions on whether to fund travel will be taken through the development of the Implementation Plan</i> ". The current Draft ESBS Implementation Plan [REP3-069], as appended to the draft DCO s106 is not designed to cover this level of detail pre-consent. This detail is required to be included in the ESBS Implementation Plan which will be submitted to and approved by the ESBS Steering Group as set out in section 3.7 of the Draft ESBS Implementation Plan. This will include the necessary consideration/confirmation of any funding required to ensure training accessibility.
SE.2.7	Applicant	Employment Skill and Business Strategy – mitigation and compensation
	East Sussex County Council	Please review row 2.19.4.2 of the East Sussex County Council SoCG [REP5-039] and confirm whether the status of 'agreed' is correct?
		The Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP5-039] relates to the change in status of the Coast to Capital Local Enterprise Partnership. The ESBS was submitted prior to the Government decision to move regional Local Enterprise Partnership (LEP) responsibilities and funding to upper tier local authorities. In the case of the Coast to Capital LEP, these responsibilities and funding have been transferred to West Sussex County Council and Surrey County Council. GAL is already engaging with both authorities as they establish the relevant governance structures for this new role, for example, GAL is a member of the West Sussex Interim Economy Board and the Surrey Business Leaders Forum. Coast to Capital will continue to operate, not as a LEP, but as an independent economic development organisation and GAL will continue to engage with them on that basis. The ESBS will be updated to reflect these changes.
SE.2.8	Applicant	Employment Skill and Business Strategy – securing mechanism

At row 17 of the Kent County Council PADSS [REP5-096] it is stated that the Employment Skills and Business Strategy (ESBS) should be secured either in the form of a Requirement, or a control document such as a Stakeholder Actions and Commitments Register. Please provide draft wording for a Requirement and provide additional detail in respect of a draft Stakeholder Actions and Commitments Register.
As set out in the response to Action Point 11 of ISH2 in the Applicant's Response to Actions – ISHs 2- 5 [<u>REP2-005</u>], while it may be possible, in principle, for elements of the draft DCO Section 106 agreement to be pulled out into requirements, in many cases there are practical advantages to using a section 106 agreement to secure commitments. The Applicant's preference is for this to remain in the draft DCO Section 106 agreement for the following reasons:
 The Applicant considers that benefits of the ESBS will be maximised through collaborative working with the relevant local authorities and key stakeholders in a number of sectors. The DCO s106 Agreement will be signed by CBC which shows their positive intention to be involved in the development of the ESBS Implementation Plans.
• The structure of the ESBS Implementation Plan has been set up to involve numerous third parties, many of whom will be in the public or third sector, in delivering the objectives of the ESBS. Through this approach the Applicant does not and will not have control over the activities of these parties as it will its own contractors. The Applicant and Steering Group will agree KPIs for each third-party delivering activities under the ESBS but it would be inappropriate for the Applicant to hold these parties to the same standard that it would require of its contractors. If implementation of the ESBS Implementation Plan is secured by a DCO Requirement, the Applicant would assume the responsibility for the delivery
of all of the activities with the associated criminal liability for breach and therefore the risk to the Applicant of involving these third parties is much higher. Under the DCO s106 Agreement however,

although the Applicant is still responsible for the delivery, it can work more dynamically with the stakeholders and third parties to ensure effective delivery.

- The ESBS Fund is proposed to be explicitly secured through the draft DCO s106 Agreement with the detail of how such fund it to be spent set out within the ESBS Implementation Plan agreed by the ESBS Steering Group. This encourages and allows for discussion and collaboration in a way that a formal submission and approval under the DCO would not. Were the ESBS Implementation Plan to be secured through a DCO Requirement the ring-fencing of this fund would be secured through compliance with the ESBS itself which would make it less visible to all parties.
- In ExQ2 SE.2.9 the ExA have asked for more detail as to how, if the ESBS was secured via the dDCO, this would result in a layer of complexity and administrative challenge to parties involved. As a DCO Requirement, the Applicant would assume criminal liability for any breach of the delivery of the terms of the ESBS Implementation Plan and would therefore require a much more rigid system of consultation and accountability with any parties delivering on these obligations on its behalf. This will need to include the availability of more draconian enforcement action to prevent a breach of the DCO by a third party. This is not conducive to collaborative working and the Applicant considers that this approach would hamper the delivery of the ESBS. The structure of the ESBS, ESBS Steering Group, ESBS Fund and Draft ESBS Implementation Plan has been established through close working with the local authorities on the basis of the drafting set out in the draft DCO s106 Agreement. Were this to be secured by a DCO Requirement, the Applicant would have set up these structures differently and were that to be the case now, the Applicant would need to retrofit a system to the formal drafting being mindful of the statutory enforcement mechanisms. As the Applicant considers that the success of the ESBS would be maximised through collaborative working; this retrofit exercise would add a layer of complexity and administrative challenge to the parties involved.

Further to engagement with Kent County Council, it was added as a member of the ESBS Steering Group,
along with East Sussex County Council, in the Deadline 6 version of the draft DCO s106 Agreement [REP6-
<u>063]</u> .
Nonetheless, should the ExA be minded to secure the ESBS by the DCO Requirement we would propose the
following DCO Requirement:
(1) No part of the authorised development may commence until an Employment Skills and Business
Implementation Plan has been submitted to Crawley Borough Council for approval in writing (in
consultation with WSCC, ESCC and KCC).
(2) The Employment Skills and Business Implementation Plan submitted pursuant to sub-paragraph (1) must
be substantially in accordance with the Employment Skills and Business Strategy and must be in the form
of the Draft Employment Skills and Business Implementation Plan.
The Employment Skills and Business Implementation Plan must be implemented as approved pursuant to sub-
paragraph (1), unless otherwise agreed with in writing by CBC (in consultation with WSCC, ESCC and KCC).
This would require the ESBS and Draft ESBS Implementation to be significantly restructured and framed to
secure the ESBS Fund, ESBS Steering Group and reflect the nature of this change. The documents have
been prepared on the basis that they encourage collaboration and are secured through the drafting in the draft
DCO s106 Agreement.
"Stakeholder Actions and Commitments Register"
A "Stakeholder Actions and Commitments Register (SAC-R)" was submitted with the Lower Thames Crossing
DCO Application to reduce the legal time/expense associated with legal agreements and to give the ExA and
Interested Parties visibility of the commitments in the legal agreements without needing to wait for the

		completed agreement. During the examination however, the applicant entered negotiations with the local authorities to enter into a series of s106 agreements.
		The control system for a project is set up and established at the application stage and there is no singular way that is required to be followed by all infrastructure projects. Although consideration of previous projects is helpful they do not provide a precedent and the SoS must decide for each application whether the mitigation measures that are required to make the project acceptable in planning terms have been appropriately legally secured.
		The NRP established its control structure through a draft DCO and s106 Agreement as the primary mechanisms of legal control with numerous control documents secured through those mechanisms. The control documents allow for technical information which is required to contextualise the requirements to be included and allows for controls to specifically restrict how a particular activity or work in a particular area is carried out. As such a Stakeholder Actions and Commitments Register (SAC-R) is not required because the ESBS commitments can be adequately legally secured through a commitment in the s106 Agreement, or the DCO requirement proposed above. An SAC-R would provide no additional 'control' or benefit in the context of this project's approach to mitigation.
SE.2.9	Applicant	Draft Section 106 Agreement – Explanatory Memorandum
		Noting the response by the Applicant to ExQ1 SE.1.5 [REP3-103], discussions held at ISH3 ([EV8-001] and [EV8-002]) and on-going dialogue between parties, paragraph 4.24.4 of the draft Section 106 Agreement EM [REP6-096] refers to the ESBS as being a package of enhancement measures.
		At paragraph 4.24.9 of [REP6-096] it is further stated that the obligations are considered necessary to make the Proposed Development acceptable in planning terms. As such, should the ESBS therefore not be secured via a requirement in the dDCO?



		In addition, noting paragraph 4.24.10 of the s106 EM [REP6-096] please provide more detail as to how, if the ESBS was secured via the dDCO, this would result in a layer of complexity and administrative challenge to parties involved.
		Paragraph 4.24.9 of the Draft DCO Section 106 Agreement – Explanatory Memorandum (Doc Ref. 10.54) has been corrected to state that the ESBS is considered an enhancement measure.
		An explanation of the implications of securing the ESBS through a DCO Requirement is set out in response to SE.2.8.
SE.2.10	Applicant	Commercial Floorspace
		The ExA notes the comments made at row LESE 13 of the CBC PADSS [REP5-085]. In addition, the ExA noted the comments made by the Applicant during ISH8 regarding this matter ([EV17-001] to [EV17-005]).
		However, at row 2.19.5.3 of the CBC SoCG [REP5-037] it is stated by CBC that the commercial space may be occupied by users not related to the airport and as such the offices would not fall under the definition of <i>'Associated Development'</i> .
		Please confirm if it is intended that the commercial space is to be occupied by airport-related companies/ individuals and if so, is it necessary to secure the use in the dDCO? If occupation does not relate to airport use, how is the definition of 'Associated Development' complied with?
		To confirm, the proposed office space forming part of Work No 28 to the dDCO would be used for airport- related business purposes. The Applicant clarified at ISH8 (as noted in para 2.1.32 in its summary of oral submissions from the hearing (The Applicant's Written Summary of Oral Submissions - ISH8 - Good Design [REP6-080])) that whilst it could not be confirmed that it would be exclusively used for employees of the Applicant otherwise displaced from the current office-space at Destinations Place, it would be used and

		 made-available for wider airport-related business use (e.g. airlines or other companies associated with activities at Gatwick). The precise occupier is not yet known given the stage of the Application/development process; however, self-evidently the future occupier will choose to be located at Gatwick airport for that specific reason. To provide additional comfort on this point, the Applicant has added new requirement 34 in version 9 of the draft DCO (Doc Ref. 2.1 v9) which provides that the new office must only be occupied by an entity related to, or whose business and/or operations are related to, the airport, air travel and/or aviation, unless otherwise agreed in writing by CBC. The Applicant has explained in previous submissions why the development properly constitutes <i>associated development</i> for the purposes of the Planning Act 2008 (e.g. row 2.19.5.2 of the Statement of Common Ground with Crawley Borough Council [REP5-037]) and does not repeat the same submissions, other than to confirm the above is consistent/coherent with that response.
SE.2.11	Applicant	Property ValuesThe ExA notes the Applicant's responses to both ExQ1 SE1.13 [REP3-103] and CA.1.22 [REP3-087] in respect of property values and compensation. Additionally, in Table 17.4.2 of ES Chapter 17 [APP-042] the Applicant confirms that the Proposed Development could result in negative effects on some property values. To date no supporting data has been submitted into the Examination to support this statement.The ExA accepts in this instance it is not appropriate to share commercially confidential information in respect of individual residential property values. However, as external advice and/ or studies have been undertaken on behalf of the Applicant please submit an executive summary of this information, without specific property values, to support the assessment findings.
		For clarity, Table 17.4.2 of Chapter 17 to ES Chapter 17: Socio-Economic [<u>APP-042</u>] sets out the 'issues' scoped out of the assessment, and explained in the second row why the Project's potential effects on property prices (both negative and positive) was not considered in the socio-economic assessment. That explanation is

		 not repeated in full in this response, save to re-confirm that the assessment did not make any 'findings' in respect of property prices as such matter was scoped out. Specific to this question, the table explained that insofar as any negative impact on property prices did occur, "Part 1 of The Land Compensation Act 1973 (LCA) makes statutory provision for payment of compensation to qualifying property owners of properties that are depreciated in value as a result of the physical effects – noise, smoke, fumes etc. – of the use of development works such as an airport expansion. Therefore, if there were to be any negative effects on property prices, the provisions of the LCA would apply and provide for payment of compensation to fully cover any loss in value." The study into the potential for future claims under Part 1 of the Land Compensation Act 1973 was commissioned by the Applicant to ensure that the Property Cost Estimate was robust (as reported in CA.1.22 [REP3-087]). The full extent of the report, including any executive summary, is commercially confidential and not appropriate for disclosure in the examination. It has no relevance to the assessment of the Project's effects for the reason explained in Table 17.4.2 and its relevance to the Funding Statement is limited to the Applicant's confirmation that the Property Cost Estimate is robust and capable of covering any successful claims that were made under Part 1 of the LCA. For the avoidance of doubt, the Applicant re-confirms that to be the case.
SE.2.12	Applicant Local Authorities	Local Authority Level Assessments In respect of local level effects, the ExA notes the response to ExQ1 SE1.18 [REP3-103] by the Applicant and the content of ES Appendix 17.9.2: Local Economic Impact Assessment [APP-200]. The responses given by the Applicant during ISH3 regarding this matter ([REP1-058], [EV8-001] and [EV8-002]) insofar as the assessment was undertaken at the functional market area level is also noted. Additionally, the content of ES Appendix 17.6.1 Socio-Economic Data Tables [APP-197], in respect of the context of potential impacts within specific administrative boundaries, is acknowledged.

The ExA also acknowledges that ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP- 201] contains a housing assessment at the local authority level and construction employment at the local authority level is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199].
The ExA understands that the Applicant is maintaining their position insofar as the functional market area level is considered the correct level to undertake the socioeconomic assessments. Despite this, the ExA remains concerned that several of the local authorities consider that the assessments undertaken to inform ES Chapter 18 [APP-042] do not provide sufficient information at a local level to satisfactorily inform of specific local level socio-economic effects. This remains a recurring theme raised by the several of the local authorities at each of the Examination deadlines. Related to this is also a level of concern raised by local authorities in respect of the sensitivity and magnitude criteria for several socio-economic receptors.
SoCGs and PADSS. The ExA however requests that a high-level update is provided by all parties in respect of these issues, to include details of whether future meetings are planned to discuss these matters and a realistic view as to whether this issue is capable of being resolved prior to the end of the Examination.
A further Topic Working Group (TWG) on these matters is planned. As set out in the question, the Applicant has assessed significance at the relevant functional economic or housing market area level, but has also provided information about the project's effects at the local authority level where available. This is in line with PINS guidance – Annex to Advice Note 7: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements, concerns the Presentation of the Environmental Statement. When identifying and assessing impacts, it states: <i>"the study areas should be sufficiently robust in order to undertake the assessment The extent of the study areas should be established in accordance with recognised professional guidance and best practice, whenever this is available, and determined having regard to the extent of likely impacts." The Applicant considers that its definition of the different study areas used</i>
to the extent of likely impacts." The Applicant considers that its definition of the different study areas used

		<10 miles	42%	47%	36%	49%	46%	29%	63%	37%	37%	43%	38%	38%
		Region	UK	East Midland s	East Englan d	London	North West	South East	South West	West Midlands	Yorks & Humber	Northern Ireland	Scotland	Wales
The travel to work data is the regional average for the South East. As the following table show different from some of the other UK regions and therefore does take account of local geograph									ohies.					
SE.2.13 Applicant Distance travelled to work data Please confirm whether the data used within E of distance travelled to work considers variation 2.19.1.6 of the CBC SoCG [REP5-037], pleas non-home-based workers are sufficiently precomposed								vithin loc pand on	al geogr	aphies?	In additio	on, as de	tailed at	row
		magnitu	ude/sens	sitivity crit	teria, am	ong othe	er matters	s, and the	e Applica	ant will re	flect the	outcome	ent and t es of thes elevant au	
		Some of the authorities are indicating that there are impacts at the local authority level that are not apparent at the functional market area level, and that when considered at local authority level these may require mitigation. The Applicant does not consider this to be the case and has not seen any evidence from the authorities in their submissions to date to suggest that there are likely to be significant adverse impacts that would require mitigation.												
				ssment fu arket area		•		vell as P	lanning F	Practice (Guidance	e on defi	ning ecor	nomic



		10-19	25%		14%	22%							22%	33%
		10-49		60%			53%	54%	36%	55%	49%	55%		
		20-49	27%		26%									
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SE.2.14	Applicant	The Ex this is a Please	A notes also refe confirm	renced ir	Applican row 2.1	9.1.9 of t ey result	I to a rec he CBC ts are to l	SoCG [F be used,	REP5-03 for exar	7]. nple is it	necessa	-	-	-/

		 Within ES Chapter 17: Socio-economics [APP-042] commuting is addressed in paragraphs 17.6.39-17.6.41 inclusive. The data quoted, sourced from both the 2011 Census and the 2019 Gatwick passholder database, are not used within the overall assessment and are presented to provide baseline context and to inform the definition of the Labour Market Area (LMA) only. The approach to estimating the number of jobs supported using unemployment rates and commuting data, as described at Paragraph 17.6.97, applies the labour force ratio rather than Census commuting data or passholder data. This is highlighted at Annex 2 of ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]. A comparison of the 2023 Staff Travel Survey shows a similar pattern of staff travel origin as observed in the 2011 Census data and the 2019 passholder database. The 75% threshold used by the ONS for defining Travel-to-Work Areas (see paragraph 17.4.11 of ES Chapter 17: Socio-economics [APP-042]) which was used to set the LMA boundary still holds when considering the 2023 Staff Travel Survey; 78.4% of staff surveyed lived within the LMA authority areas. Further, there are no significant changes to the proportion of staff residing in each of the 14 local authority areas in the LMA, and these remain the areas within which the greatest numbers of staff reside. Given the degree of alignment with the data used within ES Chapter 17: Socio-economics [APP-042], it is not considered necessary to update the assessment findings on the basis of the 2023 Staff Travel Survey.
SE.2.15	Horsham District Council	Cumulative assessment The ExA notes Horsham DC's continuing concern that the local impact on labour supply issues resulting from cumulative developments has not been adequately explored by the Applicant (Row 2.20.3.7 of [REP5-041]). In response to this, the Applicant has stated that a bottom-up cumulative assessment of construction activity over the next 10 years would show significantly more labour available than there is demand because most construction projects over that time period are not yet planned (Row 2.20.1.3 of [REP5-041]) and that construction employment detail is listed in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note [APP-199] and an assessment of effects provided is at different spatial levels including FEMA



		 is provided within Table 17.6.6 and Section 17.9 of ES Chapter 17 [APP-042]. Additionally, the Applicant has also provided a labour supply analysis at different spatial scales in Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]. Please can the Council confirm the specific inadequacies in the information provided to date and specify what assessment they consider necessary in respect of cumulative effects.
		N/A – this question is not directed at the Applicant.
SE.2.16	Applicant	Catalytic impact methodology
		The ExA notes the Applicant's response to ExQ1.SE.1.20 [REP3-103] and also the comments made in the CBC SoCG at row 2.19.2.1 [REP5-037] and the ESCC SoCG at row 2.19.3.1 [REP5-039]. It is noted that the Applicant stated they would be preparing a further explanatory note in respect of this matter.
		Please signpost to this note or advise by which deadline it will be received and the likely content.
		The Applicant is still discussing the methodology with the Joint Local Authorities and we hope to set the common position out in the updated Statements of Common Ground. However, the key issues of difference about the methodology are now understood and the Applicant is therefore able to submit the following explanatory note in response - Explanatory Note on Catalytic Employment (Doc Ref 10.55).