



Horsham
District
Council

Gatwick Airport Northern Runway Project

National Infrastructure Project: TR020005

Horsham District Council Principal Areas of
Disagreement Summary Statement

Version 4 (clean version)

Deadline 9 submission 21 August 2024

Interested Party Reference: 20044739

Principal Areas of Disagreement Summary Statement (PADSS)

Version Number: 4

Submitted at: Deadline 9: 21 August 2024



This statement has been prepared by Horsham District Council (“the Council”) with input from the Joint Local Authorities, technical consultants and legal specialists. The Council is one of the local authorities identified by Section 43(2) of the Planning Act 2008. This Statement identifies the principal areas of disagreement.

This iteration of the PADSS follows the submission of Version 3 ([REP5-091](#)) to the Examining Authority (“ExA”) in June 2024 and has been updated to identify the remaining principal areas of disagreement as further work and engagement has been undertaken with the Applicant towards the close of the examination.

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1. BASELINE, FORECASTING AND ECONOMIC CASE

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1.1	The capacity deliverable with the NRP Proposed Development	<p>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.</p> <p>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.</p>	Assessments should be based on a lower throughput of passengers with the NRP.
1.2	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 the potential for additional capacity to be delivered at other airports. The demand forecasts	<p>The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the NRP (see point above). 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.</p> <p>Alternative top-down forecasts have now been presented by GAL [REP1-052] that show slower growth in the early years following the opening of the NRP. These are considered more reasonable than the original bottom-up forecasts adopted by the Applicant but still fail to take adequate account of the extent to which some part of the demand</p>	The adoption of the top down forecasts, including an allowance for capacity growth at the other London airports as the base case for the assessment of the impacts of the NRP and the setting of appropriate controls on growth relative to the impacts.

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	are considered too optimistic	could be met by expansion at other airports serving London including a third runway or other expansion being delivered at Heathrow.	
1.3	Baseline Case has been overstated leading to understatement of the impacts.	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 REP4-049 . 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.	The Alternative Baseline Case should be adopted as the basis for assessing the impacts of the NRP.
1.4	Overstatement of the wider, catalytic, and national level economic benefits of the NRP	<p>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.</p> <p>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 from other airports, as well as other methodological concerns. The Council has noted the recent recovered appeal in relation to expansion of London City Airport in this</p>	<p>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.</p> <p>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>

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		<p>context and further comment will be made by the JLAs at Deadline 10.</p>	<p>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. 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 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. 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.</p>

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2. TRAFFIC AND TRANSPORT

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
<p>The Council endorses the PADSS submitted by West Sussex County Council, as the local highway authority, in relation to transport modelling, impacts and mitigation on local highways.</p>			
2.1	Absence of an Airport Surface Access Strategy	<p>ES Appendix 5.4.1 Surface Access Commitments (paras 2.1.9 and 5.1.2) highlight that an ASAS has not been prepared to support the NRP proposals. Ch.12 Traffic and Transport, Table 12.3.2, p.20 also details that the Car Parking Strategy will be part of the future ASAS and it is not clear how the proposed parking numbers fit within the wider surface access strategy. The Council is concerned that the lack of a clear strategy risks the Applicant's objectives and commitments not being secured through the DCO.</p> <p>The Council remains concerned that further interventions are necessary if the Applicant is to achieve the mode share targets. Submissions by the Applicant in relation to the necessity of an early ASAS plan are noted, however the Council considers this would provide certainty over the ability of the Applicant to meet mode share targets.</p>	<p>Applicant needs to demonstrate how the mode share targets and mitigation will be secured.</p> <p>Final position The Council is supportive of the Examining Authorities' potential amendments to Schedule 2 of the draft DCO submitted by the Applicant at Deadline 7, subject to comments submitted by the Legal Partnership Authorities at Deadline 8 [REP8-165].</p> <p>Enabling more multi-modal trips to be taken by workers and passengers is a critical part of delivering modal shift away from cars. This requires measures such as shorter/priority bus routes, more frequent train and bus services overnight, integration of bus and train times, high quality cycle infrastructure and cycle parking. It also needs 'soft' measures: better information and incentives to encourage people to use sustainable travel. To be effective, such provision needs to come before additional provision for car trips, such as increased car parking.</p>
2.2	Passenger and staff parking	<p>The methodology to derive the proposed parking provision of an additional 1,100 spaces for passengers is not clear, nor how this fits with the wider mode share targets. Similarly, the loss of 1,150 spaces for staff parking also needs to be explained given the increase in staff numbers in both the with and without project scenarios.</p>	<p>The Applicant is asked to clarify how the car parking provision has been reached and fits within its wider modal shift commitments.</p> <p>Clarification is required around the approach to staff parking reduction. The most up to date staff travel data must be taken into account to inform an</p>

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			<p>approach to staff parking which meets the aspiration to increase staff travel by sustainable modes.</p> <p>Final position A review of the Car Parking Strategy submitted by the Applicant at Deadline 1 has raised concerns about the acute loss of staff spaces, as opposed to the gradual reduction referred to previously by the Applicant. The Council considers further analysis, taking account of the updated Staff Travel Survey 2023, is key to any staff parking strategy.</p> <p>The Council considers a removal of permitted development rights for additional car parking provision would help address concerns over mode share. Securing of car parking requirements through the SAC is also sought.</p>
2.3	Surface Access Commitments (SACs) and Target Mode Shares	<p>Concerns are held about the Surface Access Commitments that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these targets. Further detail is set out in the Joint West Sussex Local Impact Report, however in summary some of the concerns include:</p> <ul style="list-style-type: none"> - Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020 (Paragraph 12.6.11 ES Chapter 12 Traffic and Transport). - Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit 	<p>Surface Access Commitments and associated mitigation to be reviewed and amended.</p> <p>The Council notes that an updated version of the Surface Access Commitments [REP3-028] was submitted by the Applicant at Deadline 3. This revised document does not include any further commitments in relation to bus priority measures. While the update states the Applicant intends to work with rail operators to increase mode share under 'Further Aspirations', opportunities to maximise the contribution of rail access do not appear to have been explored further as part of the proposed SACs. The Council remains concerned at the lack of mitigation and controls within the SACs [REP3-028] to ensure that the modal split commitments are delivered.</p> <p>Furthermore, concerns remain over the Applicant's Active Travel commitments and the Council supports the view of WSCC that improvement of local provision is insufficient to promote active travel away</p>

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		<p>significant increases in car trips to and from the airport.</p> <ul style="list-style-type: none"> - Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable and active travel infrastructure to successfully meet the some of the target modal splits. - Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The applicant has not assessed or considered the attractiveness of modes or how this could be increased. For example, by providing enhanced bus priority measures to provide journey time savings. There are no proposed enhancements for services connecting locations within Horsham District to Gatwick Airport which is very disappointing. As a minimum support for Route 200 which operates between Horsham and Gatwick Airport should be included as part of the service enhancements. - Funding for services should be expanded and enhanced, both with a commitment to fund beyond the short-term (i.e to ensure the coach services running to the airport are viable) and with some investment in indirect journeys to and from the airport, such as journeys from home to coach terminals, with a view to minimising the use of private vehicle. - Commitment 8 indicates that there will be support for local authorities affected by unauthorised car 	<p>from the road network and also additional recreational routes for walkers and, cyclists are necessary.</p> <p>Final position: The Council’s position is aligned with that of West Sussex County Council as the highways authority.</p> <p>Concerns remain about the SACs that underpin the Surface Access Strategy and the approach to meeting and monitoring these targets. There is considered to be a lack of suitable control should the SACs not be met.</p> <p>While the ExA’s revisions to requirement 20, supported by the JLAs, and the Applicant’s supplements to the SAC are considered to be improvements, in themselves they are not sufficient to provide appropriate controls and reassurance that the mode share commitments will be met or that timely mitigation will be provided should they not be met.</p> <p>It, therefore, remains the highways authority’s position that more is required in relation to surface access and specifically additional controls to ensure compliance with mode share commitments. The JLAs’ proposal for EMG includes clearer, earlier checks on whether mode share commitments are likely to be met, provides a more robust set of controls to delivery the required outcomes in accordance with the Environmental Statement an the SACs. The EMG approach also allows the use of controlling growth at the airport as mechanism to help meet the SACs.</p> <p>In addition, the JLAs have set out the measures and changes they consider necessary should the ExA and the SoS not be persuaded of the JLA’s justification for EMG in relation to surface access. These are set out in REP7-102 and, in light of the material submitted by the Applicant at Deadline 8, a further Deadline 9 submissions from the Legal Partnership Authorities, providing additional points on the drafting of the DCO, which includes changes to requirements relating to the SACs.</p>

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		<p>parking in areas near to the Airport, however, there is a lack of details around the nature and scale of funding and how any monies will be distributed.</p> <ul style="list-style-type: none"> – The timescale within which the Applicant will meet the mode share commitments are inadequate, and the Council considered these should be met, where appropriate, at the time the second runway becomes operational. As the Surface Access Commitments stand, the second runway can be operation for three years without these targets being achieved. – Should the SACs not be met the proposed approach allows for higher levels of vehicular traffic than is targeted by the SACs for a substantial period of time. The Applicant will produce an Action Plan to address the failure to meet the targets. This does not provide sufficient control and the Highway Authority advocate a Green controlled Growth approach, similar to that adopted by Luton Airport. 	
2.4	Modelling inputs	<p>The Council has a number of concerns with regard to the core modelling scenario. There is concern that the exclusion of Land West of Ifield and Heathrow R3 do not present a realistic scenario for the transport assessment. May skew the results of the transport assessment. The concern is that the scenario assessed may not provide a realistic worst-case assessment.</p> <p>The Council does not agree that sites, such as Land West of Ifield, should be excluded from the core modelling scenario</p>	<p>Applicant should provide a realistic worst-case assessment and ensure consistency in the assessments across the different topic areas. This should include the construction phase of the West of Ifield strategic site allocation in the transport modelling, and Heathrow R3.</p> <p>This has not been addressed to date.</p>

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		while growth from future housing trajectory is being relied upon in the socio-economic assessment.	
2.5	2,500 robotic parking spaces should not be included in the future baseline	<p>The Council endorses the view of Crawley Borough Council that the proposed 2,500 robotic parking should not be included as permitted development and therefore part of the baseline. The current temporary trial for 100 robotic spaces is not comparable. It would significantly increase parking capacity and the highways impact will need to be considered in full.</p> <p>The full 2,500 spaces are included in the parking baseline on the assumption of a successful Permitted Development consultation that would be required by the Applicant, and this position has been reiterated in the Applicant's response to the ExA's Rule 17 letter requesting further information on car parking [REP8-114]. This is not considered to be a robust approach given the uncertainty that the Applicant could provide evidence of the spaces being required.</p>	The 2,500 robotic car parking spaces should be removed from the baseline and be included under the scope of the Project. Alternatively, the Council is supportive of the removal of permitted development rights in relation to parking.
2.6	Transport impacts, mitigation and commitments: lack of wider improvements to the sustainable transport network in Horsham District.	The mitigation as proposed is insufficient and there is inadequate detail on the level of funding associated with the various funds detailed in the Mitigation Route Map and how this will be distributed to fund improvements e.g., no indication of scale of funding associated with the Transport Mitigation Fund. Commitments are currently considered to lack robustness, sufficient to be secured as part of the DCO e.g., Commitments 5, 6 and 7 in the SAC detail that the Applicant will "provide reasonable support for services" but it is not clear what constitutes "reasonable support", nor who will be responsible for determining this. As currently	<p>Consideration of meaningful enhancements and improvements to encourage active and public transport in direct and indirect journeys to the airport from Horsham District.</p> <p>Discussions on the funding arrangements under the S106 agreement in relation to Sustainable Transport have been positive. The Council has summarised remaining concerns on the SACs and how the Applicant will achieve mode share targets elsewhere and considers that practical enhancement of measures and provision, as well as incentives to encourage a shift towards sustainable travel to the airport is essential.</p>

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		<p>proposed the details are not sufficient to provide assurances to those responsible for delivering the services or to secure meaningful provision of improvements.</p> <p>The Applicant has not addressed the potential for improvements to access to the airport by active and public transport from Horsham District.</p> <p>Walking, wheeling and cycling connectivity in adjoining development, to improve the ability of residents living to the west of Crawley to access existing public transport networks has not been fully explored.</p> <p>The Applicant has also not considered the provision of a more attractive bus route from the north of Horsham to the airport, considering improvements to bus routes which would lead to time saving on bus journeys to the airport.</p>	

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3. AIR QUALITY

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3.1	Air Quality and Emissions Mitigation Guidance for Sussex (2021)	<p>Clarification from the Applicant is requested to explain the extent to which the Sussex Guidance was given consideration in preparing the air quality mitigation plan.</p> <p>The overarching principle of the guidance is to, as far as it is possible, design emissions out of a scheme, and mitigate or offset any residual emissions. Thus, the guidance aligns with the aims of Defra's Clean Air Strategy on reducing emissions to protect health and protect the environment, and the HDC environmental policy, which is why it is essential applicants adhere to its principles.</p>	The Applicant should consider and respond to the Sussex Guidance, as is the expectation for any major development
3.2	Health Damage Cost Calculation	<p>The emissions calculation and total calculated value of emissions' health damage cost were not included in the DCO documents.</p> <p>Understanding costs is essential to effective and necessary mitigation and Chapter 13.12.6 states the costs associated with air pollution are considered under the Socio-Economic Effects of Chapter 17. However, there is no mention of such costs in Chapter 17.</p>	The Applicant should undertake the emissions calculation and health damage cost calculation and commit to meeting the costs to ensure effective and necessary mitigation is provided
3.3	Air Quality Mitigation Plan (Operational)	Lack of a stand-alone operating Air Quality Plan. The guidance requires that each application is supported by an air quality mitigation plan detailing measures to mitigate and/or offset the impacts and setting out itemised costing for each proposed measure.	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.

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		<p>It is recognised that air quality mitigation measures have been set out in the Carbon Action Plan (Appendix 5.4.2: Carbon Action Plan) and Appendix 5.4.1: Surface Access Commitments.</p> <p>Although they may contain the same measures, the aim of a Carbon Plan is reducing emissions on a larger scale, such as a region, whereas the aim of an air quality plan would be to reduce/offset emissions locally. Furthermore, an effective air quality plan would contain the following elements for each proposed measure: Costings; Performance Indicators; and Delivery Timescales.</p> <p>These are the essential mechanisms that can enable the Authorities and the Airport to respond accordingly for the benefit of communities and public health. It is essential that there is confidence that proper monitoring mechanisms and indicators are established at the outset and reviewed as necessary. The Carbon and Surface Access plans do not address any of these criteria.</p>	<p>Final position:</p> <p>The Council continues to consider that the provision of information in line with Sussex Guidance would be beneficial for defining mitigation measures within the AQAP.</p> <p>The SACs have already been taken into account in the assessment of air quality impacts. The air quality effects of the Project are therefore those which remain assuming all SAC are met.</p> <p>The Sussex Guidance specifies that, even where air quality standards are met, the health effects of additional pollution emissions as a result of the Project should be mitigated.</p> <p>It is the Council's view that since SAC have already been taken into account (embedded), additional mitigation is needed to mitigate the increased airport related pollution in line with the damage costs as per the Sussex Guidance.</p> <p>The Council has concerns that if modal shift targets are not achieved or if 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.</p> <p>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.</p> <p>The Applicant argues this is unreasonable and tries to suggest that the JLAs are attempting to prevent planning consent on the basis of potential</p>

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			<p>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.</p> <p>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.</p>
3.4	<p>Air Quality Mitigation Plan (Construction)</p> <p>Appendix 13.8.1: Air Quality Construction Period Mitigation</p> <p>Appendix 5.3.2: Code of Construction Practice Annex 3 - Outline Construction Traffic Management Plan</p>	<p>Construction traffic will use the strategic route network in the District.</p> <p>Although commitment to adopting London Low Emission Zone standards was made at the PEIR stage, Appendix 13.8.1 advises the standards will be used "where applicable" while Paragraph 7.2.15 of Appendix 5.3.2 states that "Low emission plant would be encouraged and used where practicable [...]" but provides no further details and makes no commitment to using London Low Emission Zone standards and adopting a Fleet Recognition Scheme.</p> <p>Lack of Emissions Monitoring Strategy for the Construction Phase.</p> <p>No specific details for the construction phase monitoring strategy were provided. Although it is expected that a dust monitoring plan and a monitoring plan will be provided at a later date, key points and decisions should have already been made available.</p>	<p>Insufficient information provided in the DCO evidence base in relation to the London LEZ, which does not accord with what has been advised by the Applicant previously, and the construction phase monitoring strategy. The Applicant is therefore requested to provide this information.</p> <p>The Joint Local Authorities have submitted a detailed review of the GAL Dust Management Plan [No Examination Ref]. Please see REP4-053 for this detailed review.</p> <p>Without a response from GAL to the DMP review (and any updated DMP committed to by GAL for Deadline 5 [REP4-033] further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p> <p>Final position:</p> <p>A review of the Deadline 8 Submission ' 5.3 Environmental Statement Appendix 5.3.2 Code of Construction Practice - Annex 9 - Construction Dust Management Strategy (CDMS) - Version 2 (Tracked)' [REP8-047] indicates that the majority of remaining changes required have been</p>

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			<p>implemented. However, there remains two aspects of the updated CDMS that have not been addressed.</p> <p>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).</p> <p>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. 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.'</p> <p>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.</p>

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3.5	Model results – 2047 scenario	Despite previous commitments to including a 2047 scenario, this scenario has not been modelled.	<p>The 2047 scenario should be modelled</p> <p>Final position:</p> <p>The Applicant has provided information on road traffic emissions in 2047, but the impact of airport emissions, which will be of increased relative importance in 2047, have not been modelled for the airport at full capacity.</p>

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4. NOISE AND VIBRATION

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4.1	The Applicant's interpretation of national policy and the effect this has on the communities affected by the airport operations (Air Noise)	<p>The Council disagrees with the Applicant's interpretation of national policy in respect of noise and aviation noise policy statements. This has influenced their approach to the work.</p> <p>In consequence, the benefits of technological improvements are not being shared sufficiently with affected communities and disproportionate benefit is derived for the Applicant. The total adverse impacts of noise are not being mitigated and the approach does not appear to be consistent with the Aviation Policy Framework, Airports National Policy Statement, Overarching Aviation Noise Policy and the Noise Policy Statement for England.</p>	<p>The Applicant needs to amend its approach and update all relevant chapters and appendices accordingly so that the assessment of impact, mitigation (including reducing noise at source, improved operational practice and physical mitigation) and compensation is suitably revised.</p> <p>Final position: The Applicant has modified its stance slightly during the examination but has not addressed these issues sufficiently.</p>
4.2	Local Planning Policy (Air Noise)	Local planning policies in relation to noise are briefly referred to in sections 14.2.61 to 14.2.62 of Chapter 14 the Environmental Statement. There is no explanation of the policies, the weight given to them and how they have influenced the design, assessment of impact and mitigation of the proposal. This is contrary to the 'Balanced Approach' required by UK and international policy.	<p>The Applicant needs to clearly explain how they have had regard to (or otherwise) local planning policy. This is not only in relation to noise but also for wider impacts on land use planning including provision for housing and other noise sensitive development that will be affected by the NRP.</p> <p>Final position: The Applicant has referred to housing allocation but appears to have no regard to the effects of the proposed development on new housing. The Applicant has not taken into consideration noise policies including the Planning Noise Advice Document: Sussex in relation to the consideration of impacts and effects such as overheating. The consideration and treatment of local plan policies is influenced by the application of national policies that the Authority considers has not interpreted correctly.</p>

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4.3	<p>Threshold and scope of LOAELS and SOAELS</p> <p>(Air Noise)</p>	<p>The ES only considers the Leq metric for LOAELs and SOAELs. In doing so it makes reference to national policy.</p> <p>Whilst the Leq metric is explicitly in national policy, it is not exclusive. The consideration only of Leq as a metric is too narrow and other metrics should be applied to the decision processes within the Project to inform impact and mitigation.</p> <p>In determining the LOAELs and SOAELs more recent data, including planning decisions and revised health assessment criteria need to be applied. The consideration only of the Leq metric does not represent all the effects of air noise across the District.</p>	<p>Inclusion of assessment for a wider range of criteria, including but not exclusively, awakenings, N above contours in addition to the Lden and Lnight.</p> <p>Final Position: HDC are disappointed with the level of information provided regarding secondary metrics as it considers that it would better represent the impacts across the District.</p> <p>Information has only been provided for seven “community representative” locations that do not cover all affected communities and no relevant information provided regarding overflights.</p> <p>Awakening contours are highly relevant to the residents in the North of the District in the rural communities as it is possible that use of Leq metrics will not adequately describe the impacts of night noise.</p>
4.4	<p>Modelling</p> <p>(Air Noise)</p>	<p>The forecast modelling is only partially complete for the future years. There is no information for 2029. Local authorities have requested a sensitivity analysis showing the 2019 base year movements with the predicted 2029 fleet mix to determine actual improvements that might be experienced with technology.</p> <p>A number of datasets are incomplete including missing overflight information.</p>	<p>The assumptions and validation information for the model need to be provided and any modelling needs to be subject to full scrutiny.</p> <p>Additional modelling needs to be completed. All years must be scenario tested for all metrics and this must relate to departures as well as arrivals.</p> <p>Modelling uncertainty needs to be included, as do all assumptions (including runway usage, fleet mix (including quota count information) and anticipated SID usage on an hourly basis.</p>

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		<p>The information presented for awakenings is completely inadequate.</p> <p>The Applicant has refused to disclose information about how the model is validated and instead asked the all authorities to trust that it is correct. This is clearly not transparent and without validation all underlying predictions are called into question.</p>	<p>Final Position: The Applicant has made no attempt to address the Council's concerns on these matters.</p>
4.5	<p>Quantification of effects based on limited threshold information</p> <p>(Air Noise)</p>	<p>Chapter 18 – Health and Wellbeing for the significant effects of noise is based on the disputed thresholds contained in ES Chapter 14 – Noise and Vibration. As the thresholds are disputed this calls into question the calculation of the significance of effects.</p>	<p>Significance of effects must be calculated using more recent data including updated WebTAG and most recent review of effects of noise on health. The Applicant needs to clearly demonstrate that the impact of additional noise induced awakenings is appropriately taken into consideration in the WebTAG assessment. In addition, consistent use of datasets and data populations is required to aid understanding and analysis. Full monetisation of effects needs to be provided to properly understand impacts.</p> <p>Final Position: The Applicant has made no attempt to address the Council's concerns on this matter.</p>
4.6	<p>Assessment of significance of effects – the disregard of total effects of noise on health and annoyance by referring only to marginal impacts of the NRP over a rapidly increasing</p>	<p>The Environmental Statement takes into consideration only the marginal increase in noise as a result of the additional capacity of the NRP. Given this, it disregards the existing health effects of the otherwise uncontrolled and unmitigated growth.</p> <p>For example, awakening data for the NRP part of capacity is below the Heathrow SOAEL of one additional noise induced awakening.</p>	<p>An existing baseline for all metrics needs to be established with sensitivity testing for baseline and cumulative impact with the Northern Runway in operation to understand total effects of the operation and whether this is a) acceptable and b) appropriate mitigation is in place to address the impacts.</p> <p>Final Position: The Applicant has made no attempt to address the Council's concerns on this matter.</p>

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	baseline (Air Noise).	However, this disregards the awakenings that occur now and the increase in awakenings that will occur with purported increase in baseline growth without the Northern Runway.	
4.7	Assessment of changes in sound levels (Air Noise)	There is insufficient consideration of the impacts of changes to noise levels for a range of metrics that lie between the LOAEL and SOAEL or above the SOAEL. An assessment of significance of the changes is required to determine if it is acceptable and if so, what mitigation is required in such circumstances.	Additional clarification is required for changes in exposure to an agreed range of metrics including N above, awakenings and overflights to understand impacts then determine if this is acceptable and if so, how they can be mitigated. Final Position: HDC are disappointed with the level of information provided regarding secondary metrics. Information has only been provided for seven “community representative” locations that do not cover all affected communities and no relevant information provided regarding overflights.
4.8	Assumptions on WIZAD (Route 9)	WIZAD (Route 9) is a tactical offload route with prohibition on use between 23:00 and 07:00. Under the proposals the local air traffic control at Gatwick Airport would have no choice but to schedule aircraft on this route thereby making it a planned permanent use. The impact on Horsham town has not been adequately assessed and the periods of greatest impact have not been made clear. This impacts existing dwellings, those currently under development and proposed new development including schools. Recent clarification from the Applicant has shown that the whole route is not an option for FASI-S airspace change	The use of WIZAD (Route 9) needs to be controlled to ensure that the use remains as intended at the time of definition (including level of traffic). Final Position: This has not been addressed by the Applicant who has stated that controls on this route may have an impact on them. However, this is contrary to other statements they have made. For certainty, the Council would like to see a control placed on the route because expansion at the airport will have a direct effect on it which HDC considers has not been properly taken into account.

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		<p>proposal but that new routes following the initial path of WIZAD and headed to the south are.</p> <p>The independent expert advice from York Aviation is that the increase in airport capacity is likely to drive an increase in use of the WIZAD route.</p> <p>There are reports that the route is already being used to deal with ground congestion contrary to the conditions on the use of the route [REP7-112].</p>	
4.9	Noise Insulation Scheme	<p>The noise insulation scheme is not sufficient to protect those who will suffer adverse effects of noise and deal with the unintended consequences of the installation of noise insulation. There are multiple issues with the scheme, by way of example, the Council:</p> <p>(i) disagrees that the thresholds of qualification are set at the correct level and within the correct parameters;</p> <p>(ii) considers the Applicant has had no regard to overheating created as a result of the installation of noise insulation measures;</p> <p>(iii) disagrees that once installation is complete all ongoing maintenance and running costs are borne by the householder or person in charge of the premises; and</p> <p>(iv) considers that everyone should be eligible for the scheme whether or not they have qualified previously.</p>	<p>The Applicant will need to improve the offering based on consideration of a wider range of determinants and having regard to multiple use types: make separate provision for prevention of overheating; define qualifying areas based on single mode noise contours; be predicated on predictive work; and start as soon as possible before commencement.</p> <p>The requirement to use predictive work to determine future noise levels to qualify for insulation relates to both air and ground noise.</p> <p>Noise exposure exceedances against which grant qualification is determined must be based on air noise, ground noise or the cumulative effect of both whichever is the greater noise level at the receiving property.</p> <p>Final Position: The Applicant has submitted minor modifications but made no attempt to update the noise insulation scheme to address HDCs concerns.</p>

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4.10	Noise Envelope	The Council does not consider the noise envelope is fit for purpose on multiple grounds	<p>The noise envelope needs to be redesigned from first principles to provide a responsive, preventative, self-regulating mechanism that incentivises the use of quieter fleet and shares the benefit of technological improvements with the local community through a range of operational and outcome-based measures. It needs to be governed by a steering committee that includes local authorities and provides them with a balanced range of intervention and enforcement tools.</p> <p>Final Position: No attempt has been made to address these concerns.</p> <p>The Council unequivocally supports the adoption of the Environmentally Managed Growth Framework for noise whose principles are set out in [REP4-050] and [REP5-093].</p> <p>It addresses all the concerns of the local authorities and the communities whilst rewarding good environmental practice with release of capacity. It provides for good operational practice, establishes a regulatory role for affected authorities with suitable powers of investigation, is transparent and provides local democratic accountability. It gives the local communities certainty and the mechanism ensures noise envelope remains relevant. The Applicant's misleading and inaccurate portrayal of the proposal, and vehement resistance to it, is disappointing and counter productive to the examination.</p>
4.11	Fleet prediction	The independent expert provided by York Aviation disagrees with the Applicant's forecast fleet mix and passenger demand, The Applicant therefore has allowed headroom to increase capacity without the sharing of the benefit of new technology with the local community.	<p>[new at D9]</p> <p>Final Position: The original central case fleet mix needs to be used to define a noise contour area. The noise contour area also needs to be adjusted for different demand scenarios.</p>

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			The Applicant fundamentally disagrees with this fleet proposition.
4.12	Operational control at airport	There are inadequate operational controls in place to provide assurance that the risks of ensure that the airport can assure HDC that the forecasts are likely to be achieved	[new at D9] Final Position: The DCO must explicitly state the <i>minimum</i> operational controls to ensure that there is a reasonable prospect of achieving the forecasts. This includes QC budgeting system (as described in the EMGF) and QC conditioned slot release.
4.13	Adequacy of powers	That the DCO does not contain provision to allow for the investigation and obtaining information unless an offence is committed. This will make it difficult to establish if such an offence has been committed due to the statutory threshold.	[new at D9] Final Position: There must either be a duty on the Applicant to provide information at the request of the host authority within a DCO requirement or a power of the host authority to request information against which there is appropriate sanction for non compliance.
4.14	Scrutiny	The HDC is concerned that there is inadequate local democratic accountability and scrutiny in the proposals by the Applicant given the scale of the operation and the magnitude of the effects.	[new at D9] Final Position: A formal scrutiny group must be formed with appropriate powers to have oversight of environmental performance and any related matters.
4.15	Draft DCO	The control of air noise, by metric and operational limitation, is under-represented in the DCO including (but not exclusively) the noise envelope requirements, use of routes, night flying restrictions, limitation on passenger numbers and freight movements; and conditional slot management.	A substantial review of the DCO to ensure there is adequate representation of, amongst other things, noise and associated operational controls, enforcement mechanisms, access to information, noise envelope scrutiny group, full funding of local authority costs including staff and specialists as required to oversee the DCO in construction and operational phases.

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			<p>Final Position: The Council does not feel that adequate controls are in place. The Applicant has dismissed any requests to submit improved controls (through the section 106 agreement as well) and the JLAs have submitted new requirements to the Examining Authority to address these concerns but thus far these remain unaddressed.</p>
4.16	Lack of ongoing research to test adequacy of proposals	<p>The ES utilises models to predict noise levels, the impacts, the locations of the impacts and inform mitigation. All decision-making is based on the knowledge described in the ES at the time of the determination of the application.</p> <p>There are no proposals for research to improve understanding as part of an iterative development of an environmental impact and management system.</p>	<p>The Council expects the Applicant to fund a range of research work, that is commissioned by the local authorities or the Applicant (at the discretion of the host authority) into a wide range of matters including:</p> <ul style="list-style-type: none"> improving the prediction of noise contours so that lower noise levels can be effectively modelled; establishing local population attitudes to noise; validating effectiveness of noise insulation works; techniques to tackle overheating in noise insulated properties. <p>Once the work is completed, it is then used to improve systems or adapt the mitigation appropriately or both dependent on the nature of the research.</p> <p>Final Position:The Applicant has refused to conduct any further research of this nature. It cannot therefore be demonstrated that the effects are understood and prevented, avoided or minimised in accordance with policy.</p>
4.17	Ground noise	<p>There seem to be little new provisions to control the ground noise from the Airport. During construction the noise bund is due to be removed but aircraft taxi-ing will continue. The creation of a flood area to the West of the runway will change the propagation characteristics of the sound and the Council is concerned about increases in</p>	<p>Controls that are expected would include the retention of existing planning restriction; the restriction of engine testing at certain times of the day and /or night at different locations; towing to stands closest to residential properties during the 8 hour night period, any other operational techniques</p>

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		<p>ground noise as a result, particularly the lower frequencies.</p> <p>Updated Position 15/08/2024. Despite requests for ground noise modelling showing noise levels between LOAEL and SOAEL, the information has not been provided by the Applicant.</p> <p>The Applicant has not addressed how ground noise will be controlled other than by reference to noise insulation.</p> <p>The Applicant sought to extinguish all existing planning controls over ground noise without any replacement control.</p> <p>There is no consideration of how the effects of ground noise generated as a result of the use of new airport facilities on the local communities could be controlled.</p>	<p>to reduce noise emissions; and the installation and maintenance of noise barriers, on or off airport.</p> <p>The Applicant should establish an operational and capital investment programme to progressively reduce the effects of noise on the residents in the area. There is no reason why the requirement for reduction in air noise could not be extended to the extent of ground noise.</p> <p>Final Position: The Applicant has not addressed this matter from the original proposal</p>
4.18	Modelling (Ground Noise)	Absence of ground noise modelling procedures and results to show contours of ground noise associated with airport operations, as existing during the baseline and then under future scenarios.	Production of ground noise contours under appropriate modes including but not limited to single mode Easterly and Westerly for LAeq 16h and LAeq8, LAmx for day and night as well as awakenings (including cumulative with air noise). The model should be developed to inform the ground noise management plan to prevent and progressively reduce noise exposure. Ground noise LAeq,T predictions should include contributions from engine

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			<p>ground running, auxiliary power unit, fire training ground activities and engine around taxi noise</p> <p>Final Position: The Applicant has submitted SOAEL ground noise contours for the day and night period of the 2032 slower transition fleet [REP6-065] but have dismissed any requests to provide ground noise contours from LOAEL up for all scenarios contours showing the change in ground noise within the area covered the relevant LOAEL contour so that effects can be fully understood. The Applicant has refused to acknowledge that engine ground running (30-60 minute activity) should not be assessed using the LA_{max} metric and is more appropriate to be assessed using the LA_{eq,T} metric. This is particularly concerning given the potential for unmitigated ground noise events to occur at the western end of the Juliet runway when there is no barrier/ bund in place.</p>
4.19	Ground Noise Management Plan	There is insufficient consideration given to the control of ground noise within the NRP application.	<p>A ground noise management plan is required, as a certified document, for the purpose of preventing and where this cannot be achieved minimising the impacts of ground noise on the local community. The Best Available Techniques should be adopted within the plan to prevent or minimise the impacts occurring on the local community.</p> <p>Final Position: The Applicant has not addressed the concern that the DCO contains very little information on how ground noise would be controlled.</p>
4.20	Compensation	The scheme of compensation is inadequate to address the effects of aircraft noise on people within and outside their properties	<p>The airport needs to provide a fair and equitable scheme of compensation to affected individuals and the wider community. Such a scheme should be clearly stated, in part as a requirement with supporting information in a certified document.</p> <p>Final Position: The Applicant has not addressed concerns that aspects of the noise insulation scheme are inadequate.</p>

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5. WATER ENVIRONMENT

HDC Ref	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
5.1	Wastewater capacity of the wider network and implications for current and emerging Local Plan development	As the Applicant has identified, the capacity of the public sewer network to which the Gatwick wastewater system discharges is the responsibility of Thames Water. The Council has also been advised by Thames Water that an assessment of the impact of wider projected development in the local area on their sewage treatment works at Horley and Crawley is being undertaken. This issue was explored further at ExQ2 (WE.2.2), and the Applicant submitted a change request to address the possibility of a phasing requirement to allow for wastewater infrastructure upgrades. Given the cumulative impact of the Project and current and emerging Local Plan growth in the area, the Council is concerned about the capacity of the Crawley Wastewater Treatment works to meet this growth and what implications any necessary network reinforcement may have on the timescales for development coming forward.	The Council is aware that the Applicant has submitted a change to the application to allow it to bring forward a wastewater treatment on site. This is welcomed in principle, however there are still uncertainty as to if, or when, this element of the Project might come forward.

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6. CUMULATIVE EFFECTS AND INTER-RELATIONSHIPS

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
6.1	Concerns about CEA methodology and rationale and consistency of assessment across topics	<p>The Applicant appears to have assumed a high level of certainty around other development sites in the District in order to support favourable socio-economic outcomes, while simultaneously citing lack of certainty or information as justification for excluding these same developments from various topics assessments.</p> <p>The methodology and rationale used for the CEA has not been made clear, leading to concerns that the assessment of individual sites may have been applied inconsistently or incorrectly. There is an inconsistent approach applied across the various topic assessments that have the potential to skew the assessment results. For example, Land West of Ifield has been excluded from some assessments, i.e., Transport during its construction phase, despite the Project relying on future Local Plan development coming forward to mitigate housing need arising from the Project. It is also difficult to understand the extent to which key developments have been considered without more transparency in how the CEA has been carried out in more detail.</p>	<p>There needs to be a clearer, more transparent, and consistent approach to the CEA.</p> <p>While the approach to the CEA has been the subject of a number of submissions the Council's position, that the Applicant has not demonstrated that assessment provides a full and robust appraisal of the cumulative impacts of development, remains unchanged.</p>
6.2	Lack of support for a Western Multi-modal Transport Link west of Crawley	It is unclear to what extent the transport impacts of the proposed development at West of Ifield have been considered alongside the construction phase of the Project. The Applicant indicates that it has not been considered necessary to include a cumulative assessment which includes the scheme. The Council disagrees with this decision by the applicant and	Provide support, in policy terms and potentially financially, for the Crawley Western Multi-Modal Transport Link to enable developers to alleviate this impact should development West of Ifield come forward. The Applicant should also ensure this is aligned with achieving mode share commitments elsewhere on the road network.

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		<p>considers there is the potential for unassessed and unmitigated impacts. The Transport Assessment (para 15.5.24 and 18.7.5) acknowledges the modelling shows traffic may take a route on the west side of the Airport from Ifield Avenue in Crawley via Bonnets Lane, these routes are adjacent to the West of Ifield site. There are a number of highways works associated with the West of Ifield scheme, in particular a multi-modal route which the West Sussex Transport Plan and the Crawley Borough Local Plan 2023-2040, Main Modifications Consultation Draft February 2024, identify as an Area of Search. GAL's support for the Crawley Western Multi-modal Transport Link is necessary to alleviate this future impact alongside achieving modal shift elsewhere on the road network. West Sussex LIR Paras 19.28 to 19.32 refer.</p>	
6.3	Treatment of Heathrow expansion (R3).	<p>The Council has several concerns around the way the Heathrow expansion proposals have been considered across the CEA.</p> <p>While the assessment of Heathrow's expansion (R3) alongside the Project is supported, it is disappointing that this has been undertaken in isolation and has not been explored in combination with other developments. As currently presented the assessment is unlikely to capture the realistic worst-case scenario should expansion at both airports occur.</p> <p>In addition, the Council questions the use of future baseline data published as part of the 2019 DCO consultation for a third runway and whether this data is still relevant. It is also unclear on what basis the assumption that air traffic levels at Gatwick would decline if Heathrow R3 is operational by the mid-2030s.</p>	<p>The approach to assessing possible cumulative impacts were Heathrow to come forward should be reviewed and clarified.</p> <p>Final position: A number of concerns remain in respect of the treatment of the Heathrow R3 expansion and whether the interaction of the two proposals has been understated.</p>

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7. CARBON AND GREENHOUSE GASES (GHG)

HDC Ref.	Principal Issue In Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
7.1	In Aviation methodology well-to-tank (WTT) emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology [TR020005].	<p>Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology [TR020005] in Section 16.4.18 where scope 3 emissions were included. Furthermore, this also contradicts the GHG ES Methodology [TR020005] referenced under Section 16.4.24.</p> <p>This would result in an underestimation of the GHG emissions associated with aviation since a 20.77% (BEIS, 2023¹) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO₂e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO₂e was estimated to be released (Table 5.2.1).</p>	The Applicant should confirm if WTT was applied to the Aviation GHG assessment. If it was not, the Applicant is required to update the GHG assessment to account for WTT emissions.
7.2	It is not clear how or if the Applicant converted CO ₂ emissions from aircraft to CO ₂ e.	It is not clear if the Applicant undertook a conversion from CO ₂ to CO ₂ e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) ² . Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO ₂ e in 2028 in the most carbon-intensive year where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	The Applicant is asked to confirm if a conversion was undertaken from CO ₂ to CO ₂ e. If not, the Applicant should update the GHG Aviation Assessment to account for this.

¹ <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

² <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>

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<p>7.3</p>	<p>The unsustainable growth of airport operations may result in significant adverse impacts to the climate.</p>	<p>The increased demand in GAL's services may lead to unsustainable surface access transportation and airport operation growth, which may significantly impact the climate.</p>	<p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> ○ additional in that would not have occurred in the absence of the project ○ monitored, reported and verified ○ permanent and irreversible ○ without leakage in that they don't increase emissions outside of the proposed development ○ Have a robust accounting system to avoid double counting and Be without negative environmental or social externalities.
<p>7.4</p>	<p>Carbon Action Plan</p>	<p>The Carbon Action Plan [REP8-054] lacks an effective mechanism to ensure that carbon reductions align with the Applicant's proposed targets. The EMGF will address</p>	<p>The Legal Partnership Authorities' ISH6 Post-Hearing Submission [REP4-057], the Authorities state that the CAP [APP-091] lacks significant</p>

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		<p>this gap, by implementing controls that limit growth unless actual carbon reductions meet the agreed targets.</p>	<p>sanctions or other measures in the event that the various commitments are not achieved.</p> <p>In response to ExQ1 CC.1.3 [REP4-060], the Authorities state that the CAP should be strengthened by tying its delivery to environmentally sustainable growth.</p> <p>The Authorities set out the Requirement for an Environmentally Managed Growth Framework [REP5-093], which includes limits and thresholds for greenhouse gas emissions, and the Council considers this necessary as a mechanism for ensuring targets will be met.</p>
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8. CLIMATE CHANGE

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
8.1	Expansion of the Airport at a time when the environmental impacts associated with air travel are of local, national and global concern	The Council asks for careful consideration of airport expansion and whether the expansion proposed as part of this DCO application can be justified and supported at this time. The Council is also disappointed at the lack of acknowledgement of local authority positions on Climate Change and what an expanding airport adjacent to Horsham District's boundary means for locally set climate strategy objectives.	The Applicant has given insufficient consideration to a "mitigate to grow" or controlled approach to growth which would provide greater environmental protection and assurance and this should be addressed

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9. ECOLOGY, LANDSCAPE AND HERITAGE

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
9.1	Concerns in relation to potential impacts on sensitive species and habitats and the High Weald National Landscape in the District	The full extent of the Bechstein bat roosts to the west of the Airport have not been shown and there is concern around the noise impacts on Bechstein and Barbastelle bat populations. The Applicant's Ecology and Nature Conservation Figures do not show the Ancient Woodland, St Leonard's Forest SSSI or Local Wildlife Sites within the 15km buffer from the Project Site Boundary nor are the noise impacts / flight paths overlain, including WIZAD (Route 9) which affects the AONB. The impacts of increased overflight on WIZAD (Route 9) on heritage assets in the District also do not appear to have been assessed.	<p>Noise impacts on sensitive receptors should be considered in greater detail. The Applicant is requested to provide more detailed data and assessment of the impacts of the intensified use of WIZAD (Route 9) on sensitive receptors, such as bat populations and tranquil landscapes as there is a lack of clear data as currently presented.</p> <p>The Applicant's update at deadline 5 (section 3 of Supporting Ecology Technical Notes [REP5-069]) referencing engagement with Natural England in respect of the noise impacts on bat populations is noted. Row 2.8.1.1 of Horsham District Council's Statement of Common Ground with the Applicant states that work to establish whether there are additional roost is ongoing. The Council will await the outcome of this survey work, and Natural England's response.</p> <p>The issue of WIZAD and its use in a with-Project scenario is addressed further in Section 4 of this document.</p>

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10. OTHER MATTERS

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
10.1	Incomplete and inconsistent consideration of local planning policies	The Applicant has failed to include Horsham District Council's local planning policies in the Planning Statement. In the ES chapters, local plan policy has been applied inconsistently. For example, for the Socio-Economics chapter paragraph 17.2.14 provides a table which lists adopted and emerging local planning policies relevant to Socio-Economics based on the local study area for this assessment and provides further detail in Appendix 17.2.1. The table of policies is considered incomplete. Furthermore, both the chapter and appendix provide limited analysis of how the Project aligns with the policies of Horsham District Council. Notably, consideration of some of the potential constraints brought about by the Project on the local authority area is absent from any of the analysis produced.	<p>Applicant should include a full list of adopted and emerging policies. A more detailed analysis of how the Project aligns with local policy and strategies should also be provided. Consideration of some of the potential constraints brought about by the Project on Horsham District should be included in the analysis.</p> <p>The Applicant provided a policy compliance table and this has been responded to in REP4-042. The Council does not consider that compliance has been demonstrated.</p>
10.2	Safeguarding of land for a wide-spaced additional runway	The land safeguarded for an additional runway is a very large area of land, around 700 hectares, some of which falls within Horsham District, although the vast extent is within Crawley Borough. The continued safeguarding of land reduces Crawley Borough Council's ability to meet the Borough's own housing and employment needs which has implications for neighbouring authorities, such as Horsham District. The Applicant is not actively pursuing this as a growth option and should therefore review the safeguarding of land, given the scale of development	<p>The Applicant should commit to removing the land currently safeguarded for a wide-spaced additional runway should the NRP receive development consent</p> <p>Final position: The Council remains of the view that, should the NRP receive approval from the Secretary of State, that there should be clear direction on whether land should continue to be safeguarded for an additional wide-spaced runway, taking account of the constraint this places on CBC in meeting it's own housing and employment needs.</p>

Principal Areas of Disagreement Summary Statement (PADSS)

Version Number: 4

Submitted at: Deadline 9: 21 August 2024



HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
		proposed as part of the future baseline and Northern Runway Project as part of the DCO process.	
10.3	Lack of acknowledgement by the Applicant of the interaction between the NRP and Airspace Modernisation	Whilst it is accepted that the simultaneous use of the northern and southern runways do not require airspace change, it is noted that the Applicant's FASI South airspace change options are applicable for both northern and southern runways. Realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process. The Applicant should acknowledge this overall dependency as part of the application.	The Applicant should acknowledge the linkages between Airspace Modernisation and the Project in order to assess and test, in full, the impacts that delivery of the Project will have on local communities.

Principal Areas of Disagreement Summary Statement (PADSS)



Version Number: 4

Submitted at: Deadline 9: 21 August 2024

11. DRAFT DEVELOPMENT CONSENT ORDER AND SECURING MITIGATION

HDC Ref.	Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern?
11.1	Lack of effective controls and enforceable measures to sustainably manage the growth of the Airport	The growth of the Airport should be contained within agreed environmental parameters and managed through control mechanisms, which will ensure mitigation is sufficient and effective.	<p>The Applicant should take a “mitigate to grow” approach that controls growth in a sustainable manner protecting the environment both locally and globally. Such an approach should be secured through the DCO.</p> <p>Further detail has been provided by the Authorities at Deadline 5 in the form of an Environmentally Managed Growth proposal document.</p> <p>Despite the progress made towards the close of the examination the Council remains of the view that there are inadequate controls secured for sustainable expansion of the Airport. The Council considers the Environmentally Managed Growth proposal document the best way of securing the minimum controls necessary.</p>
11.2	The need for an Environmentally Managed Growth Framework (“EMGF”) to control growth within environmental limits	The approach for management of impacts on the environment put forward by the Applicant does not adequately address, or mitigate, the impacts of the Project leading to unacceptable environmental harm.	The Council considers that, despite mitigation measures put forward by the Applicant, the Authorities’ proposal for an EMGF (as detailed in [REP4-050] , [REP5-093] and [REP6-100]), or any similar measures relating to controlling growth at the airport within environmental limits, represents the only way for the ExA, Secretary of State, and local communities to have confidence that growth of the airport will not result in exceedances of assessed environmental impacts and parameters.