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<p>E01: Overstatement of economic benefits of the proposal</p>	<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. 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. 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. 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</p>	<p>Assessments should be based on a lower throughput of passengers with the NRP.</p> <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.</p> <p>The Alternative Baseline Case should be adopted as the basis for assessing the impacts of the NRP.</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. The national economic impact assessment should robustly test the net impact of expansion at Gatwick having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.</p> <p>Updated Position – 16-08-24</p> <p>Although the Applicant provided some further explanation in REP3-78 (pages 100-105) and REP7-077, the council remains concerned that the</p>	<p>Unlikely</p>

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	<p>London including a third runway or other expansion being delivered at Heathrow. 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. TDC believes 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.</p> <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. TDC is 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 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.</p>	<p>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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<p>N01: Interpretation of Aviation Policy and Local Planning Policy (in relation to air noise)</p>	<p>TDC disagrees with the way aviation noise policy is being interpreted and the consequential effects these have on the proposals. TDC also disagrees that compliance with Local Planning Policy has been demonstrated due to a lack of detail in the proposal.</p>	<p>The ES chapters need to be amended to comply with aviation policy and the consequential effects this may have on the proposal. Amendments to the submissions should be made to detail how regard is being had to Local Planning Policy and how the proposals have incorporated these or otherwise.</p>	<p>Unlikely</p>
<p>N02: Threshold and scope of LOAELs and SOAELs for consideration of air noise</p>	<p>In relation to air noise, the ES only considers the Leq metric for LOAELs and SOAELs. This is too narrow and other metrics should be applied to the decision processes within the project to inform impact and proposals for mitigation. The consideration only of the Leq metric does not represent all the effects of air noise across the district.</p> <p>TDC maintains their position that likely significant effects are not appropriately identified by the LAeq,T metric; and supplementary metrics should be used to identify likely significant effects.</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>Unlikely</p>
<p>N03: Modelling of air noise primary and secondary metrics.</p>	<p>The noise model used in the assessment cannot currently be validated by anyone else other than the applicant. Additional scenario testing is considered necessary in the models.</p> <p>ERCD Report 2002 does not contain sufficient information on validation, including such measures as SEL and LAm_{ax} data for</p>	<p>GAL to release all baseline data and uncertainties used in noise modelling to enable validation of the model by participants. Further modelling is to be produced as necessary.</p>	<p>Unlikely</p>

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	<p>individual aircraft variants that were modelled and the difference between predictions and measurements. The information is important to understand the aircraft noise contours has not been provided by the Applicant and underpins the air noise assessment. The information was initially requested after the TDC review of the PEIR and the Applicant has not fulfilled the request.</p>		
<p>N04: For air noise, the 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 baseline.</p>	<p>The Environmental Statement takes into consideration only the marginal increase in noise as a result of the additional capacity of the NRP.</p> <p>In that way 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 awakening. 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.</p>	<p>An existing baseline for all metrics needs to be established with sensitivity testing for baseline and cumulative impact with northern runway in operation to understand total effects of the operation and whether this is a) acceptable and b) appropriate mitigation is set in place to address it.</p> <p>Confirm whether all properties where one awakening would occur will receive noise insulation.</p>	<p>Unlikely</p>

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N05: Limited assessment of changes in sound levels for air noise	Changes in noise levels that lie exclusively within LOAEL or exclusively within SOAEL a have not been comprehensively assessed.	<p>Additional clarification is required for changes in exposure to an agreed range of metrics including N above, awakenings and overflights to understand impacts with confirmation as to how they can be mitigated.</p> <p>Information is not clearly provided. Table 14.9.10 and Table 14.9.11 should be updated to show population exposed to changes in noise between LOAEL and SOAEL and above SOAEL.</p>	Unlikely
N06: Noise Insulation Scheme	The proposal for the noise insulation scheme is not timely nor adequate to deal with either noise and the problem of overheating created as a result of the noise mitigation and ongoing costs incurred as a result of works to individual properties.	TDC considers that factors such as extending the range of qualifying metrics (in addition to the Leq), basing the extent of qualifying noise contours on single mode operation and additional award to deal with overheating issues caused as a result of noise insulation need to be brought forward. The promoter also needs to pay for ongoing running and maintenance costs of noise and overheating mitigation as well as renewal at end of life. All community buildings should also be included in the mitigation scheme. All mitigation should be based on agreed predictive contours and installation commence with the decision for permission.	Unlikely
N07: Noise Envelope	TDC does not consider the noise envelope is fit for purpose for multiple reasons.	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 improvement with the local community through a range of operational and outcome-based measures. It needs to be governed by a steering committee that	Unlikely

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		includes local authorities and provide them with a balanced range of intervention and enforcement tools.	
N08: Future research	TDC consider that there is insufficient validation of the mitigation; and research to improve understanding of, for example, the effectiveness of the mitigation, the reliability and resolution of the noise contours, local attitudes to noise and cross correlation to the noise contours.	Clear proposals need to be agreed for future research and mechanisms for triggering and setting future research. We would expect this to be mandated in the DCO. The purpose is to provide an iterative feedback mechanism to achieve continuous improvement and for this to succeed the findings must be acted on in a timely manner. All work to be funded by the applicant.	Unlikely
N09: Draft DCO	The draft DCO does not contain adequate provisions for the control of air noise given the magnitude of effect.	A different approach to the management and control of noise is sought to that proposed by Gatwick whereby local authorities have wide ranging statutory powers and are fully funded by the applicant for all the work they undertake.	Unlikely
AQ01: Ultra-Fine Particles Assessment	An assessment of UFPs has not been included, while the council acknowledges a full quantitative assessment cannot be undertaken, TDC has concerns that the suggestion that PM2.5 is a suitable proxy is incorrect. The proposal adds new emissions from aviation. The ES acknowledges that UFPs could have adverse health impacts but no mitigation is proposed to minimise emissions.	<p>Provision of further information and further assessment for Ultra-Fine Particles required. Mitigation proposals are required such as a commitment to lower sulphur aviation fuels.</p> <p>Updated Position – 16-08-24</p> <p>The Applicant has agreed to an increase in funding for ultrafine monitoring, but not to implement this prior to standards being published and the funding will not cover all costs for equipment purchase or operation. Further funding and proactive monitoring in advance of standards should be undertaken to gather a set of</p>	Unlikely

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		baseline data. This monitoring is also needed to address the limitations associated with the assessment approach utilised within the ES [APP-038].	
AQ02: Particulate Matter Standards	The construction impact assessment requires revision to reflect the updated particulate matter standards. The ES assessment is based on advice that uses the older air quality standards. The latest PM2.5 standards are much more stringent and should be reflected in the ES. The concern is that human health impacts have not been fully assessed in the construction impact assessment	The assessment should be revised to reflect the new standards for particulate matter. Updated Position – 16-08-24 Matter resolved.	Unlikely.
AQ03: Worse-case assessment	The lack of clarity on the selection of assessment years and their configuration re operation and construction gives TDC concerns that the worst-case scenario has not been assessed. Gatwick Airport Limited (GAL) comments 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 following information is required: Clarification is needed on how the use of two parallel scenarios for 2029 provide a realistic worst case to be evaluated. A single scenario reflecting the anticipated operation of the increased capacity at the airport with the surface access construction works is the realistic worst case in 2029. Similar clarification as to how operational activities and ongoing construction works in 2032 have been assessed. Additionally, general clarification is required as to how the selection of assessment years and their configuration re operational and construction was made and how this aligns with the requirements of the Airports National Policy Statement including par 5.33, specifically including when at full capacity,	Unlikely

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		<p>including interaction between construction and operational changes.</p> <p>Updated Position – 16-08-24</p> <p>The Applicant has provided further information on 2029 scenarios and this matter is resolved. However, in relation to the latter matter concerning the assessment of the Airport at full capacity 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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<p>AQ04: Mitigation and monitoring</p>	<p>Construction monitoring should form part of the DCO requirements. There is insufficient information provided explaining how air quality data will be reviewed to check that changes are not more adverse than predicted, nor what measures would be taken if a significant adverse deterioration was monitored.</p> <p>Gatwick Airport Limited (GAL) comments 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.</p> <p>Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>Introduce monitoring requirements in the DCO. Ensure that s106 operational monitoring is proposed and details on how this will be used to test the effectiveness of the Surface Access Commitments provided and agreed.</p> <p>Updated position 16-08-24</p> <p>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 continue even where breaches were occurring.</p> <p>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.</p>	<p>Likely</p>

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<p>AQ05: Assessment of short terms effects</p>	<p>Environmental Statement Air Quality Appendix 13.4.1 Air Quality Assessment Methodology: Paragraph 3.1.3 indicates that short term objectives have been considered through reference to annual values. As previously described this is only appropriate for road traffic sources.</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>Amendment of assessment method and documents to reflect new assessment with correct metric.</p> <p>Updated position 16-08-24</p> <p>Matter resolved.</p>	<p>Matter resolved.</p>
<p>AQ06: Monitoring sites</p>	<p>TDC is concerned that excessive numbers of monitoring sites may have been excluded from model verification which could have improved the quality of the air quality verification and so the confidence in outputs.</p> <p>Gatwick Airport Limited (GAL) comments 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)</p>	<p>Further details on the sites excluded on this basis is required. Further details could be added to Table 3.2.2 of Environmental Statement Air Quality Appendix 13.6.1 to address the clarification points.</p> <p>Updated position 16-08-24</p> <p>Matter resolved.</p>	<p>Matter resolved</p>

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	<p>[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.</p>		
<p>AQ07: Verification zones</p>	<p>TDC disagrees that enough justification was provided for the selection of different verification zones and why the model would be expected to perform differently in each area. A sensitivity test is required to demonstrate that the conclusions of the assessment would not change if a single verification factor were used.</p> <p>Gatwick Airport Limited (GAL) comments 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.</p>	<p>A sensitivity test is required to demonstrate that the conclusions of the assessment would not change if a single verification factor were used.</p> <p>Updated position 16-08-24</p> <p>Matter resolved.</p>	<p>Matter resolved</p>
<p>AQ08: Monitoring system for Construction Traffic</p>	<p>TDC disagrees that enough details is provided on the restrictions and monitoring of construction traffic utilising routes through the J10 M23. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. Further details are requested during the examination.</p>	<p>Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. Further details are requested during the examination.</p> <p>Updated Position – 16-08-24</p> <p>Further information (as described above) requested by the Council to show how monitoring will be used</p>	<p>Uncertain</p>

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	<p>Gatwick Airport Limited (GAL) comments 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.</p> <p>Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>	<p>to identify any deviation from the expected impacts has not been received.</p> <p>The Council maintains its position that detailed monitoring requirements should be provided in the outline plans to provide assurance that the final CMTP and CWTP will be substantially in accordance with any agreed monitoring plans.</p>	
<p>AQ09: Monitoring framework - Construction</p>	<p>The Monitoring Framework for the Construction Workforce Travel Plan is unclear (Document name: Environmental Statement Appendix 5.3.2 Code of Construction Practice, Annex 2 Outline Construction Workforce Travel Plan).</p> <p>Gatwick Airport Limited (GAL) comments 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)</p>	<p>More information is required during the examination on the monitoring framework.</p> <p>Updated Position – 16-08-24</p> <p>See Above (AQ08)</p>	<p>Uncertain</p>

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	<p>[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.</p> <p>Without a response from GAL further progress cannot be made. It is anticipated that further progress can be made before the next Examination Deadline.</p>		
<p>AQ10: Petrol and diesel car ban</p>	<p>The government has announced on 20/09/2023 that it would delay the ban on sales of new diesel and petrol cars from 2030 to 2035. It would be useful to understand how this had been factored into the emissions projections and whether it would create any new impact or risen any existing impacts.</p>	<p>The ES modelling will need to be amended and likely impacts and mitigations re-evaluated.</p> <p>Updated position 16-08-24</p> <p>Matter resolved.</p>	<p>Matter resolved.</p>