

**Gatwick Northern Runway Project (Project Reference: TR020005)**

**Principal Areas of Disagreement Summary Statement (PADSS) – Version 43**

**East Sussex County Council (Registration Identification Number: 20044514)**

**Deadline ~~56-June~~21 August 2024**

This PADSS report has been prepared by East Sussex County Council (ESCC), with input from the joint authorities and appointed consultants where required. This document identifies the initial-remaining principal areas of disagreement that have been identified when reviewing Gatwick Airport's (GAL's) Development Consent Order (DCO) documentation and is an update of -Version 32.

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Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1	The capacity deliverable with the Northern Runway Project (NRP) Proposed Development	<p><del>The Applicant has produced updated simulation modelling of the future capacity of the runway with the NRP [REP1-054], which uses more appropriate assumptions about the separations required between departing aircraft but, nonetheless, indicates lower levels of delay. Further information has been sought regarding the calibration of this model to verify that it does not understate delays before it can be agreed that the NRP is capable of delivering the capacity uplift assumed over the longer term [REP4-052]</del></p> <p><u>Following the provision of further information by the Applicant [REP1-054 and</u></p>	<p><u>Updated position Deadline 9: Assessments should be based on a lower throughput of passengers with the NRP.</u></p> <p><del>Further information regarding the validation of the updated simulation modelling is required. Further discussion is planned to see if further agreement can be reached in relation to the level of demand that can be delivered from the planned capacity</del></p>	Uncertain

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		<u>discussions, the hourly and daily aircraft movement capacity deliverable with the NRP Proposed Development is agreed as the likely maximum throughput attainable. 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>		
2	The forecasts for the use of the NRP are not based on a proper assessment of the market for GAL, having regard to the latest Department for Transport forecasts	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	<u>Updated position Deadline 9: 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</u>	<u>Uncertain— discussions are ongoing</u>

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and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.

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.

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 could be met by expansion at other airports serving London including a third runway or other expansion being delivered at Heathrow.

appropriate controls on growth relative to the impacts.

~~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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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 JLA's 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.

Updated position Deadline 9: The Alternative Baseline Case should be adopted as the basis for assessing the impacts of the NRP.

~~Although GAL is undertaking a submitted sensitivity analysis of alternative baseline assumptions as directed by the ExA, it has not accepted that this alternative Baseline is a more appropriate basis for considering the effects of the Proposed Development. It is considered that the results of this sensitivity analysis should be used as the basis for the assessment of the impact of the NRP and the setting of appropriate mitigations and controls.~~

~~Uncertain – discussions are ongoing~~

3

Overstatement of the wider, catalytic, and national level economic benefits of the NRP.

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

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.

~~Uncertain~~  
Not addressed

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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. 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.

The national economic impact assessment should robustly test the net impact of expansion at GAL having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares. Work is ongoing between York Aviation and the Applicant regarding a joint local authority SoCG on operations / capacity and needs / forecasting.

Updated position Deadline 9:  
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

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			<p><u>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 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.</u></p>
<p><b>Transport &amp; surface access</b></p> <p><b><u>Request for bus service improvements</u></b></p> <p><u>The Council has pursued improvements to bus services in East Sussex to support access to the airport through commitments in the SAC's and alternatively as a requirement. These requests have been unsuccessful.</u></p> <p><u>Whilst the Council notes the applicant's response in REP8-115, that the bus service improvements will be considered as part of 'Commitment 5 in the SAC, which requires reasonable financial support to be provided for the services stated in Table 1 of the SAC, or others which result in an equivalent level of public service transport accessibility'. This is alongside the applicant being 'required to consult the TFSG that additional services (including those requested by East Sussex County Council) would be assessed in order to identify the routes and services which maximise the potential of achieving the mode share commitments'.</u></p> <p><u>The Council remain disappointed that bus service improvements have not been secured. However, as a member of the TFSG ESCC is committed to work with GAL through this forum to prioritise funding to enable bus service improvements</u></p>			

to come forward to provide sustainable surface access to the airport to/from East Sussex. **For the avoidance of doubt, the Council maintains its position that the provision by the Applicant of bus service improvements is essential.**

**Rail Enhancement Fund**

The Council are pleased to note that the Applicant has proposed a Rail Enhancement Fund as specified in the Surface Access Commitments document [REP7-043].

The Council recognise that discussions are continuing to take place with Network Rail, therefore, the Council confirm agreement to this matter. However, should assessment work, including modelling, be required as part of this fund the Council request that the East Coastway line (Brighton to Hastings, via Eastbourne) is included as it is a key corridor to join the Brighton Mainline to access Gatwick Airport.

5	Public transport: rail of the Transport Assessment	The model contains all rail services in the modelled area. However, the assessment focuses on services on the North Downs Line, Arun Valley Line and Brighton Main Line	As previously requested the applicant should include the East Coastway line between Brighton and Hastings as a key corridor to join the BML for access to GAL. Whilst we recognise the Applicant has responded to this [REP3-078] the East Coastway is the key rail route from East Sussex to the airport (via the Brighton Main Line) and should therefore be modelled. We want to be able to promote rail travel to the airport. We consider the East Coastway to be a key rail corridor and disagree that this part	Uncertain – potentially subject to remodelling or well evidenced acceptable justification as to why this has not been included  <u>Addressed</u>
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6	Page 36 (12-33) of the Transport Environmental Statement	Reference to East Sussex CC comment in PEIR to Extend scope of modelling to include Ashdown Forest. The Area of Detailed Modelling includes the Ashdown Forest area.	<p>GAL have confirmed in the March 2024 SOCG (with ESCC) that the transport modelling covers a large area which includes all roads in neighbouring Districts and Ashdown Forest, as indicated in Diagram 5.3.3 of the Transport Assessment.</p> <p>Whilst GAL has sought to assess the impacts of the NRP on Ashdown Forest, and cites the impacts, ESCC requires measures that reduces traffic through sensitive locations near and through Ashdown Forest - which is a Special Area of Conservation (SAC) / Special Protection Area (SPA) – to be considered and introduced.</p> <p>The route through Ashdown Forest (via Sharpethorne) is a key route to the airport and avoids travel along the A22, which is our preferred strategic route to the airport.</p> <p><u>Not addressed</u> <u>Uncertain</u></p>

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Whilst the applicant has stated that 'Agreement has been reached with Natural England on the method used for the HRA assessment and Natural England's Relevant Representations detail that no further information is required with regard to the HRA assessment' (ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 and 2 [APP-134 & APP-135].). Regardless of the agreement with Natural England, we wish for an accurate assessment of the current and anticipated impacts needs to be established in order to understand what the impacts would be, regardless of whether or not they are significant.

**Updated position (Deadline 9):**

It remains unclear what the impacts of the NRP on Ashdown Forest would be in terms of additional vehicular impacts.

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			<p><u>Therefore our previous position remains.</u></p> <p><u>Note: We have noted (since the deadline to GAL at 12pm 12 August 2024) that GAL has 'Agreed' this matter, which goes against the Council's updated position at Deadline 5 (ref. 2.20.2.1). An update to the SOCG by GAL on 19/08/2024 acknowledges that a response has not been provided.</u></p>
7	<del>5.4.1: Surface Access Commitments (Doc Ref. 5.3)</del>	<p><del>Whilst we support the proposals for bus service improvements between GAL Airport and East Sussex there is scope for further improvements</del></p> <p><del>With there being no direct rail connections from much of East Sussex, and therefore the only option for</del></p>	<p><del>ESCC require GAL to clarify how bus service improvements could be funded through the Sustainable Transport Fund (STF).</del></p> <p><del>ESCC are inclined to seek the securing of bus service enhancements through a legal agreement as part of the DCO process. There is concern that the</del></p> <p><del>Uncertain—dependent upon funding</del></p> <p><del>Unlikely</del></p>

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		<p><del>passengers / employees to travel to the airport by private car / taxis, there must be investment into bus services to provide a public transport alternative</del></p> <p>Bus service improvement</p>	<p><del>STF is not legally binding and therefore the bus service improvements as requested run the risk of not being introduced via the STF approach.</del></p> <p><del>GAL provide a long term Masterplan which will consider surface access improvements to/from East Sussex to Gatwick Airport as airport passenger numbers increase, and as public transport opportunities and demand increases.</del></p> <p>Have included in our LIR response (para 4.6.4) that ESCC are: 'supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the existing SAC framework and would still deliver the outcomes that GAL desire. An approach has similarly been considered in respect of the Luton Airport DCO and is referred to as Green Controlled Growth, whereby</p>	
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~~growth is only permitted after targets have been met'.~~

~~Such interventions also to include bus priority infrastructure to improve journey times, improved waiting facilities at bus stops en route, and high quality marketing and publicity.~~

8

~~Surface Access Commitments (SACs) and target mode shares-~~

~~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. Some of the concerns include:-~~

- ~~-~~
- ~~• 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~~

~~ESCC require GAL to clarify how bus service improvements could be funded through the Sustainable Transport Fund (STF).~~

~~ESCC are inclined to seek the securing of bus service enhancements through a legal agreement as part of the DCO process. There is concern that the STF is not legally binding and therefore the bus service improvements as requested run the risk of not being introduced via the STF approach.~~

~~GAL provide a long term Masterplan which will consider surface access improvements~~

~~TBC~~ Unlikely

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		<p><del>numbers and permit significant increases in car trips to and from the airport.</del></p> <ul style="list-style-type: none"> <li><del>Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable infrastructure to successfully meet some of the target modal splits.</del></li> </ul> <hr/> <ul style="list-style-type: none"> <li><del>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</del></li> </ul>	<p><del>to/from East Sussex to Gatwick Airport as airport passenger numbers increase, and as public transport opportunities and demand increases.</del></p> <p><del>Have included in our LIR response (para 4.6.4) that ESCC are: 'supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the existing SAC framework and would still deliver the outcomes that GAL desire. An approach has similarly been considered in respect of the Luton Airport DCO and is referred to as Green Controlled Growth, whereby growth is only permitted after targets have been met'.</del></p> <p><del>Such interventions also to include bus priority infrastructure to improve journey times, improved waiting facilities at bus stops en route, and high quality marketing and publicity.</del></p>	
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		<del>enhanced bus priority measures to provide journey time savings.</del>		
9	<del>Impact of increased passenger and employee numbers associated with Gatwick Airport NRP on local road network</del>	<p><del>Concern over impact of additional car journeys on the road network to Gatwick Airport, leading to increased congestion, longer journey times, increase in emissions.</del></p> <p><del>Concern over the assessment of transport modal share for air passengers and the impact on the road network, including the knock on effects from other authorities.</del></p>	<del>We are happy to be guided by WSCC's response to the sensitivity testing issue and support their response and engagement with the Applicant on this. No further comments to make on this issue.</del>	<del>No longer pursuing</del> <u>Addressed</u>
10	<del>Impact of increased airport capacity on the rail network arising from additional employees and passengers going to and from the airport</del>	<del>There is concern that rail infrastructure and service provision has not been properly considered by GAL. There is a risk that Network Rail's infrastructure, and the service pattern that may not be able to accommodate the increase in demand and</del>	<del>There is no funding associated with rail mitigation in GAL's proposals (like there is for highways). As outlined in Table 5 (T3 &amp; T4) in the ESCC LIR. We wish to see Gatwick's level of commitment to highways extended to rail.</del>	<del>Uncertain</del> <u>Addressed</u>

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		<del>capacity from passengers / employees that will arise should the NRP become operational. This must be considered alongside wider demands for rail travel.</del>	<del>GAL state that the rail network has sufficient capacity. However, we understand NR will be undertaking their own modelling to assess the validity of this statement. ESCG support Network Rail's independent modelling work to identify what the impacts of the NRP would have on the rail network, and consideration will subsequently need to be given as to how the impacts could be mitigated.</del>	
<b>Air quality</b>				
11	Missing figures and the lack of clear study area information	<i>Document 5.1, Chapter 13</i>	The Applicant sets out in paragraph 3.7.7 of their Response	<del>Likely</del> <u>Unlikely</u>



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<p>makes it difficult to understand traffic changes in the different scenarios. This in turn makes it difficult to understand if effects predicted at receptors are reasonable over the construction and operational phases.</p>	<p>Paragraph 13.5.5 of the ES air quality chapter refers to a 'wider study area' (beyond the 11km by 10km domain), plus the modelled affected road network (ARN) outside this area. This is shown on Figure 13.4.1.4.1.1. The ES Air Quality Figures – Parts 1, 2, 3, 4 and 5 have been reviewed, and this figure cannot be identified.</p> <p>Currently, figures within Part 3 just show a wider study area domain, not the actual roads meeting the ARN criteria (e.g. Appendix 13.6.1 Figure 2.3.1). This figure should be provided to illustrate the affected road network. No further information on the road traffic air quality study was identified in ES Appendix 13.4.1: Air Quality Assessment Methodology. However, reference to the above missing figure is</p>	<p>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 the Applicant further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p> <p><b>Updated position (Deadline 9):</b> <u>It is still not possible to look at each individual ARN scenario ARN-to understand if the scenarios and the changes in traffic and pollutant concentrations for each scenario are logical.</u></p>	<p><u>Not addressed</u></p>

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		made within this ES Appendix document, suggesting it has been missed in the collation of this ES Appendix.		
12	<del>The scenarios assessed in the Environmental Statement do not provide a realistic worst-case assessment.</del>	<p><del><i>Document 5.1, Chapter 13</i></del></p> <p><del>Several clarifications are required to understand the Assessment Scenarios sub-section of the chapter. Paragraph 13.5.23 includes a bullet point list of assessment scenarios, including scenarios covering 2029 for both the construction and operation of the proposed development.</del></p> <p><del>Paragraph 13.5.24 provides further detail for the 2029 scenarios, noting there are two assessment scenarios for this year. Additional information is provided in paragraph 13.5.25 which reiterates that there are two separate scenarios for</del></p>	<p><del>The Applicant 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. The Joint Local Authorities have also submitted a detailed review of the Air Quality Action Plan [REP2-004]. Please see REP4-053 for this detailed review.</del></p> <p><del>Without a response from the Applicant further progress cannot be made.</del></p>	<del>Uncertain</del>

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		<p><del>operational and construction situations, due to limitations within the traffic modelling.</del></p> <p><del>Paragraph 13.5.26 then provides information on a slow fleet transition case (SFT) relating to airline fleet assumptions, referencing 2029 as the first full year of opening, 2032 as an interim year and 2038 a design year. For the 2032 scenario, no mention is made that some construction works will still be ongoing (See ES Appendix 5.3.3: Indicative Construction Sequencing).</del></p>	<p><del>It is anticipated that further progress can be made before the next Examination Deadline.</del></p> <p><b><u>Updated position (Deadline 9):</u></b> <u>This matter is now resolved follow further discussion and provision of information by the Applicant.</u></p>	
13	Operational monitoring should be agreed during the examination.	<p><i>Document 5.1, Chapter 13</i></p> <p>Operational monitoring will be crucial to understand if measured air quality is following modelled prediction. There is no information in either the air quality chapter or the Surface Access</p>	The Applicant 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	<p><del>Likely</del></p> <p><u>Uncertain</u></p>

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	Commitments document on how air quality data will be reviewed to check that changes are in-line with predictions, nor what measures would be taken if a significant adverse deterioration occurred.	<p>prepared by AECOM included a wide range of technical matters. The Joint Local Authorities have also submitted a detailed review of the Air Quality Action Plan [REP2 - 004]. Please see REP4-053 for this detailed review. Without a response from the Applicant further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p> <p><b>Updated position (Deadline 9):</b>  <u>Discussions are ongoing concerning operational air quality monitoring. However, any air quality monitoring would be best utilized within an Environmentally Managed Framework (EMG). This is because 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</u></p>	

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			<p><u>continue even where breaches were occurring.</u></p> <p><u>The purpose of the 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>
15	Using the application documents, is not possible to relate the figures to the results set out in the appendices tables	<p><i>Document 13.6.2</i></p> <p>The receptor tables include most of the expected information, including a receptor ID reference. However, the tables (e.g. Table 2.1.1 and Table 2.4.1) do not identify which figure the receptor listed is shown, as would be typically expected, to allow readers to move between the appendix, chapter and figures.</p> <p>However, as receptors are not labelled by ID this is</p>	<p>GAL should update receptor figures to present receptor IDs. Additionally, a column identifying the local authority location for each receptor would be extremely useful.</p> <p>Note: this links to our concerns over the impacts of air quality on Ashdown Forest (which is an area of European Ecological Importance, Special Area of Conservation, and a Site of Special Scientific Interest (SSSI). Need to consider these impacts as part of the modelling work being undertaken (air quality - nitrogen deposition issues arising from</p> <p><del>Likely</del> <u>Not addressed</u></p>

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	therefore not possible in this ES. The reader needs to plot the grid references provided to understand where a receptor is.	additional traffic through Ashdown Forest).  The Applicant 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. The Joint Local Authorities have also submitted a detailed review of the Air Quality Action Plan [REP2 - 004]. Please see REP4-053 for this detailed review. Without a response from the Applicant further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.  <b>Updated position (Deadline 9):</b> <u>The point concerning receptors on figures being made was that members of the public and people</u>	

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			<u>without access to shapefiles will not be able to follow the information within the ES without improved figures. The Applicant suggests that Table 2.1.1 can be used in conjunction with figures (e.g. 2.1.4) as the tables include the grid references of the receptors. However, this is incorrect as the figures do not include labelled grid lines. Without this the reader cannot use the grid references in the tables to locate receptors. The reader needs to enter the grid reference information from the receptor table into a third party tool or use a map with grid lines to enable them to link the two elements of the ES. The reader should not need to undertake additional work to understand the ES.</u>	
16	Lack of sensitivity analysis on the	<i>Document 5.1, Chapter 12</i>	The Applicant sets out in paragraph 3.7.7 of their Response	Uncertain

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anticipated modal shift, and the associated air quality impacts.

Paragraph 12.8.6 of the traffic and transport chapter sets out a variety of measures to produce the modal shift assumed with the proposed development. Within the assumptions, there are controls on on-site parking numbers, parking charges and forecourt access charges. There is insufficient sensitivity analysis on these figures, including the impact on air quality if they are not achieved.

to Deadline 3 Submissions [REP4-031] that the air quality matters submitted by the Joint Local Authorities at Deadline 3 (Appendix A) [REP3-117] will be responded to by Deadline 5. This Appendix of air quality queries prepared by AECOM included a wide range of technical matters. The Joint Local Authorities have also submitted a detailed review of the Air Quality Action Plan [REP2 - 004]. Please see REP4-053 for this detailed review. Without a response from the Applicant further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.

**Updated position (Deadline 9):**

The Council continues to consider that this information would assist in understanding the air quality risks associated with modal shift targets were not achieved. As this is unlikely to be provided at this stage this increases the importance of an EMG framework.



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			<u>In the event that an EMG approach was not possible further safeguards could be adopted in an AQAP or similar.</u>	
<b>Greenhouse gases (carbon)</b>				
18	<del>Carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the Environmental Statement methodology.</del>	<del>Document 16.9.1 (table 2.1.1), 16.9.2 (table 2.1.1) and 16.9.4</del>  <del>Not accounting for WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting standard, referenced in the GHG ES Methodology in Section 16.4.18, where scope 3 emissions were included.</del>  <del>Furthermore, this also contradicts the GHG ES Methodology referenced under Section 16.4.24, which states “GHG factors are drawn from a range of national and international sources. Where these</del>	<del>In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total emissions from the project between 2018 and 2050 by 3,978,000 tCO<sub>2</sub>e, representing a 19.83% increase.</del>  <del>To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant compares only this portion of aviation WTT emissions to the carbon budget, along with the</del>	<u>Addressed</u> <u>Uncertain</u>

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~~factors are expected to change over the duration of the Project then a time-based factor is used, based on estimating the extent and rate at which the factor will change. This estimation process draws on industry standards, industry-specific guidance, and a range of other UK and government policy and strategy documents.”~~

~~Additionally, the approach taken goes against the UK Government’s carbon accounting methodology from BEIS (2022)<sup>1</sup>, which recommends that “Well-to-tank (WTT) fuels conversion factors should be used to account for the upstream Scope 3 emissions associated with extraction, refining and transportation of the raw fuel sources to an~~

~~WTT emissions from construction, ABAGO, and surface access.~~

~~The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES.~~

~~The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is decarbonising in line with the estimated net zero trajectory.~~

**Updated position (Deadline 9):**

This matter has been resolved.

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		<p><del>organisation's site (or asset), prior to combustion."</del></p> <p><del>WTT emissions represent a significant portion of fuel emissions (around 20%) and need to be accounted for.</del></p>	
19	<p><del>GAL does not identify the risks associated with using carbon offset schemes.</del></p>	<p><del>Document 5.4.2, Section 1.14</del></p> <p><del>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."</del></p> <p><del>The scientific community has identified various risks around using offsetting</del></p>	<p><del>Addressed.</del></p> <p>The Applicant, in 2.11.4.1 of the SOCG with East Sussex County Council (to be submitted at Deadline 5) has addressed this issue.</p> <p><b>Updated position (Deadline 9):</b> <u>This matter has been resolved.</u></p>

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		<del>schemes to claim net zero or carbon neutrality. GAL should specifically state which offset scheme they intend to use so research can be conducted into the trustworthiness of the scheme.</del>		
20	<del>GAL indicates it is relying upon Renewable Energy Guarantees of Origin ("REGO") to achieve its Net Zero and Zero Carbon commitments. However, purchasing REGO certificates does not necessarily reduce emissions from grid electricity consumption to zero.</del>	<p><del>Document 5.4.2 (section 3.1.2)</del></p> <p><del>This states "For emissions that occur outside the Gatwick Airport site boundary where GAL can make an impact, we have already taken action, such as electing to purchase 100% Renewable Energy Guarantees of Origin ("REGO") electricity since 2013 and installing 22 charging points for airport ground operation vehicles in 2019 (Ref. 1.6)."</del></p> <p><del>The guidelines for the UK Government Streamlined Energy and Carbon</del></p>	<del>—The Applicant, in 2.11.4.2 of the SOCG to be submitted at Deadline 5 has provided an updated position which satisfies our concern on this issue. Therefore, this is can now be classed as 'Addressed'.</del>	<del>Addressed.</del>

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~~Reporting (SECR) advise, "Where organisations have entered into contractual arrangements for renewable electricity, e.g. through Power Purchase Agreements or the separate purchase of Renewable Energy Guarantees of Origin (REGOs), or consumed renewable heat or transport certified through a Government Scheme and wish to reflect a reduced emission figure based on its purchase, this can be presented in the relevant report using a "market-based" reporting approach. It is recommended that this is presented alongside the "location based" grid-average figures and in doing so, you should also look to specify whether the renewable energy is additional, subsidised and supplied directly, including~~

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~~on-site generation, or through a third party."~~

21

~~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.~~

~~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.~~

~~The Applicant should demonstrate how they will provide sufficient charging infrastructure within the Airport to support the uptake of electric vehicles anticipated in the Government's Transport Decarbonisation Plan. Charging facilities in the surrounding area may be overwhelmed if there is insufficient charging available at the airport.~~

~~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~~

~~Uncertain~~  
Addressed

**Climate change (impacts)**

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22	<p><del>Inconsistency and lack of detail in some climate impact statements.</del></p>	<p><del>Document 5.1 (tables 15.8.5 and 15.8.6) The climate impact statements (detailed in Table 15.8.5 and Table 15.8.6) are lacking in consistency in the way they are articulated in that some are missing an 'impact.' They have a cause e.g. 'increased flooding' and an 'event' e.g. flooding of electrical equipment' but no end 'impact' e.g. resulting in increased maintenance requirements OR resulting in operational downtime. This result is what should determine the consequence rating and the approach taken could have led to an underestimation of risk.</del></p>	<p><del>GAL should update all climate impact statements to have a clear end impact so that all risks are described in a consistent way.</del></p> <p><del>The Applicant indicated at Deadline 3 that it is committed to providing charging infrastructure for electric vehicles used to access the Airport (both passenger and staff) to facilitate the use of ultra-low and zero emission vehicles for journeys made by car, however, concerns remain.</del></p> <p><del>The Applicant should demonstrate <b>how</b> they will provide sufficient charging infrastructure within the Airport to support the uptake of electric vehicles anticipated in the Government's Transport Decarbonisation Plan. Charging facilities in the surrounding area may be overwhelmed if there is insufficient charging available at the airport</del></p>	<p><del>Under discussion</del> <u>Addressed</u></p>
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			<del>The Applicant is committed to investing £1m to Metrobus in hydrogen buses for the local network which we support.</del> <b>Updated position (Deadline 9):</b> <u>These matters have been resolved through the SOCG and can be marked as addressed.</u>	
<b>Socio economics</b> <u>ESCC welcomes the updated ESBS and Draft ESBS Implementation Plan, which were shared at Deadline 7. The ESBS and Implementation Plans have been secured through the S106, but the Council require an ongoing dialogue with GAL through our role of the Steering Group to ensure that East Sussex's employment and skills needs are addressed and reflect our comments made during the examination.</u>				
23	<del>Concern over lack of consideration of economic impacts on East Sussex</del>	<del>It is unclear what the economic impacts of the NRP on East Sussex would be</del>	<del>There is a need for the applicant to fully set out the economic impacts of the Northern Runway proposal.</del>  <del>There is a need to further understand the employment and skills offer arising from the NRP. We would expect substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that the airport work with local training providers and colleges in East Sussex to ensure that training;</del>	<del>Uncertain</del> <u>Addressed</u>



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			<del>pathways and careers opportunities are offered. In the ESBS [APP-198] and Implementation plan [REP3-069], ESCC would like to see:</del> <ul style="list-style-type: none"> <li><del>- East Sussex College included in planned 'Consortium-based Delivery' (5.3.8) in order that any benefits reach local East Sussex residents. Note concern that there is a bias from the ESBS Adviser (2.2.7) due to roles at Chichester and Surrey colleges. The</del></li> <li><del>- consortium would be better made up of those members of FE Sussex in order to overcome this bias.</del></li> </ul>	
24	Concern over lack of consideration of economic impacts on East Sussex	Need for reassurances that the subcontractors are delivering social value and working to the appropriate benchmark and procurement frameworks	<del>GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff)</del>  Sub-contractors should work to the CITB national skills academy for	Agreed  <u>Addressed</u>

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~~construction framework benchmarks, and the same in relation to non-construction procurement~~

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~~Concern over lack of consideration of economic impacts on East Sussex~~

~~The Employment Skills and Business Strategy (ESBS) should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.~~

~~The current version of the ESBS [APP-198] does not include specific mention of 'links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex' – still only refers to Coast to Capital LEP Careers Hub, which no longer exists and has now been subsumed by WSCC.~~

Likely Addressed

26

~~Concern over lack of consideration of economic impacts on East Sussex~~

~~In non-construction, the option should include upskilling existing workforce which includes residents of East Sussex.~~

~~In the ESBS [APP-198] & Implementation plan [REP3-069], ESCC would like to see: REP3-069], ESCC would like to see:  
- East Sussex College included in planned 'Consortium-based Delivery' (5.3.8) in order that any benefits reach local East Sussex residents. Note concern that there is a bias from the ESBS Adviser (2.2.7)~~

Uncertain Addressed

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			<del>due to roles at Chichester and Surrey colleges. The consortium would be better made up of those members of FE Sussex in order to overcome this bias.</del>	
<del>27</del>	<del>Concern over lack of consideration of economic impacts on East Sussex</del>	<del>There is a need to ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.</del>	<del>Social value element in SME/Sub-contractor contracts mirror provision in GAL's ESBS</del>	<del>Addressed</del> <del>greed</del>
<del>28</del>	<del>Concern over lack of consideration of economic impacts on East Sussex</del>	<del>GAL should develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should develop (not just promote) international trade opportunities with</del>	<del>Development of Inward Investment Service and Strategy by GAL</del>  <del>There still remains insufficient detail. The response at Row 2.19.3.2. is unclear and does not specifically refer to inward investment. Therefore, we do not feel that this point is satisfactorily answered.</del>	<del>Uncertain — under discussion as at 12.08.24</del> <del>Addressed</del>

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	<del>destinations aligned to LGW's route network</del>		

## NOISE AND VIBRATION

Ref	Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Noise and vibration</b>				
29	Lack of detail on noise impacts for East Sussex	Concerned that the impacts of noise on East Sussex communities has not been adequately addressed and assessed, and that appropriate mitigations will not be in place	<p>Expect GAL to provide greater clarity on how many more flights would be passing over East Sussex, which locations would be the most affected and how this would be mitigated.</p> <p>This includes paying particular attention to sensitive and protected areas, such as Ashdown Forest. 2032 is not the worst-case year in terms of overflights. Overflight figures should be provided for all assessment scenarios. Northern runway departures should be included in overflights so impacts</p>	<p><del>Likely</del></p> <p><u>Unlikely</u></p> <p><u>Not addressed</u></p>

can be understood in areas close to the airport. The Deadline 1 position identifies that figures are still too coarse to draw any meaningful information from so this has not been addressed. Overflight figures should show aircraft below 4,000 feet as noise contours are most affected by aircraft movements below 4,000 feet.

**Updated position (Deadline 9):**

The Council disagree that overflights should only be assessed up to 7,000 feet. CAP1616a explicitly states: “Change sponsors should portray LAeq, 16 hours noise exposure contours as a means of explaining noise impacts for airports where the proposed option is likely to result in a change in traffic patterns or traffic volumes or fleet mix below 4,000 feet”

It goes on to state:

“The height of 4,000 feet was selected as the criterion for LAeq contours because aircraft operating above this altitude are unlikely to affect the size or shape of LAeq contours”

As such, provision of overflights up to 7,000 feet does not provide

			<p><u>necessary information to supplement the air noise assessment based on LAeq noise effects.</u></p> <p><u>The Council would like to be able to contextualise the impact of additional aircraft movements through provision of relevant overflight contours as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>_____ for aircraft movements below 4,000 feet.</u></li> <li>• <u>_____ provided as contours calculated from 100mx100m grids.</u></li> <li>• <u>_____ include aircraft movement associated with the northern runway.)</u></li> </ul>	
30	Clarification on estimated overflight mapping	There is a need for assurances on the accuracy and reliability of the estimated overflight mapping, and we will require East Sussex to be included as part of this.	<p>GAL to respond on this point. If East Sussex has not been included we would wish the overflight mapping to be revisited to include the county, and the results updated and shared as appropriate for consideration.</p> <p>2032 is not the worst-case year in terms of overflights. Overflight figures should be provided for all assessment scenarios. Northern runway departures should be included in overflights so impacts can be understood in areas close to the airport. The Deadline 1 position</p>	<p><del>Uncertain</del></p> <p><del>Unlikely</del></p> <p><del>Not addressed</del></p>

			<p>identifies that figures are still too coarse to draw any meaningful information from so this has not been addressed. Overflight figures should show aircraft below 4,000 feet as noise contours are most affected by aircraft movements below 4,000 feet.</p> <p><b>Updated position (Deadline 9):</b> <u>The Council disagree that overflights should only be assessed up to 7,000 feet. CAP1616a explicitly states: “Change sponsors should portray LAeq, 16 hours noise exposure contours as a means of explaining noise impacts for airports where the proposed option is likely to result in a change in traffic patterns or traffic volumes or fleet mix below 4,000 feet”</u></p> <p><u>It goes on to state:</u> <u>“The height of 4,000 feet was selected as the criterion for LAeq contours because aircraft operating above this altitude are unlikely to affect the size or shape of LAeq contours”</u></p> <p><u>As such, provision of overflights up to 7,000 feet does not provide necessary information to supplement the air noise</u></p>	
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			<p><u>assessment based on LAeq noise effects.</u></p> <p><u>The Council would like to be able to contextualise the impact of additional aircraft movements through provision of relevant overflight contours as follows:</u></p> <ul style="list-style-type: none"> <li><u>_____ for aircraft movements below 4,000 feet.</u></li> <li><u>_____ provided as contours calculated from 100mx100m grids.</u></li> <li><u>_____ include aircraft movement associated with the northern runway.</u></li> </ul>	
34	<del>Capping of night flights to protect local communities</del>	<del>Concern that the use of the northern runway will increase the negative impacts of aircraft noise on local communities at night – impacting detrimentally on physical and mental health and wellbeing.</del>	<del>Night flights will need to be restricted / capped, and the Northern Runway should not operate, between the hours of 23:00 and 06:00. We need assurances that there are not dispensations that GAL can routinely operate within this restricted night-time period, notwithstanding use of aircraft at night for emergencies.</del>	<del>Agreed</del> <u>Addressed</u>
<b>Legislation, policy and guidance</b>				
32	Interpretation of the Overarching Aviation Noise Policy	Paragraph 14.2.44 of the Environmental Statement Chapter 14 Noise and Vibration – sharing the benefits has been removed from the ES. This is a fundamental part	It should be demonstrated as part of the Noise Envelope how the noise benefits of future aircraft technology are shared between the airport and local communities. This is a policy requirement set out in the Aviation Policy Framework.	<del>Uncertain</del> <u>Unlikely</u> <u>Not addressed</u>



		of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities.	<p>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 have been shared with the local community in this case.</p> <p>ESCC's position maintains that there should be no allowance for any increase in noise contour limits to provide certainty to communities about noise they would experience in the future should the project be consented.</p> <p><b>Updated position (Deadline 9):</b>  <a href="#">The Council maintain their position that there should be no allowance for Noise Envelope contour limits to increase.</a></p>	
<b>Assessment of significant effects – Air Noise</b>				
33	<del>No assessment criteria is provided for the assessment of effects on non-</del>	<del>Assessment criteria based around the LOAEL and SOAEL focuses on noise effects at residential receptors.</del> Non-residential receptors	<del>Provide an assessment of likely significant air noise effects on non-residential receptors.</del>  <del>It is noted that the Applicant has provided detailed non-residential</del>	<del>Likely</del>  <del>Addressed</del>

	<del>residential receptors</del>	<del>should be considered on a case-by-case basis with assessment criteria defined depending on the non-residential use.</del>	<del>screening criteria in The Applicant's Response to ExQ1 – Noise and Vibration [REP3-101]. The criteria are not agreed as it contains an error and criteria for schools is based on measured noise data at a school near London Luton Airport and is applicable at that location only.</del>	
34	The assessment switches between discussing properties and population depending on whether noise is between LOAEL and SOAEL (population) or above SOAEL (properties)	The assessment should cover both properties and population and be consistent when identifying significant effects to aid their understanding.	Provide an assessment of likely significant air noise effects covering both properties and population.  <u>Updated position (Deadline 9): The Applicant has not addressed this request for additional information.</u>	<del>Likely</del> <del>Unlikely</del> <u>Not addressed</u>
35	Identification of population exposed to noise above SOAEL and between LOAEL and SOAEL	It is not clear what population is exposed to changes in noise above SOAEL and between LOAEL and SOAEL in Table 14.9.10 and 14.9.11	It would be helpful to provide tables identifying the population exposed to changes in air noise at absolute noise levels between LOAEL and SOAEL and for population experiencing absolute air noise levels exceeding SOAEL  <u>Updated position (Deadline 9):</u>	<del>Likely</del> <u>Uncertain</u>

			<u>The Council would like to see an updated version of Chapter 14 where this matter could be addressed.</u>	
36	Properties that are newly exposed to noise levels exceeding the SOAEL are not identified	It is important to identify how many properties are newly exposed to noise levels exceeding the SOAEL to determine compliance with the first aim of the ANPS	<p>Identify how many and the location of properties newly exposed to noise levels exceeding the SOAEL</p> <p>The Applicant should revisit Table 14.9.10 and Table 14.9.11 as they do not show population exposed to changes in noise between LOAEL and SOAEL and above SOAEL</p> <p><b>Updated position (Deadline 9):</b>  <u>The Council would like to see an updated version of Chapter 14 where this matter could be addressed</u></p>	<del>Likely</del> <u>Not addressed</u>
37	Paragraph 14.9.98 of the Environmental Statement Chapter 14 Noise and Vibration states that there would be reduced movements on the main runway resulting in Minor Beneficial effects	It is not clear if these Minor Beneficial effects would continue through the project lifespan when more capacity is taken up and the main runway may return to current intensity of operations	<p>Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.</p> <p>The requested information should be clearly provided by providing a detailed assessment of all assessment years so noise effects can be understood throughout the lifespan of the project.</p> <p><b>Updated position (Deadline 9):</b></p>	<del>Likely</del> <u>Not addressed</u>

			<u>The Council would like to see an updated version of Chapter 14 where this matter is addressed.</u>	
38	<del>Only 2032 assessment year is assessed as a worst case</del>	<del>The assessment of air noise only covers 2032 as it is identified as the worst case.</del>	<del>Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.</del>  <del>From the Applicant's position—confirming that the assessment years listed should be covered—it appears this matter has been resolved, and therefore this matter can be agreed.</del>	<u>Likely Addressed</u>
39	No attempt has been made to expand on the assessment of likely significant effects through the use of secondary noise metrics.	Context is provided to the assessment of ground noise through consideration of the secondary L <sub>Amax</sub> , overflight, L <sub>den</sub> and L <sub>night</sub> 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>Provide some commentary about how secondary metrics relate to likely significant effects and whether the assessment of secondary metrics warrant identifying a likely significant effect.</p> <p>The Applicant does not demonstrate a consistent approach to assessing likely significant effects. ESCC's position remains that secondary metrics should be used to identify likely significant effects. ESCC would also request that the Applicant sets out their methodology for identifying likely significant effects due to L<sub>max</sub> events above 65dB in the day and 60dB at night.</p>	<del>Uncertain</del>  <u>Unlikely Not addressed</u>

			<p><u>Updated position (Deadline 9): The Applicants response relates to ground noise; however, ESCC is concerned with how air noise will affect the county. ESCC's position remains that secondary metrics should be used to identify likely significant noise effects</u></p>	
<p><b>Document name: Appendix 14.9.2 Air Noise Modelling</b></p>				
40	<p><del>Assurances that areas of East Sussex below 7,000 feet have been included in the air noise modelling work</del></p>	<p><del>Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level.</del></p>	<p><del>It is understood that some aircraft (GAL related air traffic) do pass over parts of East Sussex below 7,000 feet. Therefore we require such areas to be included as part of the air noise modelling work. For example, Crowborough which has areas which are 794 feet above sea level. Also, Ashdown Forest which is a noise sensitive area.</del></p> <p><u>Updated position (Deadline 9): the Applicant has confirmed that the Environmental Statement provides a full assessment of air noise across East Sussex.</u></p>	<p><del>Agreed</del></p> <p><u>Addressed</u></p>
41	<p><del>No details on the 92-day summer average aircraft fleet for each</del></p>	<p><del>It is difficult to understand what has been modelled and how fleet transition would occur without provision of aircraft fleets</del></p>	<p><del>Provide aircraft fleets for each modelled scenario</del></p> <p><u>Agreed – now that aircraft fleets have been provided.</u></p>	<p><del>Agreed</del></p> <p><u>Addressed</u></p>

	<del>scenario are provided</del>			
42	No details of the noise modelling or validation process are provided	It is difficult to have any confidence in the noise model without any provision of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours	<p>Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided</p> <p>ECRD Report 2002 does not contain the information requested. The information is important to understand the aircraft noise contours has not been provided by the Applicant. The information was initially requested after the ESCC review of the PEIR and the Applicant has not fulfilled the request.</p> <p><b><u>Updated position (Deadline 9):</u></b>  <u>The Applicant has provided information on the validation of the Boeing 737-800 aircraft only [REP5-079]. The issue regarding the lack of information on air noise model validation was raised at ISH9 and the Applicant responded that the data was confidential to the CAA and could not be releases. The JLAs have since contacted the CAA who stated they would release the data with the consent of the Applicant. ESCC await provision of the following information</u></p>	<p><del>Uncertain</del></p> <p><del>Unlikely</del></p> <p><del>Not addressed</del></p>

			<p>i) <u>the results of statistical analysis of SEL and LAm<sub>ax</sub> data for individual aircraft at each monitoring location that feed into the validation process at Gatwick along with a figure showing the monitoring locations on a map.</u></p> <p>And:</p> <p>ii) <u>a comparison of the measured SEL and LAm<sub>ax</sub> data against predicted levels for each aircraft. We would like to see this information for all aircraft that make up 75% of the noise energy at the airport.</u></p>	
43	No details of measured Single Event Level or LAS <sub>max</sub> noise data from the Noise-Track-Keeping are provided	Measured Single Event Level and LAS <sub>max</sub> noise data should be provided for individual aircraft variants as it is key information used when defining the aircraft noise baseline.	<p>Provide Single Event Level and LAS<sub>max</sub> noise data for individual aircraft variants</p> <p>The requested information should formally be submitted and should include L<sub>max</sub> and SEL data for all aircraft that were validated. There is no dispute on the use of ANCON to model air noise, but it is important that sufficient information is provided such that it can be understood how aircraft fleets are transposed into noise contours. This information has been requested since the PEIR and the Applicant has not yet provided what is important and relevant</p>	<p><del>Uncertain</del></p> <p><del>Unlikely</del></p> <p><del>Not addressed</del></p>

			<p>information that underpins the air noise assessment.</p> <p><b><u>Updated position (Deadline 9):</u></b> <u>The Applicant has provided information on the validation of the Boeing 737-800 aircraft only [REP5-079]. The issue regarding the lack of information on air noise model validation was raised at ISH9 and the Applicant responded that the data was confidential to the CAA and could not be releases. The JLAs have since contacted the CAA who stated they would release the data with the consent of the Applicant. ESCC await provision of the following information</u></p> <p>i) <u>the results of statistical analysis of SEL and LAm<sub>ax</sub> data for individual aircraft at each monitoring location that feed into the validation process at Gatwick along with a figure showing the monitoring locations on a map.</u></p> <p><u>And:</u></p> <p>ii) <u>a comparison of the measured SEL and LAm<sub>ax</sub> data against predicted levels for each aircraft. We would like to see this information for all aircraft that make up 75% of the noise energy at the airport.</u></p>	
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**Document name: Appendix 14.9.7 The Noise Envelope**

44	Slow fleet transition noise contour area limits	There is no incentive to push the transition of the fleet to quieter aircraft technology. This means that the Noise Envelope allows for an increase in noise contour area on opening of the Northern Runway	<p>Noise contour area limits should be based on the Central Case</p> <p>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 have been shared with the local community in this case.</p> <p>ESCC's position maintains that there should be no allowance for any increase in noise contour limits to provide certainty to communities about noise they would experience in the future should the project be consented.</p> <p><b><u>Updated position (Deadline 9):</u></b> <u>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</u></p>	<p><u>Not addresssd</u>Unlikely</p>
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			<p><u>Appendix 6.2.2 [APP-095]) which states:</u></p> <p><u>“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”.</u></p> <p><u>It is noted that the applicant failed to provide this information:</u></p> <ul style="list-style-type: none"><li><u>i) _____ in its Scoping Response to PINS set out in 2.3.11 of Appendix 6.2.3 [APP-096].</u></li><li><u>ii) _____ In response to the Surrey Local Impact Report - Appendix C: Noise and Vibration District and Borough Profiles [REP1-100].</u></li></ul>	
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			<p><u>In -the Applicant’s response – Updated position (July 2024) in column 4 - (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.</u></p>	
45	Annual noise contour limits	Noise contour area limits 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.	<p>Annual noise contours should be included in the Noise Envelope</p> <p>Current DfT night-time controls apply to Gatwick for the summer and winter seasonal periods. The DCO should include a commitment that these controls are retained and maintained regardless of any future changes that may occur as a result of consultation relating DfT night flight restrictions. Night-time QC and movement limits for both summer and winter periods should be reported. It is noted that the Applicant exceeded their summer period night-time movement limit in 2023 so this information is relevant and important to the Noise Envelope.</p> <p><b><u>Updated position (Deadline 9):</u></b>  <u>ESCCs position is that it is essential that there is a commitment in the</u></p>	<p><b>Uncertain</b></p> <p><b><u>Unlikely</u></b>  <u>Not addressed</u></p>

			<a href="#">DCO to retain and maintain DfT night noise controls should DfT night noise controls or Gatwick's designated airport status change in future.</a>	
46	Flexibility of noise contour area limits to account for airspace redesign and future aircraft technology	GAL wants flexibility to increase noise contour area limits depending on airspace redesign and noise emissions from new aircraft technology. If expansion is consented, any uncertainties from airspace redesign or new aircraft technology should be covered within the constraints of the Noise Envelope	<p>There should be no allowance for the Noise Envelope limits to increase</p> <p>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 have been shared with the local community in this case.</p> <p>ESCC's position maintains that there should be no allowance for any increase in noise contour limits to provide certainty to communities about noise they would experience in the future should the project be consented.</p> <p><b><u>Updated position (Deadline 9):</u></b>  <u>ESCCs response to sharing the benefits is set out in row 2.16.4.2 of the ESCC SOCG.</u></p>	<p><b>Uncertain</b></p> <p><u>Unlikely</u></p> <p><u>Not addressed</u></p>

			<u>ESCC maintain their position that there should be no allowance for Noise Envelope contour limits to increase.</u>	
47	CAA to regulate the Noise Envelope	To date, the CAA have not accepted a role regulating the Noise Envelope. There is no mechanism for local authorities to review Noise Envelope reporting, take action against breaches or review any aspects of the Noise Envelope	<p>A mechanism should be included to allow the local authorities to scrutinise noise envelope reporting and take action in the case of any breaches</p> <p>ESCC maintain their position that the Host Authorities should be part of an independent group set up to regulate the Noise Envelope.</p> <p><b>Updated position (Deadline 9):</b>  <u>The Council maintain their position that the Host Authorities should be part of an independent group set up to regulate the Noise Envelope.</u></p>	<u>Uncertain</u> <u>Not addressed</u>
48	Adoption of an action plan	A breach would be identified for the preceding year, with an action plan in place for the following year. Consequently, it would be two years after a breach before a plan to reduce the contour area would be in place	<p>More forward-planning needs to be adopted to ensure that action plans are in place before a breach of the noise contour area limit occurs.</p> <p>The Applicant has not provided any information to support the use of forecasts to prevent contour limit breaches. ESCC maintain that forecasts are not reliable enough to prevent noise contour area limit</p>	<u>Uncertain</u> <u>Unlikely</u> <u>Not addressed</u>

			<p>breaches. An alternative forward-looking method should be adopted that can be applied during scheduling that can provide more confidence that breaches would not occur.</p> <p><b>Updated position (Deadline 9):</b>  <a href="#">The Council support the JLAs submission for an Environmentally Managed Growth Framework [REP4-040].</a></p>	
49	Capacity declaration restrictions as a means of managing aircraft noise	This would not prevent new slots being allocated within the existing capacity and is not an effective means of preventing future noise contour limit breaches if a breach occurred in the previous year	<p>Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation</p> <p>ESCC maintain their position on this matter.</p> <p><b>Updated position (Deadline 9):</b>  <a href="#">The Council maintain their position on this matter.</a></p>	<p><u>Uncertain</u>  <u>Not addressed</u></p>
<b>Document name: Appendix 14.9.8 Noise Envelope Group Output Report</b>				
50	Airbus NEOs (New Engine Option) are stated to be up to 5 dB quieter departure and 3	This statement is misleading as these levels of noise reductions are not achieved by Airbus A320Neo or A321Neo, which are the	<p>Provide a more realistic reduction in noise that is provided the NEO aircraft.</p> <p>It is requested that the Applicant provide measure SEL and LMax</p>	<p><u>Likely</u>  <u>Uncertain</u>  <u>Not addressed</u></p>

	<p>dB quieter on approach.</p>	<p>main Airbus variants that will be operational at GAL in the future.</p>	<p>noise data for each aircraft variant modelled at each monitoring location. This information underpins the air noise assessment and is important for understanding to aircraft fleets are transposed into air noise contours.</p> <p><b>Updated position (Deadline 9):</b> <u>The Applicant has provided information on the validation of the Boeing 737-800 aircraft only [REP5-079]. The issue regarding the lack of information on air noise model validation was raised at ISH9 and the Applicant responded that the data was confidential to the CAA and could not be released. The JLAs have since contacted the CAA who stated they would release the data with the consent of the Applicant. ESCC await provision of the following information:</u> i) <u>the results of statistical analysis of SEL and LAmax data for individual aircraft at each monitoring location that feed into the validation process at Gatwick along with a figure showing the monitoring locations on a map.</u> <u>And:</u></p>	
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			ii) <u>a comparison of the measured SEL and LAmax data against predicted levels for each aircraft. We would like to see this information for all aircraft that make up 75% of the noise energy at the airport.</u>	
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