



Mole Valley District Council

**Principal Areas of Disagreement Summary  
Statement (PADSS)**

~~21 October 2023~~

~~25 March 2024~~ 21 August 2024

Mole Valley District Council (MVDC, 'the Council') has regularly engaged with Gatwick Airport Limited (GAL, 'the Applicant') throughout the pre-application stage and examination into ~~for~~ the Northern Runway Project (NRP) Development Consent Order (DCO).

This includes participation in engagement activities such as topic working groups (TWGs) and the submission of responses to formal public consultations. MVDC ~~has~~ will also be working with GAL on the preparation of a Statement of Common Ground (SoCG), with the final version required to be submitted by the Applicant at the Examining Authorities (ExA) Deadline 9 (21 August 2024), ~~however, this work has not yet taken place and at the time of writing is not intended to progress until late November 2023. As such, t~~ This Principal Area of Disagreement Summary Statement (PADSS) provides the final a ~~a~~ summary position for the Council ~~of these areas it considers to be unresolved and/or in dispute at this time~~ this late stage in the examination and is also being submitted at Deadline 9.

**Please note: outstanding issues are highlighted in 'Red', all other rows are either resolved, or no longer pursued but retained in the summary statement for the benefit of showing the extent of progress in discussions with the Applicant and through the examination.**

~~The Council anticipates detailing these further within relevant examination stages, including the Local Impact Report (LIR). The PADSS is provided for the benefit of the Examining Authority (ExA) to provide an early identification of the principle disagreeable matters and provide a clear focus for the examination and subsequent questions to be posed.~~

~~This list of issues represents the Council's position at this time and it is envisaged that these will be both resolved and added to as the examination progresses (see MV01).~~

### **Reference Table 1: Interpretation of column 'Likelihood of concern being addressed during Examination'**

<b><u>Grading</u></b>	<b><u>Why?</u></b>
<b><u>Likely</u></b>	<del>Where agreement should be possible, or a relatively simple change is required</del>
<b><u>Uncertain</u></b>	<del>Where an issue is being, or will be, discussed and could be resolved subject to necessary scrutiny and agreement.</del>
<b><u>Unlikely</u></b>	<del>Where agreement on an issue is unlikely, or it is difficult to see what a solution could be.</del>

<b>Principal Areas of Disagreement Summary Statement (PADSS) from:</b> <i>Mole Valley District Council (MVDC)</i>			<b>Version Number: Version 14</b> <b>Submitted at: 21 August 2024 27 October 2023</b>	
<b>Issue</b>	<b>Principal Issue in Question</b>	<b>Concern held</b>	<b>What needs to change/be amended/be included in order to satisfactorily address the concern</b>	<b>Final Position at Deadline 9 (End of Examination)</b>
<b>General</b>				
<b>MV01</b>	<b>Quality of documentation and impact on PADSS</b>  <b>Document Ref(s): General</b>	<p>The Applicant has consistently demonstrated an unwillingness to fully address the issues raised and the submitted documents are difficult to interpret in many cases including for the topics of noise, climate, transport and base case.</p> <p>There is a consistent lack of transparency with regard to key issues and this will necessitate a more fluid/iterative approach to how the Council will highlight principal areas of disagreement and engages in the examination process. For example, something which is not currently on the PADSS may need to be added as discussions evolve. Equally, an issue may come off the list where clear explanation and discussion resolves matters.</p>	MVDC fundamentally disagrees with the Applicant in numerous areas and it may be necessary to escalate clarifications or other areas of concern into the Council's PADSS as the process develops.	<b>Deadline 2 Update: No longer pursued</b>

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<b><u>Air Quality</u></b>				
MV02	<p><b>Lack of costing breakdown for AQ impacts and mitigation</b></p> <p><b>Document Ref(s): APP-038, APP-156, APP-042</b></p>	<p>The Applicant has provided insufficient information to detail how the health impacts from increased levels of air pollution have been calculated across the population as a whole or how costs will be shared, through mitigation mechanisms, with the wider community once they have been determined.</p> <p>Understanding costs is essential to effective and necessary mitigation and is claimed to have been considered under the Socio-Economic Effects of Chapter 17. However, there is no mention of such costs in Chapter 17 and these costings are not clearly and robustly set out.</p>	<p>Full and robust costs of impacts and mitigation needs to be carried out and published. These are not in Chapter 17 and therefore missing.</p>	<p><b><u>Deadline 2 Update: Matter resolved</u></b></p>
MV03	<p><b>Significance of construction and transport management plans</b></p>	<p>It is not currently clear how the impacts of both construction and transport will be offset/mitigated. To date, the information provided around</p>	<p>Construction and transport management plans must be prepared collaboratively with local and highways authorities and commenced swiftly so that the information is</p>	<p><b><u>Updated Position (Deadline 9, August 2024): A review of the Deadline 8 Submission ' 5.3 Environmental Statement Appendix 5.3.2 Code of Construction</u></b></p>

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	<p><b>Document Ref(s): General</b></p>	<p>how and when mitigation will be implemented is both high level and non-committal. It will be through the construction and management plans that authorities and communities can obtain assurance that the AQ impacts will be properly dealt with. To date, there has been no draft management plans which provide the necessary level of detail.</p>	<p>available for consideration during the examination. Should the DCO be approved in the absence of outline management plans, necessary scrutiny will not take place and implementation could fall short of what is necessary and appropriate.</p> <p><b>Deadline 2 Update:</b> Please note: For <u>all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567-page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that we are unable to update the resolution status or otherwise on air quality matters within the PADDs. This will be done at the next opportunity within the Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> The Joint Local Authorities have submitted detailed reviews of the GAL Dust Management Plan [No</p>	<p><b>Practice - Annex 9 - Construction Dust Management Strategy (CDMS) - Version 2 (Tracked)' [REP8-047] indicates that the majority of remaining changes required have been implemented. However, there remains two aspects of the updated CDMS that have not been addressed.</b></p> <p><b>The two aspects not addressed by the Applicant in the updated CDMS are the absence of a proactive approach to informing the Councils when there are dust complaints and the absence of an approach to share data in real time (or near real-time) for automatic particulate monitoring (e.g. Osiris monitoring). These are both points previously raised by the Councils in previous submissions e.g. [REP3-117] and the most recent technical working Group (5th July, 2024).</b></p> <p><b>It has also been noted that visual observations are listed to be undertaken on a weekly frequency (paragraph 5.7.1). It would be preferable if these were undertaken on a daily basis.</b></p>

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			<p><u>Examination Ref]. Please see REP4-053 for this detailed review. Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p> <p><u>Gatwick Airport Limited (GAL) sets out in paragraph 3.7.7 of their Response to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p>	<p><b><u>Additionally, it is noted that a review of the CDMP will be undertaken on a 3 monthly basis with any new controls to be agreed and implemented in a new strategy (paragraph 5.6.7). Text should be added to this paragraph to include reference to issuing of any new updated strategy to the local authorities for approval. Lastly, paragraph 5.8.3 identifies the possibility that unacceptable dust emissions occur despite additional mitigation measures. This paragraph should be strengthened to read 'In the event that unacceptable dust emissions continue, despite the additional mitigation measures, site operations will be modified in liaison with the local authority, and site operations temporarily suspended until the issue can be resolved.'</u></b></p> <p><b><u>On this basis, whilst the progress made with Applicant is welcome, the CDMS remains an area of disagreement. Further additions should be made to the CDMS to address these concerns.</u></b></p>

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MV04	<p><b>Clarification around air quality complaints procedure is needed</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>Paragraph 4.12.7 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice) identifies that a complaints procedure will be established but does not reference the sharing of complaints and resolution with local authorities. This measure is also identified within the site management air quality section as something that will be made available to local authorities.</p>	<p>The Applicant should provide the necessary information and the text should be amended to state that complaints information is provided to local authorities when complaints are received. The approach to complaints reporting and monitoring can be agreed in the Dust Management Plan.</p> <p><b><u>Deadline 2 Update: Please note: For all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567-page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that we are unable to update the resolution status or otherwise on-air quality matters within the PADDs. This will be done at the next opportunity within the Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</u></b></p> <p><b><u>Updated Position (Deadline 5 - May 2024):</u></b> The Joint Local Authorities</p>	<p><b><u>Updated Position (Deadline 9, August 2024): See update for MV03 which includes a description of the Councils unresolved request concerning the sharing of complaint information.</u></b></p>



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			<p><u>have submitted detailed reviews of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</u></p> <p><u>Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033]) further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p> <p><u>Gatwick Airport Limited (GAL) sets of 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.</u></p>	
MV05	<b>Need for the Dust Management Plan (DMP) to</b>	The monitoring portion of Section 5.8 (Environmental Statement: Appendix 5.3.2: Code of Construction Practice)	The DMP has not been prepared and should be developed during the examination and the Code of	<b><u>Updated Position (Deadline 9, August 2024): See update for MV03 concerning remaining CDMS matters.</u></b>

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	<p><b>be considered through the examination</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>suggests that further detailed plans are needed to design a DMP. This is not considered to be correct and a draft DMP can be developed with the information available at this time, with updates implemented as needed.</p>	<p>Construction Practice updated accordingly and linked with the DMP.</p> <p><b><u>Deadline 2 Update:</u></b> Please note: For all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567-page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that we are unable to update the resolution status or otherwise on-air quality matters within the PADDs. This will be done at the next opportunity within the Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</p> <p><b><u>Updated Position (Deadline 5 - May 2024):</u></b> 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><u>Without a response from GAL to the DMP review (and any updated DMP</u></p>	

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			<p><u>committed to by GAL for Deadline 5 [REP4-033] further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p>	
MV06	<p><b>Operational monitoring mechanisms need to be clear</b></p> <p><b>Document Ref(s): APP-082, APP-090</b></p>	<p>Operational monitoring will be very important to understand if changes in air quality are occurring or unacceptably worsening. There is no information in either the Air Quality chapter (Environmental Statement 5.1: Chapter 13) or the Surface Access Commitments document (Environmental Statement 5.3: Appendix 5.4.1) of how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored.</p> <p>Concerns remain that, as presented, key monitoring mechanisms and related management plans (i.e. Dust</p>	<p>Further liaison to agree the details of the S106 operational monitoring is suggested and on how this will be used to test the effectiveness of the Surface Access Commitments.</p> <p>Operation monitoring should form part of the examination discussions.</p> <p><b>Deadline 2 Update:</b> <u>Please note: For all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567-page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that we are unable to update the resolution status or otherwise on-air quality matters within the PADSS. This will be done at the next opportunity within the</u></p>	<p><u>Updated Position (Deadline 9, August 2024): The Council has concerns that if modal shift targets are not achieved or air quality standards were to change in future, the current controls within the DCO provide no mechanism to manage this uncertainty and would allow uncontrolled growth to continue even where breaches were occurring.</u></p> <p><u>The purpose of the Environmentally Managed Growth (EMG) Framework proposed by the JLAs is to introduce action thresholds (which align with LAQM guidance TG22) to identify where a risk of exceedance is likely. The EMG approach would be clearly linked to air quality monitoring.</u></p>

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		<p>Management Plan) are deferred for agreement outside of the application stage (e.g. S106) and would not be scrutinised or properly considered as part of the application.</p> <p>For example, operational phase monitoring is discussed in paragraphs 13.9.7 to 13.9.19 of the Environmental Statement. (Appendix 5.3.2: Code of Construction Practice). It is proposed by the Applicant that a S106 agreement is utilised to address the matter, rather than it forming part of the application which is being assessed. The Council suggests that this is done during the examination to ensure that monitoring is scrutinised and agreed in a timely fashion. Further details of the monitoring, locations, numbers of sites, techniques, funding and how air quality monitoring data will be evaluated against the predictions of the ES and the</p>	<p><u>Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <u>The Joint Local Authorities have submitted a detailed review of the Air Quality Action Plan [REP2 - 004]. Please see REP4-053 for this detailed review. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p> <p><u>Gatwick Airport Limited (GAL) sets of 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.</u></p>	<p><u>The Applicant argues this is unreasonable and tries to suggest that the JLAs are attempting to prevent planning consent on the basis of potential future change in air quality (which was the basis of the Stansted Airport appeal it cites) which is clearly not the case, since these thresholds would be implemented during operation of a consented development, and only if future legislative requirements were to result in risk of exceedance.</u></p> <p><u>The JLAs maintain that this approach is necessary because, there is no acknowledgement on the part of the Applicant of the possibility that air quality standards may change over the lifetime of the Project, and their draft AQAP provides inadequate controls to manage change including a retrospective 5 yearly reporting cycle.</u></p> <p><u>Construction Dust is discussed above in row MV03.</u></p>

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		Surface Access Commitments is not provided by the Applicant.		
MV07	<p><b>Ultra-fine particles need to be assessed and mitigated</b></p> <p><b>Document Ref(s): APP-038</b></p>	<p>The Applicant has had insufficient regard to the possible health impacts or levels of ultra-fine particles that could exist, specifically from aviation sources, but from other sources as well (i.e. transport). Ultra fine particles are a known issue with airports (DEFRA/Air Quality Expert Group) and when so many people live in proximity to the airport it seems an obvious thing to have assessed and considered fully. As written (13.2.5, Environmental Statement: Chapter 13 - Air Quality) the significance is underplayed and considered in a token manner in other sections.</p>	<p>MVDC requests that a proper assessment of ultra-fine particles is carried out to understand the possible health impacts and mitigated as necessary.</p> <p><u><b>Deadline 2 Update:</b> Please note: For all air quality matters further information has been provided by the Applicant at Deadline 1 including a 567-page technical note on air quality and a new version of Environmental Statement air quality figures. This information is currently being reviewed by our air quality specialists. This means that we are unable to update the resolution status or otherwise on-air quality matters within the PADSS. This will be done at the next opportunity within the Examination Timetable and separately in further communication with the Applicant. This applies to all points herein for air quality.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Joint Local Authorities</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b> The Applicant has agreed to an increase in funding for ultrafine monitoring, but not to implement this prior to standards being published and the funding will not cover all costs for equipment purchase or operation.</u></p> <p><u><b>Further funding and proactive monitoring in advance of standards should be undertaken to gather a set of baseline data. This monitoring is also needed to address the limitations associated with the assessment approach utilised within the ES [APP-038].</b></u></p>

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			<p><u>have submitted a detailed review of the Air Quality Action Plan [REP2 - 004]. Please see REP4-053 for this detailed review. Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</u></p>	
<p><b>Climate Change and Greenhouse Gas Emissions</b></p>				
<p><b>MV08</b></p>	<p><b>Over reliance on possible future technologies and lack of regard for cumulative impacts from other airspace/port changes</b></p> <p><b>Document Ref(s): APP-041, APP-045, APP-194</b></p>	<p>The Council does not consider the scenario testing for emissions robust or realistic as there is:</p> <ol style="list-style-type: none"> <li>1) A clear reliance on new technologies and supposed improvements in aviation when modelling emissions. Yet, there are no guarantees that these technologies will materialise or that the airlines with the ability to use them will operate out of Gatwick.</li> <li>2) Insufficient regard to the possible impacts of</li> </ol>	<p>Scenarios which consider new technologies, the status quo and a hybrid of old and new, along with other potential issues and risks need to be tested. Such an approach will give a 'full-spread' of possible emissions and impacts rather than a 'hope for the best' approach.</p> <p>Updated cumulative assessments are needed to factor in the necessary scenarios.</p> <p><u>Updated Position (Deadline 5 - May 2024): It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership</u></p>	<p><u>Updated Position (Deadline 9, August 2024): While the Council still has concerns around the prospect of new technologies coming forward, it considers that matters will be addressed through other elements of the examination through requirements and controls etc.</u></p> <p><u>As such, the Council notes the Applicant's position at this time and is content to no longer pursue this aspect independently.</u></p>

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		<p>wider London airport expansion plans and airspace change programmes.</p> <p>Both elements will cumulatively impact emissions and the approach taken by GAL is too singular and presents the best case scenario and not what will actually happen in reality.</p>	<p><u>of the steps that it must take to ensure emission reduction.</u></p> <p><u>Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, sensitivity testing should take place and a process of growth management should be in place should future technologies not come forward as intended.</u></p>	
MV09	<p><b>A more innovative and committed strategy to reducing emissions is needed</b></p> <p><b>Document Ref(s): APP-091</b></p>	<p>Appendix 5.4.2: Carbon Action Plan does not show sufficient commitment or provide an innovative solution to carbon emissions. Carbon offsetting should be a 'last resort' approach to managing emissions. The Council does not consider that the Applicant has gone far enough in seeking to reduce emissions. Coupled with a reliance on new, but uncertain technologies, it is likely that a greater reliance on less beneficial offsetting would be required.</p>	<p><u><b>Deadline 2 Update:</b> To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation.</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024): While the Council still has concerns around the Applicant's approach, it considers that matters should be addressed through mechanisms such as an Environmentally Managed Growth Framework and/or suitable requirements and controls etc.</b></u></p> <p><u><b>The Council is comfortable that these discussions are ongoing, but these are not resolved.</b></u></p>

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			<p><u>Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism.</u></p> <p><u>In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be:</u></p> <ul style="list-style-type: none"> <li><u>• additional in that would not have occurred in the absence of the project.</u></li> <li><u>• monitored, reported and verified.</u></li> <li><u>• permanent and irreversible</u></li> </ul>	



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			<ul style="list-style-type: none"> <li>• <u>without leakage in that they don't increase emissions outside of the proposed development</u></li> <li>• <u>Have a robust accounting system to avoid double counting and</u></li> <li>• <u>Be without negative environmental or social externalities.</u></li> </ul> <p><del>A more innovative approach and assessment of how to deal with emissions must be carried out.</del></p> <p><b>Updated Position (Deadline 5 - May 2024):</b><u>It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction.</u></p> <p><u>Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, it is the Council's view that a process of growth management should be in place, to ensure growth matches environmental impacts and can be offset accordingly.</u></p>	

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<b><u>MV42</u></b>	<u>If the Applicant does not provide infrastructure or services to help decarbonise surface transport emissions it may have the potential to result in the underreporting of the Proposed Development's impact on the climate. The full impact of the Proposed Development on the government meeting its net zero targets cannot be identified.</u>	<u>The Applicant must actively promote the transition to a decarbonised economy, incentivising airport users to adopt low-carbon technologies like electric cars and public transportation systems.</u>	<p><u>The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure.</u></p> <p><u>Additionally, to support this movement, the Applicant should support a Green Bus Programme such as the expansion of the network of hydrogen buses used in the Gatwick/Crawley area into Mid Sussex with accompanying infrastructure.</u></p> <p><b><u>Updated Position (Deadline 5 - May 2024):</u></b> <u>Surface Access matters remain under discussion as part of the wider examination and with the highway's authorities.</u></p> <p><u>It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction.</u></p>	<b><u>Updated Position (Deadline 9, August 2024):</u></b> <u>While the Council still has concerns around surface access in various ways, these are being raised and discussed by SCC as the Highways Authority for MVDC. As such, the Council is content to no longer pursue this aspect independently.</u>

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			<p><u>Information on sanctions and steps which will be taken by the government may not be effective. As such, it is the Council's view that a process of growth management should be in place, to ensure growth matches environmental impacts and can be offset accordingly.</u></p>	
<p><b>NEW: MV43</b></p>	<p>GAL does not identify the risks associated with using carbon offset schemes.</p>	<p><u>Document 5.4.2, Section 1.14</u></p> <p><u>This states that, "In 2016/17, we achieved 'Level 3+ - Neutrality' status under the Airport Carbon Accreditation scheme, which is a global carbon management certification programme for airports (Ref 1.1). GAL has been working hard to reduce carbon emissions under GAL's control (from a 1990 baseline) and offset the remaining emissions using internationally recognised offset schemes."</u></p> <p><u>The scientific community has identified various risks around using offsetting schemes to claim net zero or carbon neutrality. GAL should</u></p>	<p><u>GAL should state if they comply with the Airport Carbon Accreditation Offset Guidance Document which specifies the type of offsetting Schemes that need to be used.</u></p> <p><u>In addition, and where reasonably practical, GAL should seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be:</u></p> <ul style="list-style-type: none"> <li><u>• additional in that would not have occurred in the absence of the project</u></li> <li><u>• monitored, reported and verified</u></li> <li><u>• permanent and irreversible</u></li> </ul>	<p><b><u>Updated Position (Deadline 5 - May 2024):The Council welcomes the update that the Applicant it is looking into the development of a local carbon removal project and has nothing further to add on this matter and recognises climate change matters are being addressed more widely as part of the examination.</u></b></p>

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		<p><u>specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme.</u></p>	<ul style="list-style-type: none"> <li>• <u>without leakage in that they don't increase emissions outside of the proposed development</u></li> <li>• <u>Have a robust accounting system to avoid double counting and;</u></li> <li>• <u>Be without negative environmental or social externalities.</u></li> </ul>	
<b>Airspace Change</b>				
<p><b>MV10</b></p>	<p><b>Lack of consideration of FASI-S project and cumulative impacts</b></p> <p><b>Document Ref(s): APP-031, APP-245</b></p>	<p>Gatwick and Heathrow are undergoing an assessment of their airspace (FASI-S). Heathrow is slightly more advanced and has submitted its Stage 2 Initial Options Appraisal, with implementation between 2027-2029. GAL is also due to consult on options in early 2024 with implementation due to commence in 2027. GAL has suggested that it will be several years before the details of options are for the FASI-S airspace change are known. This is used as reasoning for not building in the options for sensitivity and</p>	<p>Sensitivity modelling should be carried out. It is understood that the modelling would not be exact to what is eventually implemented but would have regard to potential changes rather than simply ignoring it.</p> <p>If FASI is not to be sufficiently accommodated within the DCO proposals, any noise insulation scheme must be flexible enough to mitigate different impacts post FASI-S implementation.</p> <p><b><u>Updated Position (Deadline 5 - May 2024): The Applicant's attention is drawn to documents:</u></b></p>	<p><b><u>Updated Position (Deadline 9, August 2024): The Council's position remains unchanged and has not been convinced that the implications of FASI have been suitably considered.</u></b></p> <p><b><u>Attention is drawn to the previously reference Statement of Common Ground between GAL and the Joint Local Authorities on capacity and operations (Ref: 1.1.9 REP7-069).</u></b></p>

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		<p>scenario testing. This is not accurate. GAL has also sought to suggest that the DCO can progress without understanding the FASI options further and that it will be through the FASI process that environmental impacts can be addressed.</p> <p>This is a dismissive approach and should be considered, where possible, through the DCO.</p> <p>The Council is concerned that the Applicant is deferring any consideration of potential environmental impacts to the Civil Aviation Authority (CAA) and the FASI process and has not included airspace change within the DCO assessment process. Consequently, in-combination effects are of concern to the Council.</p>	<ul style="list-style-type: none"> <li>• <a href="#">10.1.18 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Capacity and Operations; and</a></li> <li>• <a href="#">10.1.19 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Forecasting and Need</a></li> </ul>	
<b><u>Noise and Vibration</u></b>				
<b>MV11</b>	<b>2032 assessment year is assessed as a</b>	The assessment of air noise utilises 2032 which is identified as the worst-case in noise terms when compared to the base	The Applicant must identify significant effects during all assessment years to understand how communities would be affected by	<b><u>Updated Position (Deadline 9, August 2024): MVDC are disappointed the Applicant has chosen not to provide the required</u></b>

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	<p><b>worst-case scenario, but there should be a yearly breakdown</b></p> <p><b>Document Ref(s): APP-172, APP-180</b></p>	<p>case of 2019 (Environmental Statement Appendix 14.9.2). However, identification of significant effects for all assessment years should be provided. The absence of this does not present a transparent account and is misleading. Identification of all years also enables a proper consideration of the level of mitigation that should be carried out and enable consistent monitoring.</p>	<p>noise throughout the project lifespan. This is particularly relevant to changes in the number of events generating a maximum noise level greater than 60db (N'Above) at night, or additional awakenings (being woken in the night by noise) across the population.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Applicant's attention is drawn to documents:</u></p> <ul style="list-style-type: none"> <li>• <u>10.1.18 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Capacity and Operations; and</u></li> <li>• <u>10.1.19 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Forecasting and Need</u></li> </ul>	<p><u><b>information. An ES provide a temporal assessment of effects, so they are understood throughout the project lifespan and not just during the worst-case year. MVDCs position is that a full assessment of effects and secondary noise metrics should be provided for each assessment year.</b></u></p>

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MV12	<p><b>Overheating</b></p> <p><b>Document Ref(s): APP-180</b></p>	<p>There is no adequate assessment of overheating and the necessary performance of ventilation to ensure a comfortable internal environment. Local authorities have requested an 'Overheating Assessment' to demonstrate adequacy of the ventilation scheme. This has not been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications.</p>	<p>A suitable overheating assessment and sensitivity check against the necessary ventilation requirement's required to keep windows close. The chartered institute of Building Services engineers (CIBSE) offers guidance on overheating assessments and the minimum standard that should be used is DSY2 which uses summer data to 2050 and is more future proof than DSY1 (2011 to 20240) (<a href="https://www.cibse.org/policy-insight/position-statements-and-briefings/overheating-position-statement">https://www.cibse.org/policy-insight/position-statements-and-briefings/overheating-position-statement</a>)</p> <p><b>Deadline 2 Update:</b> <a href="#">The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <a href="#">MVDC position remains and is unchanged.</a></p>	<p><b>Updated Position (Deadline 9, August 2024):</b> <a href="#">MVDC maintain its position on this matter.</a></p>
MV13	<p><b>Eligibility for air Noise Insulation Scheme (NIS)</b></p> <p><b>Document Ref(s): APP-180</b></p>	<p>The scheme assesses noise impacts based on average summer LAeq contour levels and the Council considers that this does not meet policy requirements and does not</p>	<p>Single mode contours, for summer operation, should be used to determine eligibility for noise insulation. The Council understands that there is precedent for this and has recently been required as part of</p>	<p><b>Updated Position (Deadline 9, August 2024):</b> <a href="#">MVDC maintain its position that single mode contours are an important aspect in understanding effects of the proposed expansion and the</a></p>

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		sufficiently protect against health impacts.	<p>the Luton Airport Expansion Project DCO application (TR020001).</p> <p><u>Deadline 2 Update:</u> The Applicant is referred to the Joint Surrey Council's <u>Local Impact Report for more detailed information.</u></p> <p><u>Updated Position (Deadline 5 - May 2024):</u> MVDC maintain their position on this matter</p>	<p><u>Applicant should provide this information and take it into account when formulating the noise insulation scheme.</u></p> <p><u>MVDC also consider the proposed requirements in the ExA's proposed schedule of changes to the draft DCO [PD-028] in relation to insulating out to the 48dBA LAeq 8 hour night and a bespoke noise insulation design document would contribute to the resolution of this issue.</u></p>
MV14	<p><b>Measurement of ground noise to identify eligibility needs to be clear and robust</b></p> <p><b>Document Ref(s): APP-180</b></p>	<p>Paragraph 1.1.3 (Environmental Statement: Appendix 14.9.10 – Noise Insulation Scheme) suggests that eligibility for the NIS will be on the basis of "...air noise levels predicted with the operation of the Northern Runway...". However, paragraph 4.1.11 suggests that "...Eligibility for the Inner Zone scheme noise insulation package due to ground noise will be established on the basis of measurements of levels of ground noise carried out after the Project is operating."</p>	<p>Eligibility should be established in all cases on the basis of prediction not noise monitoring after the fact.</p> <p>APP-180 and relevant implementation document should be amended accordingly to secure the best mitigation against negative health impacts.</p> <p><u>Deadline 2 Update:</u> The Applicant is referred to the Joint Surrey Council's <u>Local Impact Report for more detailed information.</u></p>	<p><u>Updated Position (Deadline 9, August 2024):</u> MVDC maintain its position on this matter. <u>Without ground noise contours we consider it is not possible to suitably predict and mitigate impacts over the lifetime of the scheme with each year.</u></p> <p><u>Suitable advanced consideration of construction noise at sensitive locations as recommended in the JLA and JSC reps [REP7-110] and Joint Local authority responses to ExQ-2 [REP7-111] and [REP7-110] will deal with the likely levels of</u></p>



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		<p><u>Some properties now qualify for round noise insulation on the basis of predictions. Ground noise predictions should be used at all properties to identify eligibility for insulation so insulation can be provided before significant effects occur. The ground noise insulation scheme should also extend to the Outer Zone</u></p> <p><del>This seems somewhat contradictory and all eligibility should be on the grounds of prediction to increase certainty.</del></p>	<p><u>Updated Position (Deadline 5 - May 2024):</u> MVDC's position is that properties should be mitigated before significant effects occur so relying on monitoring as a means to determine eligibility for insulation is not appropriate.</p>	<p><u>intrusive noise and, should these recommendations be accepted by the ExA, then these matters will be suitably resolved.</u></p>
MV15	<p><b>Commencement of Eligibility</b></p> <p><b>Document Ref(s):</b> <b>Condition 18 of APP-006, APP-180</b></p>	<p>It is unclear when noise insulation will be provided to residents impacted by ground and construction noise. There is insufficient and imprecise details preventing the Council from being able to understand the extent that mitigation of this type will be achieved.</p>	<p>In accordance with other large construction schemes, MVDC considers that details of how the Noise Insulation Scheme will be promoted and administered to those properties predicted to be eligible, should be provided within 12 months of permission if granted.</p> <p><u>Deadline 2 Update:</u> The Applicant is referred to the Joint Surrey Council's <u>Local Impact Report</u> for more detailed information.</p>	<p><u>Updated Position (Deadline 9, August 2024):</u> MVDC maintain its position on this matter. <u>Without ground noise contours we consider it is not possible to suitably predict and mitigate impacts over the lifetime of the scheme with each year.</u></p> <p><u>Suitable advanced consideration of construction noise at sensitive locations as recommended in the JLA and JSC reps [REP7-110] and Joint Local authority responses to</u></p>

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			<p><u>Updated Position (Deadline 5 - May 2024): Properties in the ground noise outer zone should qualify for insulation. Details should be provided on the process of monitoring eligibility for ground noise compensation and the triggers for noise monitoring.</u></p>	<p><u>ExQ-2 [REP7-111] and [REP7-110] will deal with the likely levels of intrusive noise and, should these recommendations be accepted by the ExA, then these matters will be suitably resolved.</u></p>
MV16	<p><b>The Code of Construction Practice (COCP) provides insufficient noise monitoring control and management of both long term work areas where (i) receptors will be exposed to intrusive noise for significant periods of time and (ii) areas of short term high impact events predicted to approach the</b></p>	<p>Paragraph 5.9.15 of the Environmental Statement (Appendix 5.3.2: Code of Construction Practice), states that noise monitoring will be carried out to confirm the best practicable means. There is, however, insufficient information within the CoCP to identify areas of high noise impacts in advance of the construction work beginning.</p> <p>It is not acceptable to leave site specific monitoring to be determined in the Section 61.</p> <p>Policy requires adverse impacts to be mitigated and reduced. MVDC does not consider there to be sufficient support for contractors to assist them</p>	<p>The Council expects the CoCP to clearly identify the areas of greatest adverse impacts and where work is considered to be significantly above the Lowest Observed Adverse Effect Level (LOAEL) for an extended period of time (to be agreed) the Applicant is expected to offer an enhanced commitment to monitoring including, but not limited to, continuous monitoring.</p> <p>For these sites the CoCP should be clear what types of noise and other environmental monitoring are expected to be provided by the main contractor. Different risk scenarios should be defined by the promoter and the quality and quantity of monitoring considered in advance. The qualification and specialist knowledge of the monitoring team</p>	<p><u>Updated Position (Deadline 9, August 2024): This matter is not agreed as per MVDCs Deadline 5 response (REP5-101, MV16). The Section 61 process is not a reliable way of securing mitigation as it allows significant effects to occur.</u></p>

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	<p><b>Significant Observed Adverse Effect level (SOAEL)</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>in demonstrating that they are managing and mitigating noise and other environmental impacts, such as vibration and dust (where appropriate).</p>	<p>should scale proportionately with the risk and there should be an independent oversight and complaints system outside of the contractors and the airport.</p> <p>On highest risk and most intrusive sites (e.g. 24 hour works compounds), the Council will expect continuous noise monitoring to be provided with suitable noise targets to be brought forward to mitigate and minimise adverse impacts at nearby sensitive residential receptors.</p> <p>Suitable systems for logging and managing complaints and reporting environmental performance should also be provided.</p> <p><b><u>Deadline 2 Update:</u></b> <u>The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><b><u>Updated Position (Deadline 5 - May 2024):</u></b> <u>Mole Valley does not accept the Section 61 process and the CoCP [REP4-008] requires sufficient advanced consideration of impacts and the Applicant is referred back to</u></p>	

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			<p><u>earlier comments in the Surrey LIR [REP1-097] and subsequent submissions.</u></p> <p><u>MVDC contend there is insufficient detail/commitments in the current the COCP to act as a meaningful outline document for future contractors in addressing their construction impacts.</u></p>	
MV17	<p><b>Core Working Hours are unacceptable and inadequately defined, result in unacceptable disturbance from intrusive noise</b></p> <p><b>Document Ref(s): APP-082</b></p>	<p>Paragraph CoCP states: "Outside the airport boundary, the core working hours will be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 07:00 to 13:00 on Saturdays."</p> <p>These hours are considered to be unacceptable and would result in unacceptable disturbance from intrusive noise.</p>	<p>The undertaker needs to define shoulder periods which typically it would be expected to be 07:00 to 08:00 and 18:00 to 19:00 from which noisy activities will be excluded.</p> <p>Given the Control of Pollution Act 1974 (CoPA) and Environmental Protection Act 1990 (EPA) and the duration of the project, there would seem to be a strong argument to encourage the amended approach.</p> <p><u>Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated Position (Deadline 5 - May 2024): Additional information is accepted but the text provided needs</u></p>	<p><b><u>Updated Position (Deadline 9, August 2024): This matter is not agreed as per MVDCs Deadline 5 response. MVDCs position is that the definition of mobilisation needs to be updated in line with the Thames Tideway project as follows:</u></b></p> <ul style="list-style-type: none"> <li>- <b><u>Mobilisation upto 1 hour before and after core hours, with mobilisation activities defined as set out below. Note Mobilisation does NOT include lorry movements into or out of sites.</u></b></li> <li>- <b><u>Timings and definition of mobilisation need to be updated in Code of construction practice. As</u></b></li> </ul>

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			<p><u>to be mirrored in the COCP and it should be clear that HGV movements are not acceptable during the shoulder periods.</u></p> <p><u>The Applicant is referred to paragraph 12.87 of the Surrey LIR [REP1-097].</u></p> <p><u>Core working hours should be updated as 08:00-18:00 Monday to Friday and 09:00-12:00 on Saturday. Shoulder hours should be defined as the periods one hour before and one hour after the core working hours. A commitment should be included in the CoCP that restricts heavy vehicle movements during the shoulder hours.</u></p>	<p><b><u>set out in [REP1-100] p45 / 46 with mobilisation defined (as in the Thames Tideway Project) as:</u></b></p> <p><b><u>Arrival and departure of the workforce at the site and movement to and from places of work (if parked engines shall be turned off and staff shall be considerate towards neighbours with no loud music or raised voices); general refuelling (from jerry cans only, use of fuel tractors and bowsers shall be limited to standard working hours); site inspections and safety checks, site meetings (briefings and quiet inspections / walkovers); site clean up (site house keeping that does not require the use of plant); site maintenance; and low key maintenance and safety checking of plant and machinery (providing this does not require or cause hammering or banging, etc). Mobilisation does NOT include lorry movements into or out of sites.</u></b></p>
MV18	Identification of significant	It is acknowledged that minor increases in road traffic noise is expected on Charlwood Road	Clarify the expected levels at the properties (based on the Basic Noise Level already calculated) to either:	<b><u>Updated Position (Deadline 9, August 2024): The Applicant has not addressed this matter.</u></b>

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	<p><b>effects regarding traffic</b></p> <p><b>Document Ref(s): APP-171, General</b></p>	<p>and Ifield Avenue. These impacts are stated as not significant but they could be if absolute levels at the properties are above the SOAEL.</p> <p>The Council notes that later in the construction process there is significant related activity and concern is raised that this is not accompanied by robust traffic modelling. Such uncertainty also extends to concerns around the validity of transport modelling more generally. Should the modelling need to be re-run noise levels will again need to be reviewed.</p>	<p>1) demonstrate levels are below SOAEL and therefore the conclusion of no significant effects can be justified, or</p> <p>2) to acknowledge potential significant effects.</p> <p>The Applicant should be required to carry out a further assessment of construction transport management in 2029 to review and improve transport management practices.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Applicant has not addressed this matter.</u></p>	<p><u><b>Attention is drawn to the consideration of construction noise at sensitive locations recommended and set out in the JLA and JSC reps REP7-110 and Joint Local Authority responses to ExAQ-2, REP7-111 and REP7-110.</b></u></p>
MV19	<p><b>No attempt has been made to expand on the assessment of likely significant effects through the use of</b></p>	<p>Context is provided to the assessment of ground noise through consideration of the secondary L<sub>Amax</sub> (maximum sound level), overflight, L<sub>den</sub> (average all day noise) and L<sub>night</sub> (average night time</p>	<p>The Council would like to see monthly movement data for the various scenarios as well as hourly movement data for annual movements by departure and arrival. This includes</p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b></u>  <u><b>MVDCs position remains that the Applicants ground noise assessment is inherently flawed and cannot be relied upon. The Applicant has made no attempt to</b></u></p>

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	<p><b>secondary noise metrics</b></p> <p><b>Document Ref(s): APP-172, General</b></p>	<p>noise) noise metric. However, no conclusions on how this metric relates to likely significant effects have been made so the use of secondary metrics in terms of the overall assessment of likely significant effects is unclear.</p> <p>There is also concern over the time period for Lden as GMT appears to be used when local time should be consistently applied.</p>	<p>that for the periods within and outside of the summer.</p> <p>If there becomes a significant disconnect between the summer period and other times of peak demand then MVDC contends that the summer impact is no longer representative. There is currently insufficient relevant information provided to enable understanding of the impacts.</p> <p>The Applicant needs to provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant identifying a significant effect.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Applicant should clearly set out their methodology for the use of Lmax when identifying significant effects.</u></p>	<p><u><b>address any concerns or consult on how these concerns may be addressed.</b></u></p>

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MV20	<p><b>Noise impacts from 'end-around' runways need sufficient consideration</b></p> <p><b>Document Ref(s): APP-173, APP-176</b></p>	<p>The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate effectiveness.</p> <p>Details on ground noise model inputs, including source and bund locations, should be provided. While the Applicant suggests it has sought to address this issue following comments made in the pre-application and consultation stages, the Council does not agree and future impacts have been considered or will be mitigated.</p>	<p>Further commentary and detailed assessments must be provided as part of the examination process to demonstrate the design and performance of the proposed barriers throughout all the years of the development.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> Engine ground running, auxiliary power unit, fire training ground activities and engine around taxi noise should all be included in LAeq,T ground noise predictions.</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b> MVDCs position remains that the Applicants ground noise assessment is inherently flawed and cannot be relied upon. The Applicant has made no attempt to address any concerns or consult on how these concerns may be addressed.</u></p> <p><u><b>The engine ground run assessment issues could be addressed through a commitment that there would be no ground running activities at the western end of the Juliet runway during the period when the existing bund has been removed and he replacement barrier/bund fully built.</b></u></p> <p><u><b>MVDC still expects a commitment to provide ground noise contours to help understand and manage these impacts.</b></u></p>
MV21	<p><b>For engine ground running activities, the LAmax assessment does not</b></p>	<p>The assessment only accounts for the worst-case location (Rowley Cottages) and contextualises the 82 dB LAmax predictions by identifying car pass-by LAmax levels of 80dB.</p>	<p>LAmax engine ground running (EGR) noise levels should be contextualised at all receptor locations where the daytime LAmax exceeds 65 dB.</p> <p>As a minimum, the LAmax impacts on</p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b> MVDC's position is that the ground noise assessment does not adequately assess effects during the period when there will be no</u></p>



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	<p><b>adequately cover all sensitive receptor locations</b></p> <p><b>Document Ref(s): APP-173, APP-176</b></p>	<p><u>Engine ground running LAmox noise is contextualised by comparing it to LAmox noise from aircraft taxiing. It is not appropriate to assess ground noise sources using different metrics then contextualise them against each other. The ground noise assessment should cover LAeq,T noise predictions that include engine ground running, auxiliary power unit, fire training ground activities and engine around taxi noise</u></p> <p><del>However, there is no attempt to contextualise LAmox engine ground running noise at any other receptor location.</del></p>	<p>the closest adversely effected receptors must be provided in particular but not limited to:</p> <ul style="list-style-type: none"> <li>• Charlwood (receptor 2)</li> <li>• Brook Farm (receptor 3)</li> <li>• Bear and Bunny (receptor 4)</li> <li>• Hyders Farmhouse (receptor 9) &amp;</li> <li>• Myrtle Cottage (receptor 10)</li> </ul> <p>In addition, the assessment must include the estimated frequency and duration of these runs.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The logic that aircraft taxiing noise LAmox noise levels are high so ground running noise LAmox noise levels are not significant is inherently flawed.</u></p>	<p><u><b>barrier/ bund in place to screen ground activities.</b></u></p> <p><u><b>MVDC would welcome a commitment that is secured in the DCO to minimise engine ground running on taxiways Juliet and Yankee which are closest to residential receptors.</b></u></p> <p><u><b>The Applicant are reminded of the representation in the JSC REP4-054 which considers the Applicant's ground noise response to PD-012 Examining Authorities written questions (EXA Q1) and the discussion in ISH9 where the Applicant was asked to consider these issues in further detail. The JLAs are proposing a ground noise requirement as part of the DCO which is supported by MVDC.</b></u></p>
MV22	<p><b>Prevention of breaches in the Noise Envelope</b></p>	<p>Throughout the Noise Expert Group (NEG) led community consultations and up until November 2022, the Applicant stated there would be an action</p>	<p>Suitable action levels (noise limits) should be agreed.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024): MVDC support the JLAs submission for an Environmentally Managed Growth Framework [REP4-050] and ExA</b></u></p>

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	<p><b>Document Ref(s): APP-177</b></p>	<p>level (noise limit) which would be provided to enable and guide the enforcement mechanism. This has not occurred.</p>	<p><u>Local Impact Report for more detailed information.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded.</p>	<p><b>requirements set out in the ExA's proposed schedule of changes to the draft DCO [PD-028].</b></p>
<p><b>MV23</b></p>	<p><b>Night-time Noise limit</b></p> <p><b>Document Ref(s): Condition 14 of APP-006, APP-177</b></p>	<p><u>Gatwick have night noise controls as part of their status as a designated airport and these controls relate to the summer and winter night periods. However, there is no guarantee that these controls would be retained if their designated status changed or DfT changed their approach to night noise controls.</u> The Noise Envelope does not make necessary attempts or provisions to restrict nighttime movements.</p>	<p>The final permission must, as a minimum, replicate the current Department for Transport nighttime movements controls.</p> <p><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> Gatwick have night noise controls as part of their status as a designated airport and these controls relate to the summer and winter night periods. However, there is no guarantee that these controls would be retained if their designated status</p>	<p><b>Updated Position (Deadline 9, August 2024):</b> MVDC maintain its position on this matter without night noise controls there is a risk of significant adverse impact to health and wellbeing outside of the 92 day summer period.</p>

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			<p><u>changed or DfT changed their approach to night noise controls. A commitment should be made in the DCO to retain and maintain these controls.</u></p> <p><u>A commitment should be made in the DCO to retain and maintain existing night noise controls.</u></p>	
MV24	<p><b>Insufficient consideration of mechanisms for the prevention of breaches in the Noise Envelope</b></p> <p><b>Document Ref(s): Condition 14 of APP-006, APP-177</b></p>	<p>It has not been possible to identify any mechanisms in the Application documents that provide a proactive plan which manage and prevent exceedances. Nor is there any detail on what proposed actions or mitigation might take place to achieve compliance in the event of a forecast breach.</p> <p>Currently two consecutive retrospective breaches are required before capacity restrictions are proposed.</p>	<p>More detail should be provided on:</p> <ol style="list-style-type: none"> <li>1) proactive measures to prevent breaches; and</li> <li>2) when/what measures would be taken to avoid a likely breach.</li> </ol> <p>Action plans must be in place before a breach of the noise contour area limit occurs and the Applicant must give more thought and commitment to this.</p> <p>The controls in the DCO detailed under condition 15 need to be aligned with the final Noise Envelope document, once approved.</p> <p><u>Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's</u></p>	<p><u>Updated Position (Deadline 9, August 2024): MVDC support the JLAs submission for an Environmentally Managed Growth Framework [REP4-050] and ExA requirements relating to this matter discussed at ISH9, and subsequent ExA requirements set out in the ExA's proposed schedule of changes to the draft DCO [PD-028].</u></p> <p><u>Although independent verification has been resolved (MV26) MVDC still considers that there need to be powers to require information to support understanding of this process. Suggestions made to the wording of the DCO to ensure authority input was made through REP7-108. REP8-118, set out the Applicants response to suggested</u></p>

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			<p><u>Local Impact Report for more detailed information.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> MVDC maintain their position. <u>There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded.</u></p>	<p><b>amendments to draft requirements and were opposed.</b></p>
MV25	<p><b>Independent forecasting should involve relevant local authorities</b></p> <p><b>Document Ref(s): Condition 14 of APP-006, APP-177</b></p>	<p>Any independent forecasting that needs to take place must ensure the involvement of relevant local authorities. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.</p>	<p>The Applicant and the local authorities should agree a pool of suitable aviation forecasting companies that are capable of carrying out this work. Once the contractor has been appointed by the local authorities, this work should be funded by the Applicant.</p> <p><b>Deadline 2 Update:</b> <u>The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> MVDC maintain their position. <u>There is no evidence that forecasts can reliably predict what actually</u></p>	<p><b>Updated Position (Deadline 9, August 2024):</b> <u>MVDC support the JLAs submission for an Environmentally Managed Growth Framework [REP4-050] and ExA requirements relating to this matter discussed at ISH9, and subsequent ExA requirements set out in the ExA's proposed schedule of changes to the draft DCO [PD-028].</u></p> <p><b>Powers to require information will be required to support understanding of this process and a confidentiality mechanism will need to be agreed.</b></p>

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			<p><u>happens in reality. Noise controls should have a forward-looking component that can be applied during scheduling to provide confidence that noise limits would not be exceeded.</u></p>	
MV26	<p><b>Independent verification</b></p> <p><b>Document Ref(s): Condition 14 of APP-006, APP-177</b></p>	<p>Any review of the air noise modelling and associated works must be independently verified. If left solely to the CAA, it is unlikely that they will be provided with a wide enough brief to challenge the internal Gatwick systems.</p>	<p>The Applicant should fund an independent review of the air noise modelling, associated works and noise monitoring. This should be carried out at five-yearly intervals as a minimum.</p> <p><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</p> <p><b>Updated Position (Deadline 5 - May 2024):</b> Information is accepted.</p>	<p><b>Updated position (Deadline 9, August 2024):</b> <u>Although independent verification has been resolved MVDC still considers that there need to be powers to require information to support understanding of this process.</u></p> <p><u>Although independent verification has been resolved (MV26) MVDC still considers that there need to be powers to require information to support understanding of this process. Suggestions made to the wording of the DCO to ensure authority input was made through REP7-108. REP8-118, set out the Applicants response to suggested amendments to draft requirements and were opposed.</u></p>
MV27	<p><b>Capacity declaration restrictions as a</b></p>	<p>Section 7.3 of the Environmental Statement (Appendix 14.9.7: Noise Envelope) sets out</p>	<p>Slot restriction measures should be adopted in the event of a breach being</p>	<p><b>Updated Position (Deadline 9, August 2024):</b> <u>MVDC support the JLAs submission for an</u></p>

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	<p><b>means of managing aircraft noise.</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>intended measures to restrict capacity declarations. However, these measures would not prevent new slots being allocated within the existing capacity. Neither are they an effective means of preventing future noise contour limit breaches, especially if a breach occurred in the previous year.</p>	<p>identified for the previous year of operation.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> Capacity restrictions are not sufficient to prevent potential breaches and slot restriction measures should be adopted.</u></p>	<p><u><b>Environmentally Managed Growth Framework [REP4-050] and ExA requirements relating to this matter set out in the ExA's proposed schedule of changes to the draft DCO [PD-028].</b></u></p>
<p><b>MV28</b></p>	<p><b>Prevention of breaches in the Noise Envelope</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the Noise Envelope.</p>	<p>Adopt a set of thresholds that trigger preventative action. This would allow an action plan to pre-empt a breach.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> MVDC maintain their position. There is no evidence that forecasts can reliably predict what actually happens in reality. Noise controls should have a forward-looking component that can be applied during</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b> MVDC support the JLAs submission for an Environmentally Managed Growth Framework [REP4-050] and ExA requirements relating to this matter set out in the ExA's proposed schedule of changes to the draft DCO [PD-028].</u></p>

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			<p><u>scheduling to provide confidence that noise limits would not be exceeded.</u></p>	
MV29	<p><b>Slow case fleet transition (replacing older aircraft with newer, quieter ones) is not an acceptable basis for setting the Noise Envelope</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>This issue has been previously raised by the Council and the Applicant. In its Issues Tracker (Application Document(s): Response to PD005), the Applicant considers this to have been resolved. MVDC does not agree and slow case transition continues to be considered unacceptable.</p> <p>There is no adequate comparison of future technology gains within the 2019 baseline and noise levels have been assumed to be constant within the fleet over the next ten years. Using the slow transition case, as the basis of the Noise Envelope, provides no incentive for GAL to seek faster fleet transition and secure noise and other environmental benefits. The central case should be utilised and a more proactive approach taken by the Airport.</p>	<p>The central case transition is considered to be more representative and should be supported by the Airport to limit environmental impacts.</p> <p>Forecasts and necessary assessment work should be amended accordingly in order to balance the impacts of growth.</p> <p><u><b>Deadline 2 Update:</b> The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Applicant's method for sharing the benefits is flawed as it allows for a substantial increase in noise contour area in the 2032 daytime period over the 2019 baseline. It is hard to understand how it can be justified that any benefits of new aircraft technology have been shared with the local community in this case.</u></p>	<p><u><b>Updated Position (Deadline 9, August 2024):</b> The Applicant has still not modelled 284,987 ATMs in 2029 i.e. the baseline scenario where no growth in the 2019 movements occurs, despite this approach being in line with the Planning Inspectorate Scoping Report (para 2.3.13 Appendix 6.2.2 [APP-095]) which states:</u></p> <p>- <u><i>"The ES should also give consideration to the prospect of a 'no development' and 'no growth scenario' for comparative purposes and in support of the justification for the Proposed Development in the form that is to be presented in the DCO application"</i></u>.</p> <p>- <u><b>It is noted that the applicant failed to provide this information:</b></u></p> <p>i) <u>in its Scoping Response to PINS set out in 2.3.11 of Appendix 6.2.3 [APP-096].</u></p> <p>ii) <u>In response to the Surrey Local Impact Report -</u></p>

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				<p><u><a href="#">Appendix C: Noise and Vibration District and Borough Profiles [REP1-100].</a></u></p> <p><u><a href="#">In its response opposite (connected to the updated central case) it appears to be using the forecast ATM movements in 2029 with 2019 technology, which is the reverse of the question being asked here.</a></u></p>
MV30	<p><b>Flexibility of noise contours limits accountability for airspace redesign and future aircraft technology</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>The Applicant is seeking the flexibility to increase noise contour area limits, depending on airspace redesign and noise emissions from new aircraft technology. Should the NRP obtain consent, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope to ensure that unacceptable alterations are contained as far as is reasonably possible.</p>	<p>There should be no allowance for the Noise Envelope limits to increase</p> <p><u><a href="#">Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></u></p> <p><u><a href="#">Updated Position (Deadline 5 - May 2024): MVDC maintain their position that there should be no allowance for Noise Envelope limits to increase.</a></u></p>	<p><u><a href="#">Updated Position (Deadline 9, August 2024): MVDC maintain its position on this matter.</a></u></p>
MV31	<p><b>CAA to regulate the Noise Envelope rather</b></p>	<p>There is no mechanism for local authorities to review Noise Envelope reporting or take</p>	<p>A mechanism should be included to allow the host authorities to scrutinise Noise Envelope reporting and take</p>	<p><u><a href="#">Updated Position (Deadline 9, August 2024): MVDC maintain its position on this matter.</a></u></p>



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	<p>than relevant local authorities</p> <p>Document Ref(s): APP-177</p>	<p>action against limit breaches or review any aspects of the Noise Envelope.</p> <p><del>To date, the CAA has not accepted a role regulating the Noise Envelope</del></p>	<p>action in the case of any breaches. Community representation should also be considered and positive examples of this are those in the Luton Environmental Scrutiny Group.</p> <p><u>Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated Position (Deadline 5 - May 2024): MVDC are of the opinion that the joint local authorities should be part of a Noise Envelope scrutiny group.</u></p>	
MV32	<p>Modelling 2019 Air Transport Movements (ATM) with 2032 fleet technology</p> <p>Document Ref(s): APP-177</p>	<p>Sensitivity testing of different growth rate scenarios (Appendix 14.9.7 The Noise Envelope) would help provide a better understanding of how noise may affect local communities in the future. The Council has consistent requested such testing to be carried out up to and including 2032, yet it has been argued that this is too far in advance to be material. The Council disagrees and this</p>	<p>Sensitivity testing for the longer term should be carried out.</p> <p><u>Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated Position (Deadline 5 - May 2024): MVDC maintain their position on this matter</u></p>	<p><u>Updated Position (Deadline 9, August 2024): MVDCs position is that the original Central Case represents the most likely forecast of future fleets.</u></p>

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		<p>would be only eight years in the future.</p> <p>Furthermore, various other data has been modelled to 2032 and beyond, without issue, and it is unclear why this sensitivity testing has not been provided within the relevant Environmental Statement.</p>		
MV33	<p><b>Annual noise contour limits are necessary to understand the overall impacts from air traffic movements</b></p> <p><b>Document Ref(s): APP-177</b></p>	<p>The noise contour area limits provided relate only to the 92-day summer period. There should be additional noise contour area limits in place to control growth during periods of the year outside the 92-day summer period. Use of the summer average LAeq is not representative of the intrusive noise experienced by residents impacted by aircraft noise and should be more broadly considered to be representative.</p>	<p>Representative annual noise contour limits should be more widely considered and included in the Noise Envelope.</p> <p><u>Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</u></p> <p><u>Updated Position (Deadline 5 - May 2024): Gatwick have night noise controls as part of their status as a designated airport and these controls relate to the summer and winter night periods. However, there is no guarantee that these controls would be retained if their designated status changed or DfT changed their approach to night noise controls. A</u></p>	<p><u>Updated Position (Deadline 9, August 2024): MVDC feel strongly that there needs to be a commitment in the DCO to retain and maintain DfT night noise controls should DfT night noise controls or Gatwick's designated airport status change in future.</u></p>

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			<p><a href="#">commitment should be made in the DCO to retain and maintain these controls.</a></p>	
MV34	<p><b>Failure to properly implement the Government's policy on Noise Envelopes (CAP1129)</b></p> <p><b>Document Ref(s): App-039</b></p>	<p>Various national aviation guidance and policy refer to an approach where there should be a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development.</p> <p>Sharing benefits is a fundamental part of the Noise Envelope and it should be demonstrated how the benefits of new aircraft technology are to be shared between the airport and local communities. The Applicant has failed to accept that there is any policy obligation to share technology gains with the community and this cannot be supported.</p> <p>In the earlier iteration of the Environmental Statement (Chapter 14: Noise and Vibration), Paragraph 14.2.44</p>	<p>It should be demonstrated, as part of the Noise Envelope, how the noise benefits of future aircraft technology is to be shared between the airport and local communities. Local authorities do not accept suitable measures have been considered in deriving a Noise Envelope that suitably shares technology benefits in the future. This is of detriment to the environment and the community.</p> <p>In accordance with policy requirements set out in the Aviation Policy Framework, the Applicant should review its approach and provide a necessary response to ensure policy compliance.</p> <p><b><a href="#">Deadline 2 Update: The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information.</a></b></p>	<p><b><a href="#">Updated Position (Deadline 9, August 2024): MVDCs position on sharing the benefits is set out at MV29.</a></b></p>

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		<p>included detail on 'Sharing the Benefits'. The submitted and revised ES has removed this contrary to relevant policy.</p>	<p><b>Updated Position (Deadline 5 - May 2024):</b> <u>The Applicant's method for sharing the benefits is flawed as it allows for a substantial increase in noise contour area in the 2032 daytime period over the 2019 baseline. It is hard to understand how it can be justified that any benefits of new aircraft technology have been shared with the local community in this case.</u></p> <p><u>The Applicant has demonstrated sharing the benefits in 2038 but not for any other assessment year.</u></p>	
<b>Transport</b>				
<b>MV35</b>	<p><b>Inadequate public transport provision to effect modal shift</b></p> <p><b>Document Ref(s): APP-258</b></p>	<p>The submitted application provides insufficient public transport provision for Mole Valley district as a whole and especially for the most populated areas in the north of the district in Dorking, Leatherhead and Ashtead.</p> <p>The approach to coaches, buses and support for local commuters is not necessarily deliverable and will not be effective and instead will be</p>	<p>More steps need to be taken by the Applicant to demonstrate deliverable public transport interventions and additional public transport provisions that serve Mole Valley need to be included.</p> <p><b>Deadline 2 Update:</b> <u>The Applicant is referred to the Joint Surrey Council's Local Impact Report for more detailed information. The Applicant is also referred to the comments of Surrey County Council as the local Highways Authority for Mole Valley.</u></p>	<p><b>Updated Position (12 August 2024):</b> <u>The Council is no longer pursuing this issue independently, but do not consider this matter to be concluded as rail provision is a key factor to be considered.</u></p> <p><u>Instead, the Council consider any related/outstanding issues are a matter of ongoing discussions via SCC as the Highways Authority for MVDC.</u></p>

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		<p>detrimental to the wider community and businesses. Additional public transport provisions to serve Mole Valley need to be provided and information on funding and agreements with relevant operators shared. It is the Council's view that a notable modal shift to sustainable transport mechanisms is unachievable and not based on realistic or reasonable assumptions and forecasting.</p> <p>For such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.</p>	<p><b><u>Updated Position (Deadline 5 - May 2024):</u></b> <u>Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV.</u></p>	
MV36	<p><b>Inadequate rail strategy</b></p> <p><b>Document Ref(s): APP-258</b></p>	<p>The Council considers that the Applicant's assertions that "...no significant increase in crowding on rail services is expected as a result of the Project," (Transport Assessment, paragraph 9.8.7) to be erroneous and has disregarded its own evidence which shows an increase in numbers and crowding. The proposals are consistently</p>	<p>If an increased rail offer is not to be made and delivered, it is necessary for the Applicant to carry out additional modelling which places less reliance on existing, planned non NRP-related rail improvements and reflects usage and which more closely reflect what is more likely to happen.</p> <p><b><u>Deadline 2 Update:</u></b> <u>The Applicant is referred to the Joint Surrey Council's</u></p>	<p><b><u>Updated Position (12 August 2024):</u></b> <u>The Council is no longer pursuing this issue independently, but do not consider this matter to be concluded as rail provision is a key factor to be considered.</u></p> <p><b><u>Instead, the Council consider any related/outstanding issues are a matter of ongoing discussions via</u></b></p>

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		<p>contradictory and does little for meeting expressed targets for modal shift away from the private car, despite making it clear that that the Gatwick Stations Upgrade project is intended to make rail travel to and from the airport more attractive.</p> <p>With such a unique and large scheme, there are real opportunities for economic and environmental benefits linked to increasing rail travel. No attempt has been made to take this up and the Applicant has not looked sufficiently beyond the NRP boundary to achieve this.</p> <p>It is not considered that the Applicant's proposals will be in the public benefit and does not make the most of the linkages and available networks. Instead it relies on existing plans to accommodate passenger numbers and does not seek to fund schemes on the network at stations such as East Croydon and Dorking Deepdene which</p>	<p><u>Local Impact Report for more detailed information. The Applicant is also referred to the comments of Surrey County Council as the local Highways Authority for Mole Valley.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <u>Traffic, transport and surface access matters remain under discussion, led by SCC as the Highways Authority for MV. The Council welcome the input of Network Rail and the relevant rail operators in these discussions.</u></p>	<p><b><u>SCC as the Highways Authority for MVDC.</u></b></p>

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		<p>could affect a notable change for the benefit of the airport and wider economy.</p> <p>With such a limited rail offer, accompanying road transport modelling must be updated to be more realistic about the levels of car use that will be more likely.</p>		
<b>Socio-economics</b>				
MV37	<p><b>Overstatement of the wider, catalytic, and national level economic benefits of the NRP</b></p> <p><b>Document Ref(s): APP-042, APP-245, APP-250, APP-251, APP-252</b></p>	<p><u>The methodology used to assess the catalytic employment and GVA benefits of the development is not robust as it is not based on the use of available data relating to air passenger demand in the UK. The JLAs are not confident that these assessments present a realistic position in terms of catalytic employment at the local level such that the results should not be relied on.</u></p> <p><u>The national economic impact assessment is derived from</u></p>	<p><u>The catalytic impact methodology needs to properly account for the specific catchment area and demand characteristics of each of the cross-section of airports to ensure that the catalytic impacts of airport growth are robustly identified. Account needs to be taken of the specific relationship between growth at Gatwick and the characteristics of its catchment area, having regard to changes due to the NRP and displacement from other airports.</u></p> <p><u>The national economic impact assessment should robustly test the</u></p>	<p><b>Updated Position (Deadline 9): Although the Applicant provided some further explanation in REP3-78 (pages 100-105) and REP7-077, the council remains concerned that the methodology is not robust for the reasons set out at paragraphs 57-60 of REP4-052.</b></p> <p><b>It is understood that the Applicant contends that its assessment of the total employment impact of the growth of the Airport is calculated on a net basis, such that any local displacement is accounted for. As a consequence, it is claimed by the</b></p>

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		<p><del>demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects from other airports, as well as other methodological concerns. The methodology used to assess the catalytic employment and GVA benefits of the development is not robust, leading to an overstatement of the likely benefits in the local area. The national economic impact assessment is derived from demand forecasts which are considered likely to be optimistic and fails to properly account for potential displacement effects, as well as other methodological concerns.</del></p>	<p><del>net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</del></p> <p>-</p> <p>-</p> <p>The impact methodology needs to properly account for the specific catchment area and demand characteristics of each of London's airports to ensure that the catalytic impacts of airport growth are robustly identified. The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</p> <p><u>Deadline 2 Update: Work is ongoing between York Aviation and GAL regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at D5, Thursday 6 June.</u></p>	<p><b><u>Applicant that, to the extent that the direct, indirect and induced impacts may be estimated on a gross employment gain basis, this effect is neutral in terms of the estimate of total direct, indirect, induced and catalytic employment given that the catalytic employment is estimated as the difference between the total net employment gain and the calculated direct, indirect and induced employment.</u></b></p> <p><b><u>Given the concerns expressed regarding the catalytic impact methodology, the council do not accept that displacement has adequately been accounted for in the employment estimates, not least as no account is taken of the extent to which growth at Gatwick would be displaced from other airports. When coupled with the concerns regarding the catalytic impact methodology as a whole, little confidence can be placed on the reliability of the estimates of net local employment gain.</u></b></p>



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			<p><u>Updated Position (Deadline 5 - May 2024): The Applicant's attention is drawn to documents:</u></p> <ul style="list-style-type: none"> <li>• <u>10.1.18 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Capacity and Operations; and</u></li> <li>• <u>10.1.19 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Forecasting and Need</u></li> </ul>	
MV38	<p>The forecasts for the use of the NRP are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for Transport forecasts and having regard to</p>	<p><u>Following the provision of further information by the Applicant [REP1-054 and discussions, the hourly and daily aircraft movement capacity deliverable with the NRP Proposed Development is agreed as the likely maximum throughput attainable.</u></p> <p><u>However, the annual passenger and aircraft movement forecasts deliverable from this capacity are not agreed. Based</u></p>	<p>Additional market and demand analysis should be properly conducted with necessary and relevant adjustments made to London airport passenger projections which more accurately reflect the known and up to date situation. In this case it is known that Heathrow R3 is not going to be delivered and there are other known activities occurring within the wider London Airport network which could impact on the levels of competition and market share which can be</p>	<p><b><u>Updated position (Deadline 9, August 2024): Assessments should be based on a lower throughput of passengers with the NRP.</u></b></p>

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	<p><b>the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic</b></p> <p><b>Document Ref(s): APP-245, APP-250, APP-251, APP-252</b></p>	<p><u>on information provided by the Applicant it is considered that the maximum throughput attainable with the NRP to be of the order of 75-76 mppa so delivering a smaller scale of benefits. The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (See MV37). It is not considered good practice to base long-term, 20-year forecasts solely on a bottom up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport. In this case, top-down benchmarking against national forecasts has failed to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand across the London system is reliant on the assumption that a third runway would be delivered at Heathrow.</u></p>	<p>considered by GAL in its demand analysis.</p> <p><b>Deadline 2 Update:</b> <u>Work is ongoing between York Aviation and GAL regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at D5, Thursday 6 June.</u></p> <p><b>Updated Position (Deadline 5 - May 2024):</b> <u>The Applicant's attention is drawn to documents:</u></p> <ul style="list-style-type: none"> <li>• <u>10.1.18 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Capacity and Operations; and</u></li> <li>• <u>10.1.19 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Forecasting and Need</u></li> </ul>	
MV39	The capacity deliverable with	Following the provision of further information by the	Full modelling of the interaction between the use of the two runways	<b>Updated position (Deadline 9, August 2024): Assessments should</b>

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	<p><b>the NRP proposed development</b></p> <p><b>Document Ref(s): APP-245, APP-250, APP-251, APP-252</b></p>	<p><u>Applicant [REP1-054 and discussions, the hourly and daily aircraft movement capacity deliverable with the NRP Proposed Development is agreed as the likely maximum throughput attainable.</u></p> <p><u>However, the annual passenger and aircraft movement forecasts deliverable from this capacity are not agreed. Based on information provided by the Applicant it is considered that the maximum throughput attainable with the NRP to be of the order of 75-76 mppa so delivering a smaller scale of benefits.</u></p> <p><u>Modelling by GAL of the capacity deliverable with the NRP has assumed that 1 minute separations can be achieved between all departing aircraft using the two runways. This is not possible with the existing structure of Standard Instrument Departure Navigation (SIDs), particularly given the commitment not to</u></p>	<p>and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.</p> <p><u><b>Deadline 2 Update:</b> Work is ongoing between York Aviation and GAL regarding a joint local authority SoCG on operations/capacity and needs/forecasting. As this is a work in progress, the PADSS for these elements have not been updated but will be at D5, Thursday 6 June</u></p> <p><u><b>Updated Position (Deadline 5 - May 2024):</b> The Applicant's attention is drawn to documents:</u></p> <ul style="list-style-type: none"> <li><u>• 10.1.18 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Capacity and Operations; and</u></li> <li><u>• 10.1.19 - Statement of Common Ground Between Gatwick Airport Limited and the Joint Local Authorities on Forecasting and Need</u></li> </ul>	<p><u><b>be based on a lower throughput of passengers with the NRP.</b></u></p>

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		<p><del>use WIZAD SID (tactical routing to avoid congestion) in the night period, and so additional delays to aircraft will arise so increasing delays above those stated in the Application documents. As a consequence the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.</del></p>		
<p><b>NEW: MV44</b></p>	<p><u>Baseline Case has been overstated leading to understatement of the impacts.</u></p>	<p><u>There is concern that it is unreasonable to assume that the existing single runway operation will be able to support 67.2 mppa meaning that the assessment of impacts understates the effects, see <b>REP4-049</b>. The JLAs believe that the maximum throughput attainable in the Baseline Case is likely to be of the order of 57 mppa and that this alternative Baseline should be adopted as the basis for assessing the effects of the Proposed Development.</u></p>		<p><b>Updated position (Deadline 9, August 2024): The Alternative Baseline Case should be adopted as the basis for assessing the impacts of the NRP.</b></p>
<p><b>MV40</b></p>	<p><b>Issues with the deliverability of the</b></p>	<p>While the Council considers that the ESBS Objectives and themes are acceptable, the Council does</p>	<p>The ESBS needs to map out clear projects, partnerships, costings and</p>	<p><b>Updated Position (Deadline 9, August 2024): The Council consider that this matter is being</b></p>

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	<p><b>Employment, Skills and Business Strategy (ESBS) and whether the proposals are robust or effective</b></p> <p><b>Document Ref(s): APP-198</b></p>	<p>not consider them to be 'SMART' and it is unclear whether the S106 or some other mechanism will be able to set out the specifics and provide a base which can be monitored. There appears to be no costing or clear resourcing implications which again lessens confidence that the outputs are any more than hypotheticals at this time.</p> <p>The ESBS is predominantly based upon on what could be done/achieved and not what will.</p>	<p>resource implications to demonstrate deliverability.</p> <p><u>Deadline 2 Update: Still awaiting an update from the Applicant, via the SoCG.</u></p> <p><u>Updated Position (Deadline 5 - May 2024): While it is noted that the Draft Section 106 Agreement Annex: ESBS Implementation Plan has been provided by the Applicant (REP3-069), the Council do not consider this matter be resolved and issues remain.</u></p> <p><u>As stated in the Joint Surrey Council's D4 representation (REP4-054) as currently worded in the draft S106 fails to address MVDC's concerns and there is no mechanism by which the authorities can enforce the terms of the agreement as they relate to the ESBS. This means that there is no certainty of delivery of the ESBS.</u></p> <p><u>The LPAs need to be responsible for approving these documents in consultation with, and on the recommendation of, the ESBS Steering Group.</u></p>	<p><u>considered through the preparation of the S106 agreement process and have no further comments to make.</u></p>

